



8 September 2010

Danish Ministry of the Environment, Denmark

Ministry of Transport, Denmark

Landesbetrieb Straßenbau und Verkehr Schleswig-Holstein, Germany

**Answer to the notification in accordance with Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) for the fixed link across the Fehmarn Belt**

Finland has received notification from Denmark and Germany concerning the environmental impact assessment (EIA) of the fixed link across the Fehmarn Belt. The notification was made in accordance with Article 3 of the Espoo Convention. Included with the notification was e.g. the EIA scoping report – the proposal, in English, for an environmental assessment of the fixed link across the Fehmarn Belt and a summary report in Finnish and Swedish.

The fixed link across the Fehmarn Belt is planned to be constructed between Puttgarden in Germany and Rødbyhavn in Denmark, the distance being 19 km. The plan is to build a combined rail and road link consisting of an electrified, double-track railway and four-lane road with the technical quality of a motorway. Options are a bridge or an underwater tunnel.

During the public comment period from 9 July to 23 August 2010, there was an opportunity for the public and the authorities to comment on the material. The material was displayed in Åland, in the Ministry of the Environment in Helsinki and on the Internet.

Twelve answers were received in Finland from authorities, research institutes and an NGO. A summary of the statements are presented.

*Ministry of Agriculture and Forestry.* Depending on the alternative, the construction work will require extensive dredging. That may have impacts on the marine environment and on the state of the Baltic Sea, which also concerns Finland. Participation in the EIA should be considered.

*Ministry of Employment and the Economy* considers it necessary to participate in the EIA. The Ministry will give a statement on the EIA documentation.

*Ministry of Internal Affairs* has nothing to say about Finland's participation in the EIA.

*Ministry of Defence* has no comments on the EIA scoping document. According to the viewpoint of its administrative sector, it does not see a reason to participate.

*Åland Government* wishes to receive information on the project if Finland will participate.

*Centre for Economic Development, Transport and the Environment in Uusimaa.* The project area is situated in an area that serves as a route for migratory birds heading north; bridge construction could have impacts on bird migration. A bridge could restrict shipping, although the vertical clearance is the same as

for the Great Belt Bridge. The bridge alternative may have adverse transboundary impacts on Finland. But, the scoping document is focused narrowly only on impacts in Germany and Denmark. The assessment of potential transboundary impacts must be secured in the EIA.

*Centre for Economic Development, Transport and the Environment in Varsinais-Suomi* states that the project most likely will have impacts on the state of the Baltic Sea. Indirect impacts through sea currents may reach Finland. Modelling of these currents and of ecological interdependency will clarify the extent of these impacts. However, it is unlikely that significant transboundary impacts will occur in Finland because of the remoteness of the project. Information on the impacts of the activity on the state of the Baltic Sea could be a reason to participate in the EIA.

*Finnish Environment Institute (SYKE)*. In regard to environmental protection, it is important that the project does not change the water conditions in the Baltic Sea. The starting point must be an alternative that does not change the natural sea current conditions. Such changes could impact the whole Baltic Sea ecology. It is important that Finland participates in the EIA. Participation will allow Finland to follow the process and influence decisions. SYKE wishes that an international panel would be organised that will help secure the scientific credibility and bring forward different viewpoints.

*Finnish Meteorological Institute*. From Finland's point of view the following questions, which fall under the competence of the Institute, may arise: A) what are the impacts of the bridge alternative on water exchange and salinity of the Baltic Sea; B) what are the impacts of the bridge alternative on the maximum size of ships and other maritime traffic constructions, taking into account seasonal changes in water depth when the shipping route is open; C) what are the restrictions of the tunnel alternative on future dredging of the shipping lane, this could influence the maximum size of ships that could be built by the Finnish shipbuilding industry; D) what are the impacts of the structures of a fixed link on sea current conditions, e.g. on the stability and movement of sediment in the shipping lane and on changes in the maritime risk, depending on the currents during the construction phase and during use of the fixed link. The Institute trusts that the developer will take the above-mentioned impacts into account, but Finland's participation in the EIA can be expected to minimize the probability of negative impacts.

*Finnish Transport Agency*. The planned vertical clearance is the same as for the Great Belt Bridge, which means that the planned bridge would not cause new restrictions on maximum height of ships. It also will not decrease significantly the water area used for shipping and most likely will not put maritime safety at risk. The EIA scoping document perceives adequately the impact assessment on maritime safety. The Agency does not see any reason for participating in the EIA from the viewpoint of its administrative sector.

*Geological Survey of Finland*. The agency does not feel that Finland needs to participate in the EIA, as the project will not cause such significant impacts on the sea bottom and sedimentation in Finland.

*Finnish Association for Nature Conservation*. The statement was given by the Uusimaa district office of the Association, and it is based on the EIA scoping document and on information given at the Danish public hearing on 18 August 2010. According to the Association, it is important that Finland participates in the EIA. The following issues should be studied in more depth in the EIA because the current viewpoint is too local. A) The salt water inflow to the Baltic Sea cannot be blocked or weakened: there must be studies to see how the structures and tunnel, which would be constructed on the bottom, will change the water currents and affect the saline pulses. B) What are the impacts of construction and sand extraction? These activities can affect anything from underwater biotypes to migratory birds. C) What are the impacts on bats migrating to Finland? D) Maritime safety and potential accidents must be taken into account. E) The scoping document does not present clear methods for evaluating the impacts on the scale of the whole Baltic Sea. The EIA is intended to be very local, which is not considered sufficient.

The Association presents comments on the scoping document: two years is too short of a time to produce statistically valid results (e.g. migrating bats); a tunnel that would be constructed under the sea bottom could be another alternative; one alternative should be a railroad connection that could have railway carriages for transporting cars; international commitments on biodiversity and water quality

should be taken into consideration when setting the goals for the state of the environment – the present situation cannot be the aim; underwater sand dunes providing important areas for spawning and fry production have not been mentioned, only those areas important to eel have been referred to; sedimentation and its impacts must be taken into consideration; the international recommendations that are followed should be listed more specifically; modelling is done for 30 years in many cases, but the estimated life of the fixed link is 120 years; impacts of the project on climate change must be studied better and with application of the precautionary principle. At the public meeting, the picture given of the state of the Baltic Sea and its future, as compared to current research results, was too optimistic.

On the basis of the comments received, and reflecting its own views, the Ministry of the Environment would like to state that Finland will participate in the EIA of Denmark and Germany with regard to the Fehmarn Belt fixed link project. The above-mentioned comments should be taken into account in the EIA to a sufficient scale. Especially, it is important to assess the impacts of the fixed link on the water exchange and salinity of the Baltic Sea, on possible cumulative impacts of the Great Belt Bridge and the planned fixed link, and the possibility of significant adverse transboundary impacts on Finland.

Permanent Secretary

Hannele Pokka

Counsellor,  
Environmental Impact Assessment

Seija Rantakallio

Enclosures to Danish Ministry of the Environment and Landesbetrieb Straßenbau und Verkehr Schleswig-Holstein: Statements and opinions given in Finland (In Finnish and one in Swedish)

Sent to:

Danish Ministry of the Environment  
Att. Laila Wieth-Knudsen  
Agency for Spatial and Environmental Planning  
Haraldsgade 53  
DK-2100 Copenhagen  
Denmark

Ministry of Transport  
Att. Natasha Kroager Carlsson  
Fredriksholms Kanal 27 F  
DK -1220 Copenhagen  
Denmark

Landesbetrieb Straßenbau und Verkehr Schleswig-Holstein  
z.H. Frau Gerhardt  
Mercatorstraße 7-9  
D-24106 Kiel  
Germany

For information in an electronic form

Federal Ministry for Environment, Germany (Matthias.Sauer@bmu.bund.de)