

Ms Veronika Verš
Senior Officer of Environmental Management Bureau
Ministry of the Environment
Narva mnt 7a
Tallinn

15.12.2006

Subject: The EIA programme of Russian-German gas pipeline project (Nord Stream)

Dear Ms Veronika Verš,

Stockholm Environment Institute (SEI) Tallinn Centre has examined the draft transboundary EIA programme of Nord Stream gas pipeline project (Russian-German).

At first we would like to recognize developer's efforts to give as varied information as possible about the project and its location, including through pictorial and map materials.

In our opinion, for Estonia, higher risks connected to Nord Stream project can occur during construction phase (blasting, mining, coating of the pipeline) of the gas pipeline and service platform (and its latter servicing), planned west from Saaremaa. Therefore Estonian Government should apply for participation in procedure of the EIA in a transboundary context.

Our proposals for complementing the EIA programme are related to the selection of alternative routes and comparison of criteria. In the EIA programme the developer has described route alternatives of gas pipeline only from the aspect of investment expenses (chapter 4.1, page 28), but in the case of route selection environmental aspects should be primarily taken into account.

Based on the above mentioned information SEI makes the following proposals for complementing the EIA programme:

1. Developer should compare alternative locations of pipeline route on the assumption of environmental aspects.
2. Developer should propose alternative locations of service platform including comparison of them on the assumption of environmental aspects.
3. Developer should propose technological alternatives for installing and maintaining the pipelines including comparison of them on the assumption of environmental aspects.
4. Environmental impacts should be considered during both period (construction and operation) by stages and sections (including affected countries) of performable activities.

Regards,

Kaja Peterson
Programme leader in the tasks of Director