



To the Points of Contact of the Espoo Convention in
the Russian Federation
Sweden
Denmark
Germany

Additional answer to the notification concerning the Environmental Impact Assessment in a Transboundary Context (Espoo Convention) for the Nord Stream Extension

In its letter of 14 June 2013 to the Russian Federation, Sweden, Denmark and Germany, Finland acknowledged the receipt of the notification letter on the Nord Stream Extension and indicated that it would participate in the environmental impact assessment (EIA) of the Nord Stream Extension. Finland also indicated that an additional answer would be sent to provide comments concerning the scope for the assessment of the environmental impacts of the project based on the Project Information Document (March 2013) prepared by the developer, Nord Stream AG.

As stated in the letter of 14 June 2013, altogether 35 statements and opinions were received concerning the environmental impact assessment programme. Summaries of these in English are found in addendum 1 of the statement by the Centre for Economic Development, Transport and the Environment for Uusimaa on the adequacy of the intended assessment in the Finnish Exclusive Economic Zone (EEZ). For this project, the Uusimaa Centre is the competent authority on the EIA. Copies of the original opinions in Finnish with English summary are available online, as are the summaries of the statements and opinions that have been translated into English. These documents can be found on the web pages of the Uusimaa Centre (www.ymparisto.fi/uus > Ympäristövaikutusten arviointi YVA ja SOVA > Vireillä olevat hankkeet). The developer will receive copies of the opinions as part of the Finnish environmental impact assessment procedure.

According to Finland's Act on Environmental Impact Assessment Procedure (EIA Act), the Ministry of the Environment is the competent authority for the Espoo Convention and, therefore, is in the position to coordinate Finland's reply to the notification. In this additional answer to the notification, Finland would like to address such issues that were raised in the statements and opinions received nationally and that are intended for consideration in the EIA by all Parties of Origin and Russia.

The construction of the extension of the offshore gas pipeline from the Russian Federation to Germany is an extensive project, which will have an impact over a wide area in the Baltic Sea. The assessment of the environmental impacts on the state of the Baltic Sea needs to be carried out carefully and thoroughly, because the Baltic Sea is a particularly sensitive ecosystem that already has an excessive pollution load. Any solution needs to be applied in such a way that it will not change water conditions or cause considerable and long-term harm to the marine ecosystem of the Baltic Sea.

The scope of the EIA of the Nord Stream Extension is comprehensive and it has made use of the experiences and knowledge acquired during the planning, construction and monitoring of the Nord

Stream pipelines 1 and 2. Based on monitoring information from the existing pipelines, it can be indicated that the transboundary environmental impacts caused by the pipelines have been minor.

The pipe routes of the Nord Stream Extension, however, differ from the routes of the existing pipelines and, thus, these could cause transboundary impacts. Finland considers it important to protect the values of marine biodiversity in the Baltic Sea. Endangered species and habitats, as well as protected areas and other areas of high biodiversity values should not be negatively affected throughout the NS pipeline extension. One alternative route passes through the Kurgalski Peninsula, which is recognized as an area rich in diversity. Baltic ringed seals and grey seals and arctic migratory birds use this area either for breeding and/or as a resting area. It also forms the most important shore and land area in the Gulf of Finland for the Baltic ringed seal population of Russia, Estonia and Finland. This and other areas of high biodiversity values along the routes of the pipelines needs to be given special focus in the EIA. In addition, noise disturbance, especially that caused by the compressor station and gas flow, which is strongest at the beginning of the sea section of the pipeline, needs to be taken into account in the EIA.

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Addendum

Statement to Nord Stream by the Centre for Economic Development, Transport and the Environment for Uusimaa

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