



# Chapter 3

## Legal Framework and Public Consultation



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## 3 Legal Framework and Public Consultation

### 3.1 Legal Framework

The environment of the Baltic Sea is regulated by several international and national bodies of legislation. This legislation is of importance when assessing the environmental impact of the Nord Stream gas pipeline. The following provides for an overview on the most important legal implications. In order to avoid repetition it references to other chapters of this Report in which the reader will be received guidance in more detail.

#### 3.1.1 UN Convention on the Law of the Sea

The United Nations Convention on the Law of the Sea (UNCLOS) regulates the utilization and exploitation of the oceans. The UNCLOS also obliges each coastal state to protect the marine environment (UNCLOS article 192, Part XII, Protection and preservation of the marine environment). In short: The Convention gives a developer the right to lay down pipelines, but it must be done with - among other things - due respect to the environment.

Concerning such laying of submarine cables and pipelines on the continental shelf UNCLOS Art 79 states the following:

1. *"All States are entitled to lay submarine cables and pipelines on the continental shelf, in accordance with the provisions of this article.*
2. *Subject to its rights to take reasonable measures for the exploration of the continental shelf, the exploitation of its natural resources and the prevention, reduction and control of pollution from pipelines, the coastal State may not impede the laying or maintenance of such cables and pipelines.*
3. *The delineation of the course for the laying of such pipelines on the continental shelf is subject to the consent of the coastal State.*
4. *[...]"*

The pipeline is planned to be situated in the waters, i.e. the territorial waters and/or the exclusive economic zone (EEZ), as the case may be, of Russia, Finland, Sweden, Denmark and Germany. According to the UNCLOS these countries have the sovereign right and obligation for permitting the Nord Stream pipeline with due respect of the environment.

Finland, Sweden, Denmark, Germany and Russia are all parties to the UNCLOS and have implemented the necessary legislation for the territorial sea, the continental shelf and the EEZ.

### 3.1.2 UN Convention on Environmental Impact Assessment (EIA) in a Transboundary Context – the Espoo Convention<sup>(1)</sup>

The UN Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) stipulates the obligations of parties to assess the environmental impact of the Nord Stream gas pipeline at an early stage of planning. It also lays down the general obligation of States to notify and consult each other on whether a project on their territory is likely to have a significant adverse transboundary environmental impact.

The competent authorities of Germany, Denmark, Sweden, Finland and Russia have in a meeting on the 19<sup>th</sup> of April 2006 unanimously concluded that the Nord Stream Project falls under article 3 of the Espoo Convention. The sole nature of the Nord Stream Project – a 1,220 km long offshore nature gas transmission pipeline system – gives rise to transboundary environmental impacts among the countries where the pipelines shall be built. Potentially, also transboundary environmental impacts to 3<sup>rd</sup> parties may occur.

The Espoo Convention has been incorporated into the EU EIA Directive 85/337/EEC with later amendments which again has been implemented into the national legislation of the EU Member States.

The Russian Federation has signed but yet not ratified the Convention. But with regard to the Nord Stream Project, Russia is acting as a Party of Origin to the extent possible under its legislation. Hence, for the purpose of this Espoo Report the term "Parties of Origin (PoO)" as used herein shall include the Russian Federation.

**Table 3.1** shows how the concerned parties have been classified.

### 3.1.3 Helsinki Convention

Other international legislation that also is of interest is the Helsinki Convention on the Protection of the Marine Environment of the Baltic Sea Area.

The Convention has a special focus on pollution of the Baltic Sea originating from many sources and introduced by man. The Convention obliges the parties of the Convention "*to take all appropriate measures to prevent and abate pollution*" (Article 3.1.) if such should come from the pipeline.

Of special interest will be discarded conventional and chemical munitions which can be found throughout the Baltic Sea.

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(1) For more detailed information on the Espoo Convention, Parties of Origin and Affected Parties please consult **Chapter 1, 1.2, 1.3** – Introduction and Guidance to the Reader- and **Chapter 11, 11.1** - Transboundary Impacts.

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All countries around the Baltic Sea are Parties to the Convention.

### 3.1.4 EU Directive on Environmental Impact Assessment

Council Directive 85/337 of June 27 1985 on the assessment of the effects of certain public and private projects on the environment and Council Directive 97/11 of March 3 1997 amending Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment.

Like the Espoo Convention the EU Directive also obliges the developer to assess the impact of the Nord Stream gas pipeline on the environment.

*Art 2. Member States shall adopt all measures necessary to ensure that, before consent is given projects likely to have significant effects on the environment by virtue, inter alia, of their nature, size or location are made subject to a requirement for development consent and an assessment with regard to their effects. These projects are defined in Article 4.*

*Art 4. Subject to Article 2, projects of the classes listed in Annex I shall be made subject to an assessment in accordance with article 5 to 10.*

*Annex I, Section 16)-- Pipelines for the transport of gas, oil or chemicals with a diameter of more than 800 mm and a length of more than 40 km.*

The Directive also obliges the Member States to have hearings of the public and of competent authorities in their countries and where the environment of another state is likely to be significantly affected to ask this state if it intends to participate in the environmental impact assessment process of the project.

### 3.1.5 Natura 2000

Natura 2000 is an EU wide network of nature protection areas established under the 1992 Habitats Directive. The aim of the network is to assure the long term survival of Europe's most valuable and threatened species and habitats. It comprises of special areas of conservation (SAC), designated by Member States under the Habitats Directive and also incorporates Special Protection Areas (SPA) which they designate under the 1997 Birds Directive.

Council Directive 92/43 (EEC) of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora:

*Art 3.1. A coherent European ecological network of special areas of conservation shall be set up under the title Natura 2000. This network composed of sites hosting the natural habitat types*

*listed in Annex I and habitats of the species listed in Annex II, shall enable the natural habitat types and the species' habitats concerned to be maintained or, where appropriate, restored at a favorable conservation status in their natural range.*

*The Natura 2000 network shall include the special protection areas classified by Member States pursuant to Directive 79/409/EEC. (Birds Directive).*

*Art. 3.2 Each Member State shall contribute to the creation of Natura 2000 in proportion to the representation within its territory of the natural habitat types and the habitats of species referred to in paragraph 1. To that effect each Member State shall designate, in accordance with Article 4, sites as special areas of conservation taking account of the objectives set out in paragraph 1.*

All EU Member States around the Baltic Sea have designated such special areas of conservation, both on land and in the sea. These areas need special attention assessing the environmental impact of the Nord Stream pipeline.

### **3.1.6 The national permitting procedures within the five Parties of Origin - Overview**

Nord Stream is required to submit various national applications in order to obtain permits for the construction and operation of the gas pipeline. As the pipeline is planned to be situated in the waters, i.e. the territorial waters and/or the exclusive economic zone (EEZ), of Russia, Finland, Sweden, Denmark and Germany Nord Stream has submitted the adequate documentation in pursuit of such permits in each of these five jurisdictions. The following provides for a brief overview on the permitting situation in each country concerned:



State	Legislation in EEZ and Territorial Water
Russia	<p><i>Federal laws</i> about            Internal Sea Water, Territorial Sea and Nearest Zone of Russian Federation            Continental Shelf of Russian Federation            Exclusive Economic Zone of Russian Federation            Environmental Expertise</p> <p><i>Decree of the Government of Russia</i> about            Approving the Order of Laying of Undersea Cables and Pipe lines in Internal Sea Water and in Territorial Sea of Russian Federation</p>
Finland	<p><i>EIA</i> according to:            The Finnish EIA Act (468/1994)  <i>Government's approval for the activity and to the delineation of the course for the pipelay (the exploitation right)</i> according to:            The Finnish Act on the EEZ (Act 1058/2004)  <i>Permit</i> for construction according to:            The Water Act (Act 264/1961)  <i>Permit</i> for munitions clearance according to:            The Water Act (Act 264/1961)</p>
Sweden	<p><i>Permit</i> to construct the pipelines:            Act on the Continental Shelf (Act 1966:314)            No EIA is expressly required for the construction of the pipelines under the Continental Shelf Act. Nord Stream has nevertheless filed an Environmental Study.</p>
Denmark	<p><i>Permit</i> to construct and operate pipelines according to:            Act on the Continental Shelf (1101:2005, 548:2007, 1400:2008) as specified in administrative order (361:2006) on Certain Pipeline Installations for Transport of Hydrocarbons in Territorial Waters and on the Continental Shelf and administrative order (2000:884) on Environmental Impact Assessment (EIA) of Projects for Extraction of Hydrocarbons and for Installation of Transit Pipelines in Danish Territorial Waters and Continental Shelf.  <i>The EIA</i> is an integrated part of the permitting procedure.</p>
Germany	<p><i>Plan Approval Procedure</i> for construction in territorial water and the landfall:            Energy Industry Act (EnWG)  <i>Two Permits</i> for construction in EEZ            Federal Mining Act (BBergG)  <i>The EIA</i> is parallel to and integrated in the permitting procedure.</p>

### National: Bilateral agreements

Bilateral Agreements on the execution of an EIA for projects with transboundary impacts. These bilateral agreements may bear some additional requirements limited to the states which have entered into same.

Finland-Estonia	EIA Agreement of February 21, 2002 applies.
Germany-Poland	EIA Agreement of April 11, 2006 applies.

## 3.2 Public Consultation

### 3.2.1 Introduction

This chapter summarizes public consultation activities on the Nord Stream Project and provides an overview of the results of stakeholder engagement to date. The approach of the Project to future stakeholder engagement is also presented.

Nord Stream has been following an extensive and transparent communications strategy using various communications channels to disseminate information about the Project. It is Nord Stream's aim to hold regular, genuine dialogue with interested parties. Nord Stream's website serves as a constantly updated project information platform for all stakeholders. Additional means of providing information on the Project include regular newsletters, press releases, an interactive multimedia presentation and a truck-mounted mobile information exhibit which is traveling and will continue to travel to major cities at and near the Baltic Sea coast. Initiation and participation in stakeholder and media events as offer additional opportunities to foster the dialogue between the interested parties and the Project.

The Espoo Convention defines the country in which the proposed activity, which is the focus of consultation, takes place as the "Party of Origin" and the countries that are impacted as each an "Affected Party". The Project will pass through the Exclusive Economic Zones and/or territorial waters of Russia, Finland, Sweden, Denmark and Germany hence each of these countries is a Party of Origin. Russia, Finland, Sweden, Denmark and Germany, as well as the other littoral countries of the Baltic Sea, i.e. Estonia, Latvia, Lithuania and Poland, are each an Affected Party, as these countries will each be subjected to impacts from Project related activities and events that are initiated in one or more of the other countries through which the pipelines will pass. Estonia, Latvia, Lithuania and Poland being Affected Parties but not Parties of Origin are referred to in the Espoo Report as "Only Affected Parties" to distinguish them as a group from the Party of Origin countries.

**Table 3.1 Country designations according to the Espoo Convention**

Designation used in this Report	Applicable Countries
Party of Origin (PoO)	Russia <sup>(1)</sup> , Finland, Sweden, Denmark and Germany
Affected Party (AP)	Estonia, Latvia, Lithuania, Poland, Russia, Finland, Sweden, Denmark and Germany
Only Affected Party (OAP)	Estonia, Latvia, Lithuania and Poland

Finland, Sweden, Denmark and Germany have equal status within the Convention. Russia has signed but not ratified the Convention. It is, however, participating in the Nord Stream Project Espoo consultation process as a Party of Origin to the extent possible under its legislation.

### 3.2.2 Process Initiation

The Espoo notification procedure for the Nord Stream Project was formally initiated with the Notification of the Project in November 2006. Nord Stream AG submitted a Project Information Document (PID), "Offshore Pipeline through the Baltic Sea (November 2006)" on the planned pipeline to the appointed responsible national authorities of Finland, Sweden, Denmark, Germany and Russia in accordance with the Espoo Convention.

The Espoo notification procedure took place from November 2006 to February 2007. It commenced with the Parties of Origin simultaneously sending notification letters to all Affected Parties. The letter was accompanied by the PID. The Affected Parties also disseminated the notification among their relevant authorities and conducted public consultations in accordance with national legislation and procedures.

In the process of identifying the best route for the pipelines the Project investigated several additional route alternatives. Nord Stream decided to change the original proposed route in a number of places and has prepared two route information documents titled "Status of the Nord Stream pipeline route in the Baltic Sea (October 2007)" and "Status of the Nord Stream Route in Denmark and Germany (October 2008)".

This additional information was disseminated in November 2007 and November 2008 respectively in the same manner as the notification. Additional comments were submitted to Nord Stream by national stakeholders on the basis of these documents. Nord Stream has taken stakeholder comments into consideration and elaborated the Nord Stream Route and the

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(1) Although the Russian Federation is not a Party to the Espoo Convention yet, Russia is acting as a Party of Origin to the extent possible according to its national legislation.

alternatives described in this document. The Route Information Documents initiated additional phases in the Project-related consultations that are outlined in the following.

Sixteen meetings comprising Parties of Origin as well as the Only Affected Parties were conducted between 19 April 2006 and to date. Designated country representatives met with one another and the project developer regularly to agree on the procedure to assess the progress of the preparation of the Espoo report and to discuss and agree on the next steps. In addition two Expert Meetings aimed at discussing common EIA standards were organised by the Parties of Origin.

**Table 3.2 Consultation Calendar –Meetings of Baltic Sea Countries in the framework of the Espoo Convention on Environmental Impact Assessment (EIA) in a transboundary context**

Consultation meetings, initiatory meetings and expert meetings		
Date and Location	Meeting	Attendees
19 April 2006; Hamburg, Germany	Initiatory meeting	Competent authorities of Parties of Origin
20 April 2006; Hamburg, Germany	Initiatory meeting	Competent authorities of Parties of Origin and Affected Parties
9 May 2006; Hamburg, Germany	Consultation meeting	Competent authorities of Parties of Origin
28-29 August 2006; St Petersburg, Russia	Consultation meeting	Competent authorities of Parties of Origin
17 October 2006 Hamburg, Germany	Consultation meeting	Competent authorities of Parties of Origin
7 November 2006; Copenhagen, Denmark	Consultation meeting	Competent authorities of Parties of Origin and Affected Parties
6 February 2007; Helsinki, Finland	Consultation meeting	Competent authorities of Parties of Origin and Affected Parties
20-21 March 2007; Stockholm, Sweden	Consultation meeting	Competent authorities of Parties of Origin
7-8 June 2007; Hamburg, Germany	Expert meeting on common EIA standards and methods	Experts designated by the Affected Parties
21-22 August 2007; Berlin, Germany	Consultation meeting	Competent authorities of Parties of Origin and Affected Parties
8-9 October 2007; Bornholm, Denmark	Consultation meeting	Competent authorities of Parties of Origin and Affected Parties
6-7 February 2008; Hamburg, Germany	Consultation meeting	Competent authorities of Parties of Origin and Affected Parties
29-30 May 2008; Moscow, Russia	Consultation meeting	Competent authorities of Parties of Origin and Affected Parties
16-17 September 2008; Hamburg, Germany	Expert meeting on findings of environmental study and impact assessment	Experts designated by the Affected Parties
17-18 September 2008; Hamburg, Germany	Consultation meeting	Competent authorities of Parties of Origin and Affected Parties
15-16 December 2008; Zurich, Switzerland	Consultation meeting	Competent authorities of Parties of Origin and Affected Parties
23 January 2009; Berlin, Germany	Consultation meeting	Competent authorities of Parties of Origin
13 February 2009; Copenhagen, Denmark	Consultation meeting	Competent authorities of Parties of Origin and Affected Parties

<b>Public hearings and Scoping meetings</b>		
<b>Date and Location</b>	<b>Meeting</b>	<b>Attendees</b>
14 November 2006; Helsinki, Finland	Public hearing	Competent authorities Government representatives Non governmental organisations General public/communities
29 November 2006; Stockholm, Sweden	Public hearing	Competent authorities Government representatives Non governmental organisations General public/communities
30 November 2006; Visby, Sweden	Public hearing	Competent authorities Government representatives Non governmental organisations General public/communities
11 December 2006; Helsinki, Finland	Public hearing	Competent authorities Government representatives Non governmental organisations General public/communities
12 December 2006; Hanko, Finland	Public hearing	Competent authorities Government representatives Non governmental organisations General public/communities
13 December 2006; Kotka, Finland	Public hearing	Competent authorities Government representatives Non governmental organisations General public/communities
14 December 2006; Turku, Finland	Public hearing	Competent authorities Government representatives Non governmental organisations General public/communities
18 December 2006; Tallinn, Estonia	Public hearing	Competent authorities Government representatives Non governmental organisations General public/communities
11 January 2007; Bornholm, Denmark	Public hearing	Competent authorities Government representatives Non governmental organisations Relevant general public/communities
22 January 2007; Visby, Sweden	Public hearing	Competent authorities Government representatives Non governmental organisations General public/communities
30 January 2007; Stralsund, Germany	Scoping meeting	Competent authorities Government representatives Non governmental organisations General public/communities
23 November 2007; Vyborg, Russia	Public hearing	Competent authorities Government representatives Non governmental organisations General public/communities

**Table 3.3 Public Consultation – Parties of Origin**

Country	Public consultation based on notification
<b>Denmark</b>	<p>The PID was announced and was posted on the website of the Danish Energy Authority. The public was able to register comments until 26 January 2007. During the same period, the documentation was available at the libraries of Copenhagen, Rønne (Bornholm) and in the cities of Esbjerg, Odense, Ålborg and Århus. A public hearing was conducted on 11 January 2007 on the island of Bornholm with the participation of Nord Stream AG.</p>
<b>Finland</b>	<p>Information on the public hearing of the assessment programme was provided in accordance with the Finnish EIA Act and Decree in the following national newspapers: Helsingin Sanomat, Hufvudstadsbladet, Turun Sanomat, Åbo Underrättelser and Kymen Sanomat.</p> <p>The assessment programme was announced and was made available for public consultation from 27 November 2006 to 26 January 2007 in the coastal municipalities of the Gulf of Finland, in the municipalities of the southern parts of the Archipelago Sea and on the Internet.</p> <p>The Project was presented at events held between 11-14 December 2006 in Helsinki, Hanko, Kotka and Turku. In addition, a separate presentation for authorities was held in Helsinki.</p>
<b>Germany</b>	<p>The applications for the procedures under the Energy Industry Act (EnWG) and the Federal Mining Act (BBergG), including a scoping document, were available for public consultation from 27 November 2006 to 12 January 2007. The documentation was also sent to authorities and NGOs (including WWF, NABU and BUND Mecklenburg-Western Pomerania).</p> <p>The document recipients and the German public had the opportunity to comment on the necessary research for the EIA. A public scoping meeting 'or Scoping Conference' to discuss comments received from public agencies and the public during the consultation procedure took place in Stralsund on 30 January 2007. On 13 April 2007 the competent authorities formally defined the scope of research or 'investigation framework' for the Espoo Report.</p> <p>Information on the German permitting procedure is available to the public on the BSH website at:</p> <p><a href="http://www.bsh.de/de/Meeresnutzung/Wirtschaft/Rohrleitungen/Nord_Stream_Gas_Pipeline/Genuehmigungsverfahren_in_Deutschland.jsp">http://www.bsh.de/de/Meeresnutzung/Wirtschaft/Rohrleitungen/Nord_Stream_Gas_Pipeline/Genuehmigungsverfahren_in_Deutschland.jsp</a>.</p>

Country	Public consultation based on notification
<b>Sweden</b>	<p>The PID was announced and was made available on the website of the Swedish Environmental Protection Agency (EPA). The public was able to register comments until 16 February 2007. Public meetings were arranged jointly with Nord Stream AG in Stockholm and Visby (Gotland) from 29-30 November 2006. In parallel, Nord Stream AG conducted national consultations according to the Swedish Environmental Code.</p>
<b>Russia</b>	<p>The Project was presented at meetings with representatives from the media, public organisations and experts of the North-West Region in St. Petersburg in June 2007 and in Riga in May 2008. Both meetings were organized by the Russian Regional Environmental Center (RREC) which has the mandate to manage and initiate public involvement in EIAs.</p> <p>Public hearings on the preliminary EIA and assessment programme were carried out in Vyborg in November 2007. According to Russian EIA regulations, information about the public hearings was published one month prior to the hearings in the following federal, regional and local newspapers: Rossiyskaya Gazeta (federal); Vesty (regional - Leningradskaya oblast), Sankt-Petersburg Vedomosti (regional – St Petersburg); Vyborg (local).</p> <p>The assessment programme and preliminary EIA were available to the public from 23 October 2007 to 23 December 2007 in the public library of Vyborg, in Vyborg town hall and on the Internet. Copies were also sent to a number of concerned public organisations and experts in the North-West Region.</p>



**Table 3.4 Public Consultation – Only Affected Parties**

Country	Public consultation based on notification
<b>Poland</b>	Members of the public and the relevant authorities were informed about the proposed activity and were given the opportunity to study the information in the PID. Furthermore, consultation procedures with the authorities were conducted in the provinces of Warmińsko-Mazurskie, Pomorskie and Zahodnio- Pomorskie, all of which border the Baltic Sea.
<b>Lithuania</b>	The Project was announced in national newspapers and the PID was published on the ministry's website. The document was also distributed to relevant institutions and authorities.
<b>Latvia</b>	The media was informed about the proposed Project. In addition, information was provided to relevant public authorities, scientific institutions, NGOs and the general public. The PID was available on the websites of the Latvian Ministry of the Environment and the Environment State Bureau for a two-month period up to 16 February 2007.
<b>Estonia</b>	The Ministry of Environment organised the consultation procedure with authorities. The PID was published in national newspapers and was also submitted to national authorities and NGOs during a one-month consultation period. A public hearing was held in Tallinn on 18 December 2006 with the participation of Nord Stream AG.

Nord Stream is also maintaining an informal ongoing dialogue with a range of stakeholders such as NGOs and potentially affected communities.

### 3.2.3 Disclosure of the Espoo Report

After the notification phase and based on the findings of the joint meetings the Espoo Report for the Nord Stream Project has been prepared. The Espoo Report gives a transboundary overview of the entire Project and comprises a summary of the contents of all Project-related national EIAs. It serves as basis for public consultation.

### 3.2.4 Issues Raised by Stakeholders and Project Responses

Nord Stream has received more than 200 comments so far. Approximately 80 per cent of the comments came from authorities (60 per cent from state authorities and 20 per cent from regional/municipal authorities). The remaining 20 per cent of the comments came from NGOs and other groups of stakeholders, including environmental agencies and research institutions. Comments submitted by private individuals or private sector organisations comprise less than one per cent of the comments received.

This section of the Espoo Report presents the key areas of interest raised by stakeholders and summaries of the specific issues raised. **Table 3.5** provides an overview of stakeholder issues and the responses made by Nord Stream. In general, key issues have been raised by all categories of stakeholders and the Project has taken great care in addressing them in the Project's design and planning wherever feasible.

**Table 3.5 Stakeholder Issues and Project Responses**

Issue	Comments	Project Response
<b>Impacts from the Project</b>	<b>Timelines and Phases:</b> Environmental impacts should be considered for all Project phases and <b>geographical</b> sections of the Project.	The environmental assessment carried out by the Project has assessed impacts at each stage in the project's lifecycle and has also looked at impacts at an ecological sub-region level.  <u>Key Espoo Report Reference:</u> Chapter 9: Impact assessment
<b>Need to address specific environmental conditions of the Baltic</b>	<b>Special environmental conditions:</b> The special environmental conditions and vulnerability of the Baltic maritime environment must be taken into account. Key factors include: <ul style="list-style-type: none"> <li>- Already heavily used by shipping</li> <li>- Biotope loss</li> <li>- Over enrichment by nutrients / eutrophication</li> <li>- Brackish water</li> <li>- Shallow vs. deep areas</li> <li>- High level of pollution and current ecological sensitivity</li> <li>- Reduced populations of marine life</li> </ul>	The environmental assessment carried out by Nord Stream has focused on surveying and modeling conditions that are specific to the Baltic and has taken account of the specific issues raised by stakeholders.  The assessment has drawn upon a wide range of research on the Baltic Sea as well as on the results of surveys specifically commissioned by the Project.  <u>Key Espoo Report Reference:</u> Chapter 8. Baseline Description Chapter 9: Impact assessment
<b>Key environmental categories of impacts to be included</b>	<b>Impacts to specific attributes to be considered:</b> Impacts to be considered should include: <ul style="list-style-type: none"> <li>- Impacts on seafloor (including dredging that may bring up certain deposits including munitions and poison gas / open water and water quality</li> <li>- Impacts on trophic relationships, pesticides and oxygen absorbing substances</li> <li>- Impacts on natural conditions</li> <li>- Impacts on conservation areas</li> <li>- Impacts due to major damages to the pipelines</li> <li>- Impacts to currents and how they may be altered because of the pipelines</li> </ul>	Each of these specific issues has been taken into account by the Project. The conservative assessment of possible impacts has been supported by modelling and expert knowledge. The results have been included in the Espoo Report and presented at an eco-sub-regional level to provide greater detail.  <u>Key Espoo Report Reference:</u> Chapter 9: Impact assessment

Issue	Comments	Project Response
	<ul style="list-style-type: none"> <li>- Impacts on Baltic ecosystem (including flora and fauna (both marine and terrestrial) including vulnerable biotypes)</li> <li>- Impacts on conventional and chemical munitions</li> </ul>	
	<p>Considering the number of specific environmental concerns the Project should seek to relocate the routing of the pipeline to minimize impacts</p>	<p>The appraisal of route alternatives carried out by Nord Stream has involved the use of a series of environmental, socio-economic and technical evaluation criteria to guide the development and detailed design of the Nord Stream Route.</p> <p><u>Key Espoo Report Reference:</u> Chapter 6: Alternatives</p>
<b>Trans-boundary Impacts</b>	<p>Potential cross border effects like dispersal of sediment, accidents, physical disruptions, noise should be clearly stated.</p> <p>The list of transboundary impacts must include:</p> <ul style="list-style-type: none"> <li>- Benthic organisms</li> <li>- Fisheries</li> <li>- Hazards to populations of mammals</li> </ul>	<p>The assessment carried out for the Espoo Report is based on specific modeling and solid regional base data that allowed for a detailed assessment of potential transboundary impacts from the Project.</p> <p><u>Key Espoo Report Reference:</u> Chapter 11: Transboundary Impacts</p>
<b>Socio economic considerations</b>	<p><b>Specific issues to be considered:</b></p> <ul style="list-style-type: none"> <li>- Impacts on shipping</li> <li>- Impacts on people's living conditions and safety</li> <li>- Impacts on cultural heritage (due to seabed intervention works)</li> <li>- Impacts on tourism and recreational use</li> <li>- Impacts on the utilisation of natural resources</li> </ul>	<p>The Project has gathered detailed information on the socio-economic receptors that could be impacted by Project activities. Expected future developments in shipping traffic and natural resource exploitation have been taken into account. The impact assessment includes a specific section on potential socio-economic impacts.</p> <p><u>Key Espoo Report Reference:</u> Chapter 8. Baseline Description Chapter 9: Impact assessment</p>
<b>Natura 2000 Areas</b>	<ul style="list-style-type: none"> <li>- Natura 2000 areas have to be protected both from threats within the area and from threats from surrounding areas.</li> <li>- The impact on established Natura 2000 areas should be assessed and route alternatives that are farther from should be considered</li> </ul>	<p>The Nord Stream Route has been optimised so as not to cross designated Natura 2000 sites along most of its length to avoid potential impacts on any conservation areas or species that they protect. Various route alternatives have been assessed with the objective of minimizing impact.</p> <p>A summary of the Project's impacts on</p>

Issue	Comments	Project Response
		<p>Natura 2000 sites based on the work carried out by the EIA teams in Denmark, Germany, Finland and Sweden is part of the Espoo report. Where a detailed assessment is required this has been produced by the Project in accordance within national requirements</p> <p>Mitigation measures have been identified to minimize possible impacts on Natura 2000 sites.</p> <p><u>Key Espoo Report Reference:</u> Chapter 6: Alternatives Chapter 9: Impact assessment Chapter 10: Natura 2000</p>
<b>Cumulative impacts</b>	<ul style="list-style-type: none"> <li>- Indirect impact of cumulative effects should be taken into account</li> <li>- Cumulative effects caused by future developments in the Baltic Sea should be assessed.</li> </ul>	<p>The Espoo Report addresses cumulative impacts where applicable.</p> <p><u>Key Espoo Report Reference:</u> Chapter 6: Alternatives Chapter 9: Impact Assessment</p>
<b>Minimising impact on fish and fisheries</b>	<p><b>Specific issues to be considered:</b></p> <ul style="list-style-type: none"> <li>- Fish spawning and nursing grounds will need to be carefully considered.</li> <li>- Specific information should be given on the species affected, when they are affected and the effects of these interactions on the fishing grounds.</li> <li>- Spawning and juvenile stages to be considered.</li> <li>- Food resources of fish also need to be considered.</li> <li>- The risk of accidents and damage to the pipeline in connection with trawl fishing should be especially considered</li> </ul>	<p>The Project has used a wide variety of information, including surveys, public databases and expert knowledge in the development of the environmental baseline. Up-to-date data on fish species, fish habitats and sensitivities served as the basis for the impact assessment and for the development of mitigation measures. The Project's interaction with fisheries is also described in this report. The design of the Nord Stream Route has explicitly taken account of the findings in the appraisal of route alternatives.</p> <p>The risk assessment carried out for the Espoo Report has assessed the probability of accidents and damage to trawlers from the presence of the pipeline.</p> <p><u>Key Espoo Report Reference:</u> Chapter 5: Risk Assessment Chapter 6: Alternatives Chapter 8. Baseline Description Chapter 9: Impact assessment</p>

Issue	Comments	Project Response
<b>Minimising impact on benthos</b>	<p><b>Mapping technologies and requirements:</b></p> <ul style="list-style-type: none"> <li>- Detailed mapping of existing biotype structures and possible occurrence of macrophytes should be undertaken</li> <li>- Video assisted surveying proposed by the assessor will require augmentation with diver-assisted surveys</li> <li>- The Project should map epifauna with side scan sonar tracks</li> </ul> <p><b>Research required on impacts on benthos:</b></p> <ul style="list-style-type: none"> <li>- Likelihood of gas pipeline interfering with the strength, direction and range of benthic currents</li> <li>- The seabed intervention work could weaken the living conditions of the seabed zoobenthos.</li> <li>- Zoobenthos communities can be affected during exploitation of the pipeline as a result of changes in physical and biological conditions</li> </ul>	<p>The environmental assessments for the Espoo Report have carried out extensive research on the distribution and status of benthic communities along the Nord Stream Route. Samples were taken in several surveys to identify benthic habitats, thus directly addressing the need for specific surveys on this receptor. The results of this research has been mapped and incorporated into the specific sections of the Baseline and Impact Assessment chapters of the Espoo report.</p> <p>Concerns over benthic communities have also been taken into account in the Project's appraisal of route alternatives.</p> <p>Based on the assessment results adequate mitigation measures, including the adjustment of seabed intervention works, were developed by the Project.</p>
	<p><b>Construction effects on benthos:</b></p> <ul style="list-style-type: none"> <li>- Seabed intervention works affecting sludge accumulation</li> <li>- Algal blooms and their increase due to dredging</li> <li>- Methods of transporting sediments should be discussed</li> </ul>	<p><u>Key Espoo Report Reference:</u> Chapter 6: Alternatives Chapter 8. Baseline Description Chapter 9: Impact assessment</p>
<b>Impacts on Marine Mammals</b>	<p><b>Specific issues to be considered:</b></p> <ul style="list-style-type: none"> <li>- Impacts on marine mammals should be carefully considered and minimised.</li> <li>- The EIA should consider updated and detailed data on the distribution of mammals and related habitat.</li> <li>- Possible impacts arising from habitat disruption (e.g. noise emissions, disturbance of seabed, munitions, and turbidity) must be examined.</li> <li>- Pay particular attention to vulnerable species (e.g. Ringed Seal)</li> </ul>	<p>The possible impact of the Project on Marine mammals has been thoroughly assessed. The latest information on the distribution of marine mammals and their behaviour has been used to identify the potential impact of the different phases of the Project and to develop adequate mitigation measures. The Project has used the most recent data and information on the Baltic Sea that was available. It has also used experts from Baltic countries and specially commissioned surveys to provide additional inputs to the assessment.</p> <p>Both the Nord Stream Route and the construction plan have been designed to minimize impacts on marine mammals by the Project</p> <p><u>Key Espoo Report Reference:</u></p>

Issue	Comments	Project Response
		Chapter 6: Alternatives Chapter 8. Baseline Description Chapter 9: Impact assessment
<b>Minimising impact on birds</b>	<p><b>Specific issues to be considered in the impact assessment:</b></p> <ul style="list-style-type: none"> <li>- Migratory birds especially in connection with possible accidents</li> <li>- EU bird sanctuary zones must be taken into account</li> <li>- Survey territory should be 3000m on either side of Project territory</li> <li>- Effects of laying and operation on wintering areas (e.g. for long tailed duck) should be considered</li> <li>- Consider all important bird life and fish areas as per Espoo Convention</li> <li>- Pipeline will enter Baltic Sea where Whooper Swan, Caspian tern, and Barnacle goose are found</li> <li>- Long tailed ducks and Auks research should be included</li> <li>- Avifauna, resting areas and bird species that feed on bottom dwellers</li> </ul> <p><b>Specific issues to be considered concerning construction:</b></p> <ul style="list-style-type: none"> <li>- Installation of the pipeline should take place in periods where no detrimental effects can occur</li> <li>- Timeline of installation work should be drawn up to minimize the impact on various bird species</li> </ul> <p><b>Further research requirements:</b></p> <ul style="list-style-type: none"> <li>- Surveying and registration of seabirds</li> <li>- Nesting, resting and feeding areas should be understood</li> <li>- Timeline of construction</li> </ul>	<p>The Project has carried out research on the current distribution patterns and status of birds along the Nord Stream Route. In response to the sensitivities identified the construction schedule has been set up so as to minimise impacts on birds.</p> <p>Detailed information has been incorporated into the specific sections of the Baseline and Impact Assessment chapters. Concerns over potential impacts on birds have also been incorporated into the Project's appraisal of route alternatives.</p> <p><u>Key Espoo Report Reference:</u> Chapter 6: Alternatives Chapter 8. Baseline Description Chapter 9: Impact assessment</p>
<b>Archaeo-logical/ Cultural Heritage along the Route</b>	<p><b>Specific issues to be considered:</b></p> <ul style="list-style-type: none"> <li>- A detailed geophysical (acoustic) bottom mapping must be done, and this must form the basis for study and interpretation of the marine cultural environment in the area</li> <li>- EIA should reference alteration of pipeline route due to existence of ship wrecks and human settlements</li> <li>- Consideration of risks for and from archaeological / cultural heritage</li> </ul> <p><b>Research to be carried out:</b></p>	<p>The Project has deployed state-of-the-art survey technologies to scan the seafloor to provide a detailed picture of sea floor morphology and objects lying on the seabed. In addition it has also used techniques that show a cross-section of the shallow geology, to provide information on ferrous (iron-based) materials and to allow for a visual analysis of the seafloor.</p> <p>The Project has mapped all objects that</p>

Issue	Comments	Project Response
	<ul style="list-style-type: none"> <li>- Stone Age dwellings should potentially be examined by divers</li> <li>- Ship wreck locations and mapping</li> <li>- Ancient forests and remains of Stone Aged Settlements</li> </ul>	<p>relate to cultural heritage finds. The finds have been identified and mapped. The Nord Stream Route has been optimised to avoid any finds.</p> <p><u>Key Espoo Report Reference:</u> Chapter 6: Alternatives Chapter 8. Baseline Description Chapter 9: Impact assessment</p>
<p><b>Providing fisheries with information of planned activities</b></p>	<p><b>Methods of Communication:</b></p> <ul style="list-style-type: none"> <li>- Facilitate creation of network of to facilitate the dissemination of information regarding the work and repairs to the pipeline.</li> <li>- Dialogue with organisations and authorities involved in fishing</li> <li>- Detailed plan for the installation of work should be provided</li> <li>- A permanent body should be established and assigned the task of keeping the fisheries industry informed of planned activities</li> </ul>	<p>The Project has engaged with fishermen's groups and national fisheries' authorities. This is an ongoing process and will ensure that the activities of fishermen are not significantly impacted by the Project.</p> <p><u>Key Espoo Report Reference:</u> Chapter 9: Impact assessment</p>
<p><b>Minimising impact on tourism</b></p>	<p><b>Specific issues to be considered:</b></p> <ul style="list-style-type: none"> <li>- Noise from pipelaying and supply ships, raised accident risk from ship collisions and the danger of oil spills, sediment particles, sediment deposit, liberation of contaminants, nutrients and oxidising substances cause by upswirl from work on sea floor affecting water quality of bathing water</li> <li>- Precise timings requested for pressure testing pipeline in order to prevent adverse affects on tourism industry</li> <li>- It will be necessary to conduct a survey of public bathing beaches in the zone affected by the Project</li> </ul>	<p>In its assessment of the potential for impacts on tourism the Espoo Report has taken into account the issues raised The concerns have been subject to modeling and expert judgement The Impact Assessment chapter of the report addresses the issues and demonstrates how the Project can minimise its potential impacts on the sector.</p> <p><u>Key Espoo Report Reference:</u> Chapter 9: Impact assessment</p>
<p><b>Minimising impact on military activities</b></p>	<p>Potential interference of the pipeline on military operations in the Baltic during construction and operation</p>	<p>The potential for the Project to affect military operations has been taken into account during the design, process and route selection of the Project. The Impact Assessment chapter of the report deals specifically with potential impacts on military operations.</p> <p><u>Key Espoo Report Reference:</u> Chapter 9: Impact assessment</p>
<p><b>Minimising</b></p>	<p><b>Specific issues to be considered:</b></p>	<p>Risks to shipping have been recognised by</p>

Issue	Comments	Project Response
<b>impact on shipping</b>	<ul style="list-style-type: none"> <li>- The laying of the gas pipeline will partially take place in areas with established shipping routes, which will require shipping to be kept informed as to the progress of work as well as to the impact/disruption it will cause to shipping</li> <li>- Description of possible damage or disruption of shipping by the gas pipeline installation during construction, normal operation, faulty operation, maintenance work and inspection, guarding operations (if any), and/or restricted periods (if any) should be provided</li> <li>- Ships sometimes need to make emergency anchorage; a pipeline in the proposed area would limit the opportunities for emergency anchorage</li> </ul> <p><b>Risks created through:</b></p> <ul style="list-style-type: none"> <li>- Intensification of shipping traffic in already busy passageway of the Gulf of Finland</li> <li>- Shallowness of pipeline is risk to ships and pipelines</li> </ul>	<p>the Project as one of the critical factors in the overall design of the Project and the selection of the Nord Stream Route. In addition, the Risk Assessment and Impact Assessment chapters of the Espoo Report deal explicitly with the issues raised by stakeholders.</p> <p><u>Key Espoo Report Reference:</u> Chapter 5: Risk Assessment Chapter 9: Impact assessment</p>
<b>Avoiding human health / social impacts</b>	<p><b>Specific issues to be considered:</b></p> <ul style="list-style-type: none"> <li>- Accumulation and impact of heavy metals in the water system and marine food chain with regard to human consumption</li> <li>- EIA should continue estimated number of deaths associated with the Project's complete lifecycle and an estimated financial value for any human life lost</li> </ul> <p><b>Safety issues:</b></p> <ul style="list-style-type: none"> <li>- A detailed safety plan to be drawn up to protect people living in or visiting the coastal regions.</li> <li>- Special attention has to be paid to quick flow of information between different parties</li> </ul>	<p>The Project has carried out detailed investigations with the aim to evaluate, prevent and mitigate issues that would lead to impacts on human health and safety. Sediment spreading has been modelled and potential impacts assessed based on multiple surveys and sample results. Wherever necessary the Project will take appropriate mitigation measures in an adequate manner. These issues are addressed in the Risk Assessment and Impact Assessment chapters of the Espoo Report.</p> <p>The Project will ensure good communication channels during both construction and operation of the pipelines.</p> <p><u>Key Espoo Report Reference:</u> Chapter 5: Risk Assessment Chapter 9: Impact assessment Chapter 12: Environmental Management</p>



Issue	Comments	Project Response
		and Monitoring Program
<b>Minimising negative climate effects</b>	<p><b>Specific issues to be considered:</b></p> <ul style="list-style-type: none"> <li>- Ensure that the increased gas consumption would be reconcilable with climate related policy undertakings and long term ambitions in the EU and affected countries.</li> <li>- Describe the Project impacts with regard to climate change, including methane gas and its role in greenhouse gas effect</li> <li>- Assess the risks of gas leakage brought about by the pipeline being located in areas on intense shipping.</li> <li>- Potential environmental impacts caused by possible accidents during the operating phase by the leakage of the gas</li> </ul>	<p>The Project is recognised as being of strategic importance to the European Union's Energy Strategy. In terms of climate change being a transboundary issue the Espoo Report addresses this concern</p> <p>The potential impacts of a gas leakage (an unplanned or accidental event) from the pipeline have been modeled and assessed.</p> <p><u>Key Espoo Report Reference:</u> Chapter 5: Risk Assessment Chapter 8. Baseline Description Chapter 9: Impact assessment Chapter 11: Transboundary Impacts</p>
<b>Seabed Interactions</b>	<p><b>Specific issues to be considered:</b></p> <ul style="list-style-type: none"> <li>- Detailed habitat mapping along the proposed pipeline route</li> <li>- Mapping of anoxic areas along pipeline route and hydrogen sulphide levels present there.</li> <li>- Mapping of nutrient concentrations in the seabed of the Gulf of Finland.</li> <li>- Detailed description of the stretches and the extent to which it is to be buried.</li> <li>- Sludge accumulation on the seabed and the turbidity of the waters during construction</li> <li>- Provide an indication of activities at anchoring sites used for seabed intervention works</li> <li>- Minimize adverse effects of seabed intervention works by selecting the best route</li> <li>- Comprehensive mapping of the seabed is essential</li> </ul>	<p>The Project has carried out detailed work on these issues as only highly detailed information on the seabed and the precise planning of the intervention works ensures the long term safety of the pipelines. Where appropriate, additional surveys and modellings along the route of the pipeline have been undertaken to answer specific issues. The results of these analyses as well as routing optimisations are presented in the Espoo Report.</p> <p><u>Key Espoo Report Reference:</u> Chapter 6: Alternatives Chapter 9: Impact assessment</p>
<b>Avoiding negative impacts on water quality</b>	<p><b>Specific issues to be considered:</b></p> <ul style="list-style-type: none"> <li>- Mud/toxins/sediment dispersal studies/profiles should be mapped out using calculation model</li> <li>- The impacts that the pipeline will have on oxygen levels should be outlined</li> <li>- Provide comment on short term and long term impact on quality of water</li> <li>- Analysis of benthic currents should be</li> </ul>	<p>The Project's potential to have an impact on the Baltic Sea's water characteristics has been thoroughly investigated.</p> <p>The modeling applied a 3D hydrodynamic flow model to investigate the impact of the pipelines' construction and operation on the hydrodynamic and ecological</p>

Issue	Comments	Project Response
	<p>carried out including potentially reduced salt water inflow on Baltic spawning grounds, on benthic fauna and on the birds overwintering in these areas</p> <ul style="list-style-type: none"> <li>- Effluent and waste generation should also be considered and outlined</li> <li>- Ensure that impacts are outlined for all phases of the Project including construction, start up, operations and decommissioning</li> <li>- Ensure impact of pressure test discharge water is also outlined (direct and indirect impacts)</li> </ul>	<p>conditions of the Baltic Sea.</p> <p>The potential impact on water quality through all Project phases has been thoroughly assessed on the basis of survey results, modelling results and use of Baltic Sea expert knowledge.</p> <p>The Project is committed to minimising any identified impacts that might result in an adverse impact on the water quality.</p>
	<p><b>Concerns regarding construction works:</b></p> <ul style="list-style-type: none"> <li>- Installation work may contribute to drawing water containing nutrients (esp. phosphate phosphorous) up from deoxygenated area. Impacts will need to be assessed</li> <li>- There is a risk that environmental toxins and chemical substances may leak out into the water (e.g. in conjunction with dredging)</li> </ul>	<p><u>Key Espoo Report Reference:</u> Chapter 8. Baseline Description Chapter 9: Impact assessment</p>
<p><b>Avoiding impact from releasing pre-commissioning water</b></p>	<p><b>Specific issues to be considered:</b></p> <ul style="list-style-type: none"> <li>- Potential environmental impacts of pressure testing, including related fuel consumption and those arising from discharging of the test water, and any biocides or antioxidants (e.g. FBE, sodium bisulphate, oxygen scavengers) contained within it.</li> <li>- Alternative locations for discharge of pressure test water and alternative substances where toxic material are proposed</li> <li>- Potential impacts of toxins if used without due care and attention as well as for it used "correctly"</li> <li>- Distribution of toxins and other pollutants across the region by sea currents.</li> </ul>	<p>The Project has been developing technologies that minimize potential impacts during the pre-commissioning process. All additives used in pressure-test water treatment already exist in seawater and are harmless to the marine environment at natural concentrations. In any case they rapidly break down in the environment through hydrolysis, oxidation, photo degradation and biodegradation.</p> <p>The Impact Assessment chapter of the Espoo Report contains an assessment of the impacts as well as information on the Project's approach to minimising the impacts from pre-commissioning.</p> <p><u>Key Espoo Report Reference:</u> Chapter 9: Impact assessment</p>

Issue	Comments	Project Response
<b>Avoiding impacts from de-commissioning</b>	<ul style="list-style-type: none"> <li>- Impacts related to decommissioning, dismantling and remove of the gas pipeline should be considered</li> <li>- Consequences of de-commissioning alternatives should be assessed</li> </ul>	<p>The Espoo Report discusses possible approaches to de-commissioning of the pipelines including an analysis of the potential options and the corresponding potential impacts.</p> <p><u>Key Espoo Report Reference:</u> Chapter 9: Impact assessment</p>
<b>Mitigation Measures</b>	<p>Espoo Report should demonstrate mitigation against accidents/negative impacts and account for management of residential EHS risks as far as possible, including:</p> <ul style="list-style-type: none"> <li>- Detailed environmental impact mitigation and minimisation measures</li> <li>- Detailed environmental and social risk management plans</li> <li>- Emergency response planning</li> <li>- Creation of a fishing-free zone around the construction works to prevent confusion and accidents involving fishing fleets</li> <li>- Resources for potential accident areas to assist with emergency responses</li> <li>- For munitions handling activities best available technologies (BAT) to be employed</li> </ul>	<p>The Project has taken stakeholders' concerns into account with regard to mitigation measures in the ongoing design and development of the Project and in the assessments presented in the Espoo Report. The Project applies best available technologies. The Risk Assessment, Impact Assessment, Environmental Management and Monitoring chapters as well as the chapter on Alternatives in the Espoo Report all demonstrate how the Project has addressed and incorporated the mitigation of impacts.</p> <p><u>Key Espoo Report Reference:</u> Chapter 5: Risk Assessment Chapter 6: Alternatives Chapter 9: Impact assessment Chapter 12: Environmental Management and Monitoring Programme</p>
<b>Scope of investigation for alternative offshore routes</b>	<p>Espoo Report must disclose assessment, comparison and justification processes for a variety of alternative routes.</p>	<p>The Espoo Report contains a chapter that sets out the process of route selection and route alternatives and technical alternative analysed by the Project.</p> <p><u>Key Espoo Report Reference:</u> Chapter 6: Alternatives</p>
<b>Cable Crossings</b>	<p><b>Specific issues to be considered:</b></p> <ul style="list-style-type: none"> <li>- Locate and map proposed cable projects</li> <li>- Safety procedures should be outlined</li> <li>- Conditions for crossing should be well understood and should be explained in detail</li> <li>- Incorrect construction and/or operation of the pipeline and, in particular, maintenance activities, could result in damage to our cables at and around the crossing point and</li> </ul>	<p>In the course of the Project design the surveys have been carried out to identify and document the locations of cables in the vicinity of the Nord Stream Route. All cables have been clearly located and mapped. The Project design has also clarified ownership of the cables and developed individual approaches to dealing with any specific issues during the phases of the Project.</p> <p>The Espoo Report takes into consideration</p>

Issue	Comments	Project Response
	the parallel routing section	<p>the issues of existing and future cable routes in the Baltic. This information is presented in the Baseline and Impact Assessment chapters of the Report.</p> <p><u>Key Espoo Report Reference:</u> Chapter 8. Baseline Description Chapter 9: Impact assessment</p>

### 3.2.5 Nord Stream's Stakeholder Engagement Strategy

Nord Stream has developed a Stakeholder Engagement Strategy to assist the Project in developing its long-term consultation and engagement processes. This is in line with international best practice for major infrastructure projects. The process of developing the strategy has involved two complementary stages which are described below.

#### Stage 1: Stakeholder Identification and Analysis

In order to develop an effective strategy for consultation and engagement it was necessary for the Project to determine who the stakeholders are and understand their priorities and objectives in relation to the Project. By classifying stakeholders it has been possible to develop a plan that is tailored to the needs of different stakeholder groups. Recognizing the strategic importance of the Project, a diverse range of stakeholders has been identified that should be involved in the process. Different issues are likely to concern different stakeholders and so different types of stakeholder groups have been identified.

In order to categorise stakeholder groups effectively, key target country groupings of the Project have been prioritised:

- Parties of Origin (Russia, Finland, Sweden, Denmark, Germany)
- Only Affected Parties (Estonia, Latvia, Lithuania, Poland)
- EU institutions
- Receiving countries

**Tabel 3.6** indicates the stakeholder groups relevant to the Project identified to date.

**Table 3.6 Stakeholder groups relevant to the Project**

Stakeholder group	Connections to the Project
<b>Competent authorities</b>	Competent national authorities with permitting requirements that must be met by the Project
<b>Governments</b> <ul style="list-style-type: none"> <li>• National</li> <li>• Regional</li> </ul>	National, regional and local government individuals of primary political importance to the Project
<b>Parliaments/political parties</b> <ul style="list-style-type: none"> <li>• European Parliament</li> <li>• National</li> <li>• Regional</li> </ul>	National, regional and local individuals in respective parliaments and of primary political importance to the Project
<b>Non governmental organisations</b> <ul style="list-style-type: none"> <li>• International</li> <li>• National</li> <li>• Regional</li> </ul>	International, national and regional organisations with direct interest in the Project and that are able to influence the Project is implementation through public opinion.
<b>Private sector partners, organisations and contractors</b> <ul style="list-style-type: none"> <li>• Business and trade organisations</li> <li>• Fishery organisations</li> <li>• Financial community</li> <li>• Tourism organisations</li> <li>• Companies (suppliers, contractors, further energy companies, others)</li> </ul>	Individuals or organisations with a direct economic interest in the Project. This may be through gaining contracts with the Project or due to impacts caused by the Project.
<b>International donors and institutions</b> <ul style="list-style-type: none"> <li>• Multilateral and bilateral organisations</li> </ul>	Potential Project financiers with requirements for international best practice.
<b>Media</b> <ul style="list-style-type: none"> <li>• International</li> <li>• National</li> <li>• Regional</li> </ul>	International, national and regional media which are important for the wide-ranging dissemination of Project-related information.
<b>Relevant general public/communities</b>	Communities, households and individuals that will be affected by the Project.
<b>Other stakeholders</b> <ul style="list-style-type: none"> <li>• Third party advocates</li> <li>• Research and academic institutions</li> <li>• Professional associations</li> </ul>	Other international, regional and local groups with direct interest in the Project

Following the identification of stakeholder groups and connections, stakeholder details have been compiled. Stakeholder mapping has also been undertaken to identify the "interest" and "influence" of each stakeholder. This process is expected to be useful to:

- Identify potential issues posed by specific stakeholders
- Tailor the Project's Stakeholder Engagement Strategy to the interests and needs of different stakeholder groups
- Prioritise available Project resources

The stakeholder lists and maps are stored in a stakeholder database which is seen as a "living document" that will be updated as the Project develops.

## **Stage 2: Implementation of the Stakeholder Engagement Strategy**

The Stakeholder Engagement Strategy has been divided into four phases, each having slightly different objectives for consultation. The first three phases are determined by international law (Espoo Convention) and national legislations in the respective countries.

The four phases of the Stakeholder Engagement Strategy are:

### *Phase 1: Notification and scoping in accordance to the Espoo Convention (public consultation)*

The notification and scoping phase aims to introduce the Project and generate feedback on the scope, approach and important issues from key stakeholders. Consultation during this phase is mainly with the competent national authorities as well as national and regional government bodies. This phase is completed.

### *Phase 2: Environmental study (Baseline data collection and impact assessment)*

This phase aims to provide information on the Project and the basis for the environmental study. This phase includes obtaining all the relevant baseline information as well as the assessment of impacts. Consultations during this phase serve to broaden out stakeholder participation and to identify and measure key impacts of the Project. This phase is completed.

### *Phase 3: Disclosure and verification (public consultation)*

This phase aims to consult on the impacts and mitigation measures envisaged as part of the Project. Consultation will look to identify any issues that need to be resolved and ensure that measures to be implemented are appropriate. This phase will also reflect the Project's compliance with national regulatory requirements for the public disclosure of EIA findings as part of the Project's permitting process. All relevant stakeholder groups are expected to be consulted during this phase.

*Phase 4: Ongoing Engagement*

This phase is expected to be taken forward through the future phases of the Project. Stakeholder engagement is important to ensure a constructive relationship between the Project and its Stakeholders.

**Table 3.7** provides a detailed overview of how the interaction with identified stakeholders and target audiences has been planned.

**Table 3.7 Strategic Stakeholder Interaction**

<b>Disclosure Methods</b>	<b>Intended Audience</b>	<b>Phase of Consultation</b>	<b>Material</b>	<b>Evaluation of Effectiveness</b>
Submission and publication of Project Information Document (PID)	Competent authorities	Notification and scoping phase	Detailed description of the Project	<ul style="list-style-type: none"> <li>• Number of statements received</li> <li>• Number of downloads on website</li> </ul>
Introduction to the Project during scoping meetings	Competent authorities and stakeholders present at the meeting	Notification and scoping phase	PowerPoint presentation title "Secure gas supply for Europe – Nord Stream Project presentation"	<ul style="list-style-type: none"> <li>• Number of stakeholders well-informed about the Project</li> <li>• Discussions with feedback on key issues for future consultation</li> </ul>
Submission and publication of a Route Status Document	Competent authorities	Environmental study	Detailed description changes in the route following statements received in the Notification and scoping phase	<ul style="list-style-type: none"> <li>• Number of statements received</li> <li>• Number of downloads on website</li> </ul>
Submission and publication of a White Book of Comments	All stakeholders	Environmental study	Detailed document providing preliminary answers to statements received on Project Information Document (PID) and Route Status Document	<ul style="list-style-type: none"> <li>• Number of downloads on website</li> </ul>



Disclosure Methods	Intended Audience	Phase of Consultation	Material	Evaluation of Effectiveness
Introduction to the Espoo Report during public hearings	Competent authorities and stakeholders present at the meeting	EIA disclosure and verification phase	Power Point presentation title "Nord Stream's EIA studies"	<ul style="list-style-type: none"> <li>Number of stakeholders well-informed about the Project</li> <li>Discussions with feedback on key issues for future consultation</li> </ul>
Introduction to Espoo Report in launch events	Competent authorities and stakeholders present at the meeting	EIA disclosure and verification phase	<ul style="list-style-type: none"> <li>Explanation of the EIA process</li> <li>Espoo Report</li> <li>White Book of Comments</li> </ul>	<ul style="list-style-type: none"> <li>Number of stakeholders well-informed about the Project</li> <li>Discussions with feedback on key issues for future consultation</li> </ul>
Introduction to Espoo Report on web portal	All stakeholders	EIA disclosure and verification phase	<ul style="list-style-type: none"> <li>Explanation of the EIA process</li> <li>Espoo Report</li> <li>White Book of Comments</li> <li>National application materials</li> </ul>	<ul style="list-style-type: none"> <li>Number of visitors</li> <li>Number of page impressions</li> <li>Number of downloads</li> </ul>
Introduction to Espoo Report in a brochure	All stakeholders	EIA disclosure and verification phase	Brochure presenting key findings of the EIA process	<ul style="list-style-type: none"> <li>Number of downloads on website</li> <li>Number of brochures distributed</li> </ul>

Disclosure Methods	Intended Audience	Phase of Consultation	Material	Evaluation of Effectiveness
Introduction of a mobile exhibition	Relevant general public/communities	EIA disclosure and verification phase	Mobile exhibition called "Pipeline Information Tour" explaining aspects of the Project (natural gas, environmental studies, pipe-laying, the company)	<ul style="list-style-type: none"> <li>Number of visitors</li> </ul>
Publication of key messages in advertisements	Relevant general public/communities	EIA disclosure and verification phase	Placement of accompanying advertising motives on key Project issues (natural gas, environmental studies, corporate social responsibility)	<ul style="list-style-type: none"> <li>Number of readers per paper</li> </ul>
Regular Project presentations and participation in panel discussions at conferences, events	<ul style="list-style-type: none"> <li>Governments</li> <li>Parliaments/political parties</li> <li>Non governmental organisations</li> <li>Private sector partners</li> </ul>	All phases	PowerPoint presentation title "Secure gas supply for Europe – Nord Stream Project presentation" reflecting Project's development	<ul style="list-style-type: none"> <li>Number of stakeholders well-informed about the Project</li> <li>Discussions with feedback on key issues for future consultation</li> </ul>
Newsletter	All stakeholders	All phases	Regular (every 2 months) information on the Project's development	<ul style="list-style-type: none"> <li>Number of subscribers</li> </ul>

Disclosure Methods	Intended Audience	Phase of Consultation	Material	Evaluation of Effectiveness
Website	All stakeholders	All phases	<ul style="list-style-type: none"> <li>General background on the Project (environmental and technical aspects)</li> <li>Download of all available communications materials</li> <li>FAQ section including inquiry function</li> </ul>	<ul style="list-style-type: none"> <li>Number of visitors</li> <li>Number of page impressions</li> <li>Number of downloads</li> </ul>
Interactive micro-site	All stakeholders	All phases	Multimedia presentations explaining aspects of the Project (natural gas, environmental studies, pipe-laying, the company)	<ul style="list-style-type: none"> <li>Number of visitors</li> <li>Number of page impressions</li> <li>Number of downloads</li> </ul>
Publication of general background information	All stakeholders	All phases	<ul style="list-style-type: none"> <li>Background papers on Project aspects (natural gas and climate change, fishery, munitions, pipe-laying etc)</li> <li>Maps of the route</li> <li>Basic PowerPoint presentation</li> </ul>	<ul style="list-style-type: none"> <li>Number of downloads on website</li> <li>Number of subscribers</li> <li>Number of responses to direct mailing of materials</li> </ul>
Corporate publishing	All stakeholders	All phases	Brochure "10 Answers" presenting key facts of the Project	<ul style="list-style-type: none"> <li>Number of downloads on website</li> <li>Number of brochures distributed</li> </ul>

Disclosure Methods	Intended Audience	Phase of Consultation	Material	Evaluation of Effectiveness
Introduction to the Project and regular information on the development	Media	All phases	<ul style="list-style-type: none"> <li>• Press releases</li> <li>• Statements</li> <li>• Press briefings/conferences</li> <li>• Press trips</li> </ul>	<ul style="list-style-type: none"> <li>• Number of releases distributed</li> <li>• Number of articles published</li> <li>• Number of participants in briefings and trips</li> </ul>
Engagement in corporate social responsibility projects	All stakeholders	<ul style="list-style-type: none"> <li>• Environmental study phase</li> <li>• EIA disclosure and verification phase</li> <li>• Ongoing engagement</li> </ul>	Support of projects with an environmental and cultural focus	<ul style="list-style-type: none"> <li>• Number of visitors on respective project websites</li> <li>• Number of visitors at respective events</li> </ul>