

Uppsala/Stralsund, 21.07.2017

Statement at the public hearings on the Nord Stream II Project

21.07.2017, Stralsund, Germany

On behalf of the Coalition Clean Baltic, an NGO network of 19 grass-root environmental NGOs around the Baltic Sea, including BUND – Friends of the Earth Germany, altogether representing over 850 thousand Baltic catchment residents, I would like to give couple of reflections on the proposed Nord Stream 2 Project EIA in transboundary context. As we represent environmentally-concerned citizens of both Parties of origin and affected parties of the proposed project, CCB is honoured to represent their voice.

As stated in the Guidance on the practical application of the Espoo Convention, in most cases the Convention is applied between neighbouring Parties. However it is also noted that the Convention does not only apply to transboundary impacts between neighbouring Parties but also to long range transboundary impacts. Activities that can make long-range impacts in transboundary context include activities with air pollutants or water pollutants, activities potentially affecting migrating species and activities with linkages to climate change.

And in this case it applies equally to all Parties of Origin, be it not only Russia and Germany, but also Finland Sweden and Denmark. As the **primary cause of the impact** is not a construction and maintenance, but the very fact of **laying the pipeline across the Baltic Sea**.

Saying that we would like to raise the attention to couple of such transboundary impacts and draw the attention of Germany as one of the Parties of origin on the need to address those impacts.

Not to dwell in detail on the climate change related impacts, we would like to reflect that a common position of Baltic environmental NGOs is that **NS2 Project is in direct contradiction with EU Paris COP goals of reducing greenhouse gas emissions by 80-95% by 2050**, by replacing fossil fuels with renewable energy sources. And we have already notified the European Commission of this fact.

However, we would like to touch upon critical nature values of the Baltic-wide importance that are threatened by the proposed project.

First, about migratory, vulnerable and endangered species.

One of the reasons for designating new Marine Protected Area in the Swedish EEZ, south of Gotland, was that the **protection status of the Baltic harbour porpoise** was determined as **unacceptably poor**. It was pointed to Sweden by the EC in the assessment of implementation of the Habitat's Directive. It was also backed by the new knowledge that became available quite recently through the SAMBAH Project, providing a reliable and scientifically confident estimate that number of those small whales in the Baltic Sea is not more than 500 and each year we lose some of them due to human-induced mortality, e.g. fisheries. At this level the population of harbour porpoise is so critical that losing even single animal that could breed and bring offspring is a huge loss. Therefore, the Swedish Government has put in place a protected area at Mid-Sea banks and develops a management plan to limit various human

Coalition Clean Baltic is a network of environmental NGOs sponsored by:

• Ecohome, Belarus • IPO Ecopartnership, Belarus • Danish Society for Nature Conservation • Estonian Green Movement • Finnish Association for Nature Conservation • Finnish Society for Nature & Environment • Bund für Umwelt und Naturschutz Deutschland, BUND • Environmental Protection Club of Latvia, VAK • Latvian Green Movement • Lithuanian Green Movement • Lithuanian Fund for Nature • Polish Ecological Club, PKE • Green Federation - GAJA, Szczecin, Poland • Friends of the Baltic, St Petersburg, Russia • Green World, St.Peterburg, Russia • Swedish Society for Nature Conservation • WWF Sweden • The Western Center of the Ukrainian Branch of the World Laboratory

activities within its boundaries, including fisheries, shipping, deep sea mining or laying infrastructure. In that sense, adding yet another disturbing factor in the area that is crucial for mating, breeding and nursing of the harbour porpoise throughout almost the whole year is certainly a significant negative impact that has to be minimised, if not prevented. With this respect we are **seriously concerned with the NS2 estimation of level of underwater noise produced and respective impacts it may cause** while trenching and pipe-laying during the proposed project. With the knowledge we have, backed by science including HELCOM experts on underwater noise, **we firmly require that should the project be permitted to commence, trenching and pipe-laying should be limited to the period from December to March.** This consolidated NGOs position was also reflected at the public hearings in Sweden, where an option of shifting the route off the limits of the protected area was already lifted up.

The same goes without saying with regards to endangered ringed seal population in the Gulf of Finland that is already quite affected by similar human factors as harbour porpoise, and in addition – by climate change. **The ammunition clearance and actual pipe-laying process in the vicinity of ringed seal haulouts and reproduction areas is a significant impact** that cannot be neglected. So far, neither the ammunition issue nor the proposed routing of the pipeline have been adequately responding to the associated environmental risks to ringed seals. This also became obvious and was highlighted at the public hearings in Estonia and Finland.

Secondly, about critical habitats of international importance

The proposed route that has been presented by the Nord Stream 2 AG as a part of Espoo EIA international consultations documentation is also a significant concern in terms of other common Baltic nature values. We would particularly like to point here to the landfall part in Russia, in the Gulf of Finland. The route proposed by the company as the best from environmental point of view and hence included in the Espoo documents as the only suitable alternative is simply not based on the law. It suggests to cross Kurgalskiy Peninsula, the nature protected area of dual international importance that is designated as a wetland of international importance under Ramsar Convention and a Baltic MPA under Helsinki Convention. Irrespective that none of the Conventions prohibits such human activities to be performed in those areas, any changes to the protection status should be duly justified, while simple commercial interest of saving money for a shorter route could not be considered enough justification. Moreover, **current legal status of this protected area in Russia simply prohibits any construction works within its limits**, not even saying about wiping out massive land area with up to 80 m wide trench. Really worrisome is the fact that according to our knowledge the efforts are undertaken to change the limits of the protected area to allow such activities to be carried out.

To make you a snapshot of the prospected impact, if such a development would be allowed, we would like to mention that the proposed landfall area in Russia is well known in the eastern part of the Gulf of Finland as the richest in terms of biodiversity with over 100 species of fauna and flora being redlisted as regional, national and Baltic-wide endangered and rare species. Habitats are represented by a mixture of pristine old-growth forests, bogs and dunes. In addition, it is an area that has been traditionally populated by indigenous Finno-Ugric people, being very much connected to nature and its values. Nature is a part of their traditional way of living, they are dependent on careful harvesting of nature resources. So, severe **interference and impact that the NS2 Project would bring to the area is simply incomprehensible. It will be a devastating loss to natural, cultural, historic and social values that can hardly be avoided, minimised or compensated.** It was pointed out in numerous inputs at the recent public hearings in Russia.

By the way the Russian national EIA process should be formally launched today, where we expect yet another round of discussions with the developer of the project. In that sense, the international attention to the issues we raised is highly relevant for the outcome of this whole process.

We believe that all **Parties of Origin should realise the level of impacts that** are not limited to adjacent areas only, but **are of Baltic-wide importance**, and that **they bear full responsibility for those impacts** by permitting the project in the way it is proposed now.