

*Hello!*

*Thank you for the effort of forming a common position. However there are some proposals.*

*Proposals are following (formulation added by me is in bold):*

*Under point 2. formulation of Estonian Ministry of Foreign Affairs would be better (point 2 preambula + c) ja point 4):*

2. The potential location of the gas pipeline in the Baltic Sea has been investigated only in limited area. According to the information presented in the EIA programme, investigations in EEZ's of all the Baltic Sea countries have not been conducted - it is not possible to confirm that gas pipeline location has been chosen on the assumption of smallest potential environmental impacts.

According to the EIA programme, the alternative locations of the pipeline have been investigated in 1997-1998 by North Transgas Oy (company registered in Finland). In our opinion these investigation results are insufficient, because the primary task of North Transgas Oy included connections with Finland and Sweden. Therefore investigated alternatives handled only with north and west part of the Baltic Sea (mainland, territorial sea and exclusive economic zone of Finland and Sweden). The EIA programme presented by Nord Stream AG does not foresee this kind of connections and therefore it is necessary to investigate all possible alternatives for gas transport from Russia to Germany, including alternatives outside the Baltic Sea region.

*About ship traffic threats there could be a separate point as mentioned in the letter from Estonian Ministry of Foreign Affairs by referring directly to the risk of break down of the pipeline and ask to take these factors into account in EIA (it is not sufficient to say that the probability of these kind of incidents is small):*

During the EIA we find it necessary to assess thoroughly the risks, which derive from crossing and covering of the pipeline with shipping traffic corridors. It turns out from the project description that the gas pipeline route has been projected into the passageway of the Gulf of Finland, within most intense shipping traffic, where already now the guiding passageways of shipping traffic apply by the rules of IMO. Construction of the gas pipeline in that passageway creates additional risks, which can considerably harm navigation rules used for the protection of sea environment. **In areas, with so intense shipping traffic, there are probable accidents that can harm the gas pipeline, which means that the source of main potential environmental impact of the operating phase is leakage of the gas. EIA has to consider moderate and long-time gas leakage to the sea environment and also large-scale leakage in consequence of accident (breaking of the pipeline). Impact of natural gas to water environment has to be investigated during the EIA, also to determine dangerous concentration limit and assess probability of its occurrence. EIA has to give comprehensive assessment, what are the potential damages in the case of major accident; what are the opportunities of dissolving and compensating it.**

As the navigation passageways are engaged for the protection of the Baltic Sea as the particularly sensitive sea area, no new activities which could create further risk and are in contravention of the marine environment protection measures should not be allowed. In the EIA programme the aspects related to the fact that the Baltic Sea was determined as particularly sensitive sea area (PSSA) by IMO in 2005 have been neglected completely.

Ants Erm,

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