



Enocksson, Egon
Phone: +46-10-698 11 91
Egon.enocksson
@swedishepa.se

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Point of contact in;
Denmark
Finland
Germany
Russian Federation

Comments from Sweden concerning the notification for the Nord Stream Extension

Sweden has received notifications from Germany, Denmark, Finland and Russian Federation and gives the following respons:

- Sweden expresses its wish to participate in the joint EIA-procedure.
- Sweden sends all comments received from national and regional authorities and municipalities with a brief summary of these comments.

The Swedish Environmental Protection Agency (SEPA) has the responsibility to fulfil the obligations under the Espoo-convention in sending and receiving notifications. The Agency has however no responsibility to evaluate the received comments from the national referral procedure in order to provide a unified standpoint for Sweden. For activities within the Swedish exclusive economic zone (EEZ) there is no authority responsible for a decision on the scope of the EIA at this stage of the procedure. The responsibility to perform the consultations and to prepare the EIA for the applications lies with the developer. The consultation performed by Nord Stream AG in Sweden has lasted from 8 April until 5 June.

The consultation that SEPA has performed under the Espoo-consultation has been accomplished as follows:

The notifications together with the Project Information Document have been circulated for consideration to Swedish central and regional authorities and organizations. The consultation period lasted from 12 April until 31 May 2013. A press release was made and the documents have been available for the public at the library at SEPA and at the County Administrative Board in Visby, Gotland. All documents have also been available on the website of SEPA:

<http://www.naturvardsverket.se/Stod-i-miljoarbetet/Rattsinformation/Remisser/Aktuella-remisser/Planer-i-vara-grannlander---Esbokonventionen/Nord-Stream-/>

Information meetings were arranged by Nord Stream AG in Visby 20 of May 2013. At the meeting Nord Stream AG gave information on the project and on the developer's consultations in Sweden according to the Swedish legislation.

SEPA has received 15 comments as a result of the Espoo-consultation such as: 9 Government Agencies, 4 County Administrative Boards, Region Gotland (The Municipality of Gotland) and the municipality of Karlskrona. The comments are summarised briefly below. The comments in full text - in Swedish and translated into English - are enclosed in a USB memory stick.

Comments in brief

Most of the viewpoints submitted concern the scope of the upcoming environmental impact assessment (EIA). Few of the comments have a direct bearing on how the project in adjoining countries could affect environmental conditions in Sweden.

A few of these comments address possible environmental impacts for a specific country or specific area outside Sweden's EEZ.

Several of the responses refer to previous responses that were given as well to the fact that the agencies were given an opportunity to submit viewpoints on the preliminary project information (PID) (21 February to 5 March 2013) as comments on the investigation permit regarding investigation of the Swedish shelf in the Baltic Sea and comments in relation to the previous Nord Stream project.

The Swedish Agency for Marine and Water Management have determined, based on the control programme carried out, that the likelihood of transboundary environmental impact is small. Potential transboundary environmental impact could arise if valuable habitat in other parts of the Baltic Sea is disrupted or seriously damaged. Therefore, it is especially important that extension alternatives at the land connection areas be investigated.

Protected areas should be disclosed and alternatives to extensions close to or adjacent to the protected areas should be selected first of all.

Further, mention is made of how the impact on flora and fauna can be minimised and that certain disruptive activities should be avoided altogether during sensitive time periods.

Transboundary effects can also arise through pollutants that can be released by accident or because of work on seabeds with polluted sediment.

The link with other infrastructure projects in the Baltic Sea and possible obstacles for future projects should be described.

Schedules for the planned pipe-laying project should be disclosed in relation to existing fishing regulations designed to protect the fish population.

The Swedish Agency for Marine and Water Management also have brought up the project's impact on achieving established environmental quality standards and requested explanation of what compensation might be available in respective countries if necessary.

The National Board of Housing, Building and Planning asserts that environmental impacts for such a large project should be studied collectively for the whole project and that the environmental impact assessment should address economic issues and structural energy supply issues as well as alternatives. There is a need for a strategic comprehensive approach. It would be desirable if the country's agencies directly responsible for planning could address and discuss these issues and how suitable alternatives can be presented.

The Swedish National Heritage Board refers to previously submitted viewpoints on the preliminary PID. They note the need for differentiating in the description between shipwrecks and settlements, especially in view of the fact that the investigative techniques for these ancient remains differ.

The National Maritime Museums advocate describing cultural environments in a satisfactory way in the data underlying the consultation.

The Geological Survey of Sweden (SGU) describes the seabed geology conditions in the border area between the Swedish and Finnish and the Swedish and Danish EEZ respectively and what these seabed conditions can mean in connection with the project, particularly with respect to the dynamic processes of sediment deposition.

The Swedish Maritime Administration submits primarily general viewpoints regarding shipping and maritime safety both in the Swedish EEZ and in the rest of the Baltic Sea and, like **the Swedish Coast Guard**, calls attention to the need to keep relevant authorities informed of the project's implementation. The Swedish Maritime Administration also refers to previous comments.

The Swedish Defence Research Agency brings up the need for natural gas in Europe in the long term, makes reference to the EU climate goal and requests a more developed zero alternative, among other things.

The Swedish Meteorological and Hydrological Institute (SMHI) has nothing to add to the case.

The Stockholm County Administrative Board points out that the current extension risks winding up in the vicinity of the Bornholm Deep, which is the only functioning spawning area for the eastern population of Baltic cod. The environmental impact assessment should address how Nord Stream will ensure that this area will not be damaged by the new dredging.

The Gotland County Administrative Board believes that the transboundary effects of the expansion project probably are small compared with the impact on the respective countries' EEZ. The consequences that could arise are primarily disruptions in the bird areas and fish spawning areas as well as indirect effects such as impeding shipping and fishing.

The Blekinge County Administrative Board maintains that an expansion of the gas pipeline can curb development of renewable energy and that the zero alternative also will have an impact on the environment, and therefore the zero alternative should be described in more detail. Against that background, the County Administrative Board believes that the project's climate impact should be described more thoroughly.

The County Administrative Board believes that there should be a description of which sections need to be ditched and lined with stone, and for these sections a description is needed of the types of environments that will be affected as well as the environmental impact this entails.

The County Administrative Board believes that dynamically positioned pipe laying vessels should be used as much as possible to minimise impact on the seabed.

Alternatives for additives used in cleaning and pressure-testing should be disclosed.

The effects of laying and operating the gas pipeline in overwintering areas for birds, such as the long-tailed duck, should be described.

There should be some form of economic security before work begins to cover the cost of taking up and taking care of the pipeline and restoration work on the seabed.

The Kalmar County Administrative Board refers to corresponding comments on a proposal submitted for the earlier gas pipeline project (2007-01-24). Those comments note the need to show alternative pipeline extensions, as well as to describe important bird and fishing areas, the consequences for commercial fishing, the effects on important bird areas, the consequences for ship traffic, description of chemicals used, disclosure of how any dumped ammunition and chemical weapons will be handled, organisation to deal with accidents and handling of ancient marine cultural remnants.

Karlskrona municipality states that it is important for the environmental impact assessment to address the consequences of ancillary activities that are necessary for carrying out the project and that could affect the municipality as well as to disclose the risks of consequences due to accidents resulting from the construction and operation of the pipelines.

For the Swedish Environmental Protection Agency

Torunn Hofset
Acting Head of Section

Egon Enocksson
Point of Contact for the Espoo Convention

Send List

DENMARK

Ms. Laila WIETH-KNUDSEN

E-mail: lwk@nst.dk

Ms. Christina BERGENDORFF

E-mail: cberg@nst.dk

FINLAND

Ms. Saara BÄCK

E-mail: saara.back@ymparisto.fi

GERMANY

Mr. Christof SANGENSTEDT

E-mail: christof.sangenstedt@bmu.bund.de

RUSSIAN FEDERATION

Mr. Vladimir IVLEV

E-mail: ivlev@mnr.gov.ru

Mr. Akhmed MUSAEV

E-mail: amusaev@mnr.gov.ru

Copy:

The Swedish Government

Nord Stream AG

Points of Contact for the Espoo-convention in:

ESTONIA

Mr. Ado LÕHMUS

E-mail: ado.lohmus@envir.ee

LATVIA

Ms. Sandija BALKKA

E-mail: sandija.balka@vidm.gov.lv

LITHUANIA

Mr. Vitalijus AUGLYS

E-mail: v.auglys@am.lt

POLAND

Ms. Katarzyna TWARDOWSKA

E-mail: katarzyna.twardowska@gdos.gov.pl

Ms. Paulina FILIPIAK

E-mail: paulina.filipiak@gdos.gov.pl

Enclosures

Statements received are enclosed in a USB memory stick, in Swedish and translated into English.