

SOCIETY FOR NATURE PROTECTION IN HANKO

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Uusimaa Regional Environment Centre
PO Box 36
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Reference: Your public notice of 14 November 2006

Subject: Russian-German offshore gas pipeline

Opinion on the Environmental Impact Assessment (EIA) programme

The domicile of the Society for Nature Protection in Hanko is Hanko. The Society work to promote nature and environmental protection within its area of operation in Hanko. The Society wishes to put forward the following opinion on the EIA programme for the gas pipelines.

The project and its impact assessment

The aim of the project is to construct a gas pipeline from Russia to Germany that would run along the seabed in the Gulf of Finland within Finland's economic zone. The Society for Nature Protection in Hanko considers that impacts of the project on Hanko's marine and land areas as well as the ecosystems in the Baltic sea and especially the Gulf of Finland and their functioning should be assessed in the manner required under legislation and international treaties. Particular attention should be paid to the following issues in the planning and carrying out of the assessment.

Seabed levelling

The planned route of the gas pipeline along the bed of the Gulf of Finland is in many places quite even. Therefore, the seabed will have to be levelled by dredging, dumping and also blasting. These activities do not only cause suspended sediment and the water to become turbid during the construction period, but also many other kinds of damage:

- Phosphorus nutrients are mobilized from sediments at the seabed, which are spread with the currents and are mixed in with the water masses. As they are carried along into surface waters, they cause eutrophication by increasing the production of algae.
- Organic matter that has been stored in sediments in the seabed are also mobilized, and as they break down they use up the oxygen supply, that is in any case limited, in the water layers close to the bottom and in this way impair the potential to sustain life for creatures at the seabed.
- Heavy metals that may possibly have accumulated in the sediment at the seabed and other poisonous substances will be released and will cause damage to the biota.
- Chemicals possibly dumped along the route of the gas pipeline and war materials may also be released if their containers are ruptured. They can also be carried long distances

with the sea currents. They can cause harm not only to the sea life but also directly to humans (e.g. mustard gas). Before started the work that is to be carried out on the seabed, the pipeline route must be examined in as much detail as possible so it is possible to avoid releasing the content of containers that have been dumped in the seabed.

The possible effects of the work to be carried out at the seabed should be assessed in coastal areas as well as the open sea. There are relatively few islets off the Hankoniemi peninsula, so the effects may extend to the mainland coast. The coastal waters off Hanko are important not only in terms of nature conservation but also for research into marine ecosystems. The maps annexed to the EIA programme describe areas to be protected, but the extensive Ramsar area of the Hankoniemi-Tammisaari archipelago is missing from annex 5.

Mainland supply bases for the pipeline work

According to the Project Information Document:

“The large-scale offshore construction work necessitates considerable support from land-based supply bases. These include pipeline stores – corrosion/weight coated or non-coated pipelines – coating facilities and coating materials, and general stores for supply of consumables to the offshore fleet, e.g. spares, fuel, tools, valves, flanges and fittings, marine supplies (e.g. ropes, wires anchors), and managerial support from Nord Stream and Contractors. Helicopter support both for the installation phase and for the operational phases may also be required.

A Study on the logistics of construction works and thereby also the number and locations of the needed supporting facilities on shore will be conducted in the beginning of 2007, when the detailed technical design commences. Descriptions and assessments of the potential locations for support facilities will be included in the offshore environmental impact assessments. Supporting facilities will naturally be subject to national permitting.”

The EIA programme makes no mention of the examination of the impacts of supply bases to be located on land. The programme states at a very general level that:

“The project is unlikely to have any impact on the community structure, townscape, buildings or landscapes in the Finnish area. The impacts of the project on the entities in question will be looked into at a general level, and if it is found that the project will have an impact on them, then the impacts will be assessed in more detail.”

It is more than likely that there will be a need for the supply bases described in the Project Information Document in places other than the head and end of the pipeline in Russia and Germany. It is most likely that these kinds of supply bases will be required on the shores of the Gulf of Finland, primarily at the mouth of the Gulf of Finland. If this supposition is correct, then locating such a supply base in the Hankoniemi peninsula will be considered, possibly even planned in the near future.

It must be ascertained first of all where it would be possible to find a sufficient area for the activities that are mentioned in the description of the project (see above). The area must have a sufficiently suitable harbour and adequate land transport connections. The area must be large enough in size so that equipment such as parts for the gas pipeline can be stored and coated there. Because the pipes will be coated with a 40–150mm thick layer of reinforced concrete, this will require a considerably large quantity of materials. The pipe coating work and storing of the materials required for it will demand a considerable amount of space.

The EIA of the supply bases must cover at least the following matters:

- the suitability of the supply base of the activities
- the necessary preparatory measures, such as clearing and levelling the land
- the organization of land and sea transport connections
- the storing of materials
- clarification of the acquisition of the materials needed for the concreting
- recruitment of personnel (from Finland or other countries)
- accommodation for personnel and leisure time
- prevention of emissions into the environment
- minimizing the harmful effect of noise
- minimizing the harmful effect of traffic
- minimizing damage caused to landscapes

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