

Date 7 Jan 2008  
Your date 15 Nov 2007

# SWEDISH MARITIME ADMINISTRATION

## Shipping and Society

Processing officer, direct line  
Patrik Wiberg, 011-19 12 64

## RESPONSE TO REFERRAL FOR CONSULTATION

Our ref 0602-06-02991  
Your ref 121-7846-06

## SEPA

106 48 Stockholm

## SMA statement of opinion on supplementary documentation for environmental impact assessment for Nord Stream Gas Pipeline

The SMA is in receipt of Nord Stream's project information "Status of Nord Stream pipeline in the Baltic Sea". In regard to this matter, the SMA remarks that the project information (October 2007) does not contain any major changes in relation to what has been presented earlier in the process. The SMA does, however, present the following comments and opinions to be considered in the ongoing work.

The responsibility of the SMA is to monitor the conditions for the conduct of shipping within established shipping lanes and [ensuring] that safety at sea is not diminished in consequence of activities concerned with the gas pipeline.

In its earlier statements of opinion in response to referrals for consultation, to Ramböll AB (26 Feb 2007 and 2 Oct 2007) and the SEPA (26 Jan 2007), and at consultation meetings, the SMA has put forward a number of problem areas and issues which the SMA considers, based on maritime safety aspects and others, must be analysed and described in the forthcoming Environmental Impact Assessment. In the supplementary documentation (Project Information, October 2007), there is no sign that any actions have been taken in response to the views presented by the SMA. Nor is it evident whether and, if so, to what extent, the points put forward by the SMA will be analysed and considered in the EIA. The SMA therefore makes reference once more, and in addition, to the previous letters from the SMA, which are available at [www.sjofartsverket.se](http://www.sjofartsverket.se).

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### **SMA in dialogue with the Danish maritime authorities (*Søfartsstyrelsen* and *Farvandsvæsenet*)**

The SMA has, together with the Danish maritime authorities Søfartsstyrelsen and Farvandsvæsenet, had an informal discussion and an exchange of experiences regarding the specific shipping issues in regard to the planned gas pipeline and the supplementary documentation from Nord Stream (Project Information, October 2007). In the course of these discussions, it was established that we are essentially entirely of one mind in terms of what problem issues are relevant and which routes are to be preferred, based on the interests of maritime traffic. Some points from these discussions may be of interest to present in this context:

#### *General*

- Experiences of the SMA are that Nord Stream has given slight or no response to the alternative proposals on pipeline routing which the maritime authorities have put forward (see map appendix "Map Baltic Sea"). The Danish maritime authorities also wish for better documentation of the proposed route alternatives before any final decisions can be made.
- Experiences from both the Danish maritime authorities and the SMA are that Nord Stream has given slight or no response to the alternative proposals on pipeline routing which the maritime authorities have put forward.
- A shared view was that a more thorough description of alternative routes in general should be drawn up, in which the reasons for which certain alternatives have been dismissed are clearly stated. According to the project information (2007), it is stated (**chapter 6, page 16**) that Nord Stream has decided in consultation with the Danish authorities to go ahead with the alternative DK-02, i.e. the route to the north of Bornholm. The SMA took this to mean that the Danish authorities also took part in these consultations and that the interests of shipping were represented. According to the Danish maritime authorities, this is not true, and it is unclear what "Danish authorities" Nord Stream means.

#### *Shipping lanes and route of gas pipeline*

- The exposure of operations in or in the vicinity of shipping lanes means risks and impaired conditions for shipping in the form of e.g. collision risks and anchoring restrictions.
- One way of minimising exposure in shipping lanes is to cross shipping lanes at as perpendicular an angle as possible (as short a crossing route as possible). See examples in map appendices Map 1 and Map 2.

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- Both the Danish and Swedish maritime authorities prefer a route for the gas pipeline passing to the south of Bornholm.
- From a maritime safety point of view, the location alternatives for the platform are unsuitable. The SMA plans a recommended route between Gotska Sandön and Fårö towards the Gulf of Finland to increase safety in the area. Approx. 5,000 vessels pass through this area per annum. The platform will be too close to the traffic route. See map appendix, Map 1.

### *Anchoring*

- Unsuitable to run gas pipeline between shipping lane and shallow area (described in more detail below). See map appendix Map 2 and Map 3.
  - The pilot station on Bornholm and the impact upon it of the gas pipeline needs to be described.
  - Agreed that more in-depth analysis of risk connected with anchoring/effect on the pipeline is done by other companies and should also be done by Nord Stream.
- Near-misses have occurred on several occasions in the Bornholmsgat Strait, causing damage to cables because of anchors. The statistics of such events should be presented and analysed.

### *Exterior impact on gas pipeline*

- Need for analysis of effects of a ship sinking and landing on the gas pipeline.
- Need for analysis of effects of a heavy cargo falling over board and landing on the gas pipeline.
- Agreed that PSSA classification of the Baltic Sea means that different and special requirements apply in comparison to many other sea areas where offshore work is done. Even greater safety margins are required.

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### **SMA's specific comments on supplementary documentation (Project Information, October 2007)**

New to the SMA is the information that according to table 1-1 (**chapter 1.1 page 2**) it is planned to move the gas pipeline farther out away from the Natura 2000 area south east of Gotland, and thus closer to the deep water shipping lane. This has not been discussed with the SMA at any consultative instance, as intimated to happen on page 13. The SMA strongly questions the suitability of placing the gas pipeline between shipping lanes and the protected sea bank areas. A vessel at risk for any reason of finding itself in shallow areas must be able to carry out necessary procedures to prevent this from happening, e.g. by emergency anchoring (see illustration in map appendix Map 2). The location of the deep water shipping lane south east of Gotland was designed precisely to move heavy tanker traffic out as far as possible from the Hoburg Bank so that vessels would, in the event of e.g. "blackout", be able in time to carry out necessary measures to prevent the vessel's going aground on the Hoburg Bank.

Because Nord Stream has indicated that it intends to introduce an anchoring ban/restrictions along the pipeline route, the SMA considers that gas pipelines within such "buffer areas for emergency anchorage" would mean impaired conditions for shipping to manage situations as they arise and would thus e.g. have the potential to impair protection against grounding e.g. on the Hoburg Bank (see illustration in map appendix Map 2). The SMA recommends, based on shipping interests and the protection of the Hoburg Bank, an alternative route for the gas pipeline, to the east of the deep water shipping lane.

The same condition can be applied to the area between the northern and southern Midsjö Banks (Norra and Södra Midsjöbankarna) passed by the deep water shipping lane and where the gas pipeline crosses the deep water shipping lane at a diagonal over a section approx. 40 km in length. Here, the SMA considers that an alternative route should be investigated to the south of the Södra Midsjöbanken (see map appendix Map 3).

In the Project Information (**chapter 3, page 6**), Nord Stream states *"For the EIA, the main focus will be placed on possible disturbances to the sea bed in consequence of interventions (excavation, dredging, rock dumping) and on problems in relation to chemical and conventional munitions.* One of the purposes of the EIA is to consider the holistic perspective of the environmental impact an operation can be expected to exert over its entire planned life span. At this stage, then, to limit the work to placing a focus solely on the impact of construction operations is to take a perspective that is much too narrow. The SMA considers that other issues are not accorded the attention that would actually be required in analysis work if a relevant basis for decisions is to be achieved. For example, this applies to issues taking into account indirect consequential environmental impacts in consequence of the gas pipeline, e.g. problem issues related to shipping.

In table 5-1 (**chapter 5, page 14**) under Id C9, the route south of the Hoburg Bank and Norra Midsjöbanken is indicated as a special section where attention must be paid to e.g. protection against anchors (at rest). Unclear what is meant by this and the SMA considers that documentation needs to be clarified. If the text refers to analysis of how the gas pipeline should be protected against anchorage, the SMA considers that similar analyses must be done for all areas where the gas pipeline would pass through or in the vicinity of established shipping routes.

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Nord Stream states (**chapter 6.1, page 16**) that a risk assessment for the area north of Bornholm, also to include shipping traffic, will be included in the EIA documentation. The SMA considers that such a risk assessment must be done along the entire pipeline route where it passes through or in the vicinity of established shipping routes, not only for the area north of Bornholm.

In table 8.3 (**chapter 8 appendix, page 27**), the consequential parameter "Risk of accident with vessel collision and consequent oil discharge" is given under the activity "Installation of pipeline". The SMA considers that this is to the highest degree relevant and hence must also be presented for the activities "Sea bed work, dredging, excavation and refill", "Rock dumping", "Construction of service platform" and "Operation of service platform" (page 28).

Table 8.3 (**chapter 8 appendix, page 28**). Under the activity "Operation of pipeline", a consequential parameter should be introduced describing "Exterior inspection and maintenance work. Area occupied round inspection and maintenance vessels" with "affected environmental parameters" being Fisheries and Shipping Traffic.

Table 8.3 (**chapter 8 appendix, page 28**). Under the activity "Accidents with pipeline / service platform"; add same text as is found under equivalent consequential parameter (e.g. Finland, Denmark etc), i.e. "Vessel accident with gas discharge from pipeline, damage to service platform, dumped munitions exploding, break in pipeline due to free span".

Table 8.6 (**chapter 8 appendix, page 32**), under activity "Installation of pipeline" is given the consequential parameter "Risk of accident with vessel collision and consequent oil discharge". The SMA considers that this is to the highest degree relevant and hence must also be presented for the activities: "Sea bed work, dredging, excavation and refill", "Rock dumping", "Construction of service platform" and "Operation of service platform" (page 33).

Table 8.6 (chapter 8 appendix, page 33). Under activity "Accidents with pipeline /service platform", add same text found under each consequential parameter, i.e. "Vessel accident with gas discharge from pipeline, damage to service platform, dumped munitions exploding, break in pipeline due to free span".

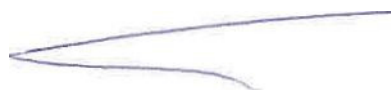
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The processing of this case, which has been decided by the Director of Shipping and Society, Maria Gelin, has also involved the participation of the Director of the Shipping Traffic Unit, Pernilla Bergstedt, the Director of the Infrastructure Unit, Tage Edvardsson, nautical officer Ulf Lejdebrink, Shipping Traffic Unit, environment officer Thomas Ahsberg, Shipping Lane Department, risk analyst Markus Lundkvist, Infrastructure Unit, and processing officer Patrik Wiberg, Infrastructure Unit, reporter.



Patrik Wiberg



Maria Gelin

Appendices: See special map appendix

Cc to:

Ministry of Enterprise, Energy and Communications  
Swedish Board of Fisheries  
Geological Survey of Sweden  
Swedish Geotechnical Institute  
Swedish Coast Guard  
Swedish Energy Agency  
National Board of Housing, Building and Planning  
Swedish Rescue Services Agency  
Swedish Emergency Management Agency  
Swedish Armed Forces  
Swedish Legal, Financial and Administrative Services Agency  
County Administrative Board, Stockholm  
County Administrative Board, Gotland  
County Administrative Board, Kalmar County  
County Administrative Board, Blekinge County  
County Administrative Board, Skåne County  
Farvandsvæsenet (Denmark)  
Søfartsstyrelsen (Denmark)