

Regional Council of Southwest Finland

24 January 2007

Uusimaa Regional Environment Centre  
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STATEMENT TO THE UUSIMAA REGIONAL ENVIRONMENT CENTRE ON  
THE ASSESSMENT PROGRAMME OF THE ENVIRONMENTAL IMPACT OF  
THE RUSSIA-GERMANY UNDERSEA NATURAL GAS PIPELINE IN  
FINLAND'S EXCLUSIVE ECONOMIC ZONE

At its meeting on 22 January 2007, section 20, the provincial government of the Regional Council of Southwest Finland unanimously decided to issue the following statement:

The prepared EIA programme satisfies the requirements on the content and sites of the assessment stipulated in Finland's act and decree governing the assessment of environmental impact.

The initial plans locate the pipeline corridor within Finland's exclusive economic zone, but close to Finland's territorial waters and coastal areas. It is highly probable that, especially during the construction stage, there will be detrimental effects on the environment in Finnish territory, such as the release of nutrients and harmful substances from the sediments on the seafloor and the clouding of the water. Therefore, the impact assessment must result in an optimal route for the pipeline in the final plans that avoids conflicts involving conservation areas and other uses of the sea (shipping lanes, areas used by the Defence Forces, busy fishing grounds, etc.). From the point of view of Southwest Finland, the Archipelago Sea [*Saaristomeri*], a part of the Baltic Sea, is a particularly important maritime area. Since 1999, the province has implemented the Pro Saaristomeri programme whose key goal is the improvement in the condition and usability of the sea. Therefore, the Regional Council of Southwest Finland requires that in the EIA report to be prepared on the basis of the environmental impact assessment programme under discussion, the harmful effects of the location of the pipeline especially on the Archipelago Sea are investigated thoroughly and measures for their elimination or reduction to a minimum are presented.

According to the programme, the EIA procedure examines two alternatives: Alternative 0 in which the project is not implemented, and Alternative 1, in which the underwater gas pipeline is built. With respect to Alternative 0 (the project is not implemented) the programme notes that it contains numerous uncertain factors and

therefore the EIA procedure concentrates on the impact of Alternative 1 (the project is implemented) in the assessment of environmental impact. Not implementing the project has an indirect environmental impact on Finland e.g. as a result of emissions carried to Finland over long distances from the production and use of energy in Central Europe. Therefore, the impact of Alternative 0 must be investigated sufficiently that a comparison can be carried out and the alternative chosen in a justified way that has the least harmful effects on the environment.

The Regional Council of Southwest Finland considers it to be unfortunate that the TEN natural gas network has not been expanded with pipelines that connect the Nordic countries.

During the preliminary planning of the undersea pipeline, it was proposed that a branch be built extending to Finland. This possible branch could have a positive effect e.g. on the connection of Southwest Finland to the natural gas distribution network. The project plan now under discussion does not indicate the possible connection point or the route of a possible branch pipeline. The developer of the project should consider separately whether the assessment of the environmental impact of a possible pipeline branch leading to Finland should be carried out in association with the EIA procedure of this project plan.

The possible harmful environmental impact of the completed gas pipeline should also be assessed and prevented.

REGIONAL COUNCIL OF SOUTHWEST FINLAND

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