

**Estonian Ministry of Environment**  
**Narva mnt 7a**  
**Tallinn 15172**

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**PROPOSALS AND OPINIONS**  
**to the transboundary EIA programme of Russian-German gas pipeline project**

Hereby we present our proposals and opinions concerning the EIA programme (PID - project information document) of Russian-German gas pipeline project Nord Stream.

First of all in our opinion following aspects are important:

1. The EIA programme leaves the impression like the decision about realization of the project has already been made, however in fact the decision about the realization can only be made after the identification (including EIA in a transboundary context) of environmental impacts. For example, on page 32 it is noted that „an environmental impact assessment is a pre-requisite for granting permits to construct the pipeline system in all countries in question”. It leaves an impression that the EIA process is just one stage in the procedure of granting permits and the fact if the permits are granted or not, does not depend on that. In our opinion possible influence of the EIA results to decision making should be clearly pointed out in the program of EIA.
2. In the EIA programme, there is not enough attention on impacts that can emerge from contacts with conventional ammunition and dumped chemical munitions in seabed. There is a reference to planned investigations of the locations of chemical munitions and for need to apply precaution measures, but in our opinion during the EIA it should be also thoroughly evaluated, what kind of impacts can emerge from contacts with this kind of munitions and their potential distribution to wider area.
3. From the aspect of Estonia the impacts connected to construction and operating of the service platform should be stressed out because according to preliminary plans the service platform will be established next to Estonian waters. During the EIA the alternative locations of service platform should be analyzed and the comparison of the impacts connected to construction and operating in different locations should be made. Besides, visual impact of the service platform should be investigated during EIA not only in relation to Sweden (as it is foreseen in the EIA programme), but also in relation to Estonia.

4. The risks to gas pipeline that might derive from marine casualty and sinking wrecks should also be considered in the EIA programme.
5. In case, when it is planned to install 2 pipelines, the impact of installing 2 pipelines should be assessed already now, otherwise it would be splitting the project which is so-called *salami slicing* method, that is not allowed in the practice of the EIA.

Sincerely yours,

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