



Environmental Protection Agency
Ministry of the Environment and Food of Denmark
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Consultation in accordance with Articles 4 and 5 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) for the Nord Stream 2 gas pipeline

A notification in accordance with the Espoo Convention concerning the Nord Stream 2 gas pipeline project was given on 8 April 2013. In Finland's answer to this notification an indication of willingness to participate in the EIA procedures of Denmark, Germany, Sweden and the Russian Federation was presented (letter dated 14 June 2013).

Denmark, acting as the Party of Origin, submitted to Finland on 20 June 2017 the EIA Documentation of the Nord Stream 2 project, "Espoo Report and Espoo Atlas". The EIA documentation was the same documentation which was submitted by the other Parties of Origin in April 2017 and had been on public display and authorities and the public were given the opportunity to provide comments on the material. The Ministry of Environment organized supplementary public display of the EIA documentation and asked comments from various authorities and organizations on the material from 11 July to 11 September 2017. No further substantial comments were received. Finland responded to Denmark on 20 September 2017 and requested Denmark to take into consideration in the ongoing EIA and in the permitting of the project the statements and comments expressed in Finland's answer to Germany, Sweden and the Russian Federation on 30 June 2017.

In 9 October 2018, Denmark announced that the developer, Nord Stream 2 AG, has submitted an application and the relevant EIA documentation for a new north-western route crossing the Danish exclusive economic zone (EEZ), and submitted to Finland the EIA Documentation and other material of the north-western route alternative. The Ministry of Environment organized public display of the EIA documentation and other material received. Authorities and the public were given the opportunity to provide comments on the material from 19 October to 14 December 2018. The Ministry also requested comments from 58 authorities and organizations on the material. The Ministry received ten responses of which seven did not see a need to comment on the matter. Three of the responses included actual substantial comments on the project. Finland responded to Denmark on 19 December 2018.

On 8 May 2019, Finland received a letter from Denmark concerning a new south-eastern route alternative. In the letter Denmark announced that in March 2019, the Danish Energy Agency had requested Nord Stream 2 AG to investigate a south-eastern route on the continental shelf. In April 2019 the developer (Nord Stream 2 AG) had submitted an application and the relevant EIA documentation for a south-eastern route crossing the Danish EEZ. With a letter received on 8 May 2019 Denmark submitted to Finland the EIA Documentation and other relevant material of the new route alternative.

The Ministry of Environment organized public display of the EIA documentation and other material received. Authorities and the public were given the opportunity to provide comments on the material from 14 May to 28 June 2019. The Ministry also requested comments from 57 authorities and

organizations on the material. The Ministry received ten responses of which five did not find anything to comment on the matter. A summary of the comments received are presented here.

Ministry of Agriculture and Forestry. The Ministry of Agriculture and Forestry states that all its previous statements regarding the issue should be taken into account. In its previous statement the Ministry stated that particularly the transboundary impacts during construction phase and operation phase on fish, fishery and marine mammals have to be considered.

Finnish Transport Infrastructure Agency. The Finnish Transport Infrastructure Agency refers to its previous statement concerning the north-western route alternative. The agency noted that the installation of the natural gas pipeline may cause minor harm to the flow, safety and security of Finland's foreign maritime traffic. This is why the party implementing the project must notify the Danish maritime authority of the implementation of the project in a way stated by this authority in order that the Finnish maritime traffic authorities and operators are aware of any changes to the shipping routes caused by the project well in time before the launch of the project.

Finnish Meteorological Institute. According to the Finnish Meteorological Institute, the construction of the natural gas pipeline will have an effect on the physical conditions of the sea, such as currents, temperature and salinity in the immediate vicinity of the pipe. The project is not expected to have any effect on the marine conditions in Finland's exclusive economic zone.

Geological Survey of Finland. The Geological Survey of Finland considers that the project does not cause negative transboundary impacts on the abiotic marine environment in Finland.

Finnish Association of Professional Fishermen (Suomen Ammattikalastajaliitto ry, Finlands Yrkesfiskarförbund rf). The issuer of the statement wishes to draw attention to the fact that route V1 of the NSP 2 runs through a dumping area for explosives and for chemicals and substances used in warfare. This will weaken the ability to rehabilitate the area at a later date. Furthermore, the route in question is not favourable from the perspective of transboundary impacts. Assessments of the project must take into account the Baltic Sea Strategy and possibility of repairing the state of the Baltic Sea.

If route V1 is the alternative selected, however, the pipeline area must be cleared of explosives and of chemical material used for warfare. In addition, the pair of pipes must be surrounded by a cleaned area that is of sufficient width, approximately 500 metres on each side of the pipeline. A review should be conducted to determine the width needed. The precise location of the explosives and other material is not known, as no precise map image was prepared during the hurried dumping phase, and the material, which was packed primarily in wooden boxes, was able to spread to a wider area than intended. These factors must be taken into account in the route selection and in the plans for cleaning and clearing the area. It is also important to become familiarised with all of the existing data on the matter.

As a further observation, the issuer of the statement draws attention to the fact that once the lifespan of the pipeline has ended, it should be removed. It must also be considered whether there is a polluter-pays principle in the environmental legislation that can be used or applied at the national level and that would bring new aspects to the disposal of these explosives and chemical materials.

The issuer of the statement requests the opportunity to elaborate on its statement at a later date. The issuer of the statement does not request compensation from Nord Stream AG for the actions in question; instead, it wishes with its comments to draw attention to the wellbeing of the marine environment.

The Ministry of Economic Affairs and Employment, the Ministry of Social Affairs and Health, Finnish Safety and Chemicals Agency (Tukes), Natural Resources Institute Finland (Luke) and the Regional Council of Southwest Finland did not see a need to comment on the matter.

The Ministry of the Environment wishes to bring comments received to the attention of Denmark to take into consideration in the ongoing EIA procedure and in the permitting of the project (enclosed).

In addition, the Ministry of the Environment requests Denmark to take into consideration the statements and comments expressed in Finland's answer to Germany, Sweden and the Russian Federation on 30 June 2017 (enclosed).

Yours sincerely,

Permanent Secretary



Hannele Pokka

Ministerial Adviser



Lasse Tallskog

Enclosures

Responses with substantial comments

Finland's answer to Germany, Sweden and the Russian Federation on 30 June 2017 and the enclosure (Comments given on the transboundary impacts).