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REGIONAL COUNCIL OF KYMENLAAKSO

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Statement on the environmental impact assessment programme: “The Russia-Germany undersea natural gas pipeline in Finland’s exclusive economic zone.”

The Regional Council of Kymenlaakso wishes to express its gratitude for being invited to issue a statement.

The Regional Council of Kymenlaakso believes that in the assessment of environmental impact the special environmental conditions, and vulnerability of the maritime environment, of the eastern Gulf of Finland must be taken into account more clearly.

The maritime environment of the eastern Gulf of Finland is the most ecologically delicate and vulnerable part of the entire planning area. In addition, the sediments contain unusually large amounts of nutrients and environmental toxins. The eastern Gulf of Finland contains high and hard exposed glacial tills and rock that according to the assessment programme will require considerably more work to alter the seafloor that is harmful to the environment than in other parts of the planning area.

To minimize the work to alter the seafloor, alternative routes for the pipeline must be studied more carefully within the gas pipeline corridor now presented, and the impact of the various alternatives must be assessed (for example, the “zigzagging” of the pipeline perpendicular to the main direction vs. digging and filling in).

In the eastern Gulf of Finland, it would also be justified to indicate new alternative routes for the pipeline outside or near the two kilometre wide gas pipeline corridor now proposed (Alternative 2). The new alternatives would help in the search for the best possible route if more detailed studies show that significant environmental challenges occur inside the present corridor.

The assessment programme notes that pressure testing measures will not be carried out in Finland and no impact on the Finnish environment is expected. Nevertheless, the Regional Council of Kymenlaakso believes that measures carried out at the landfall point of the pipeline could affect the Kymenlaakso coast e.g. due to the sea current from the east to the west.

The possible emptying of rinsing water into the Bay of Vyborg and its impact on the coastal environment of the nearby area should be assessed. The assessment should also provide information on which of the three proposed alternative emptying areas for the rinsing water is likely to cause the least negative impact on the environment.

The environmental impact assessment programme notes that the transportation of natural gas in liquid form in ships would allow the transportation of nearly three times as much gas per year from Russia to Germany (Alternative 0). But the programme does not indicate why this alternative cannot be implemented. In addition, the programme should explain how the Espoo EIA Convention is applied in Russia.

REGIONAL COUNCIL OF KYMENLAAKSO

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