The Swedish Society for Nature Conservation (SSNC) comments on the international consultations on the Nord Stream II Project

Summery

The Swedish Society for Nature Conservation (SSNC) welcomes the opportunity to provide comments on the international consultations regarding the Nord Stream II Project through the Esbo-convention. The SSNC has mainly three areas of concern. The first area of concern is the reason for the pipeline. A new fossil fuel project for energy supply is not the right way forward for Europe or the world. Rather, countries should prioritize investments in renewable energy and limit further investments in fossil fuel projects and infrastructure. Our second concern is related to the planned route of the pipeline through the Kurgalskiy Nature Reserve in Leningrad Oblast. The planned route would be the worst possible route for the area and needs to be moved. The third area of concern is about the possible negative impact pipe-laying and trenching of the pipeline may have on the critically endangered and highly vulnerable harbor porpoise population. The SSNC strongly recommends that mitigation measures to reduce noise are used throughout the whole process and that no activities close to the newly designated marine protected area are allowed during May-December in order to respect the sensitive period of mating, breeding and nursing periods of the species.

Background

The Nord Stream 2 Project comprises the planning, construction and operation of a new twin subsea pipeline that would connect European consumers with Russian gas fields. The Project will have the capacity to supply 55 billion m3 of natural gas per year. The Pipeline has a planned length of approximately 1200 km from Russia to Germany via the Exclusive Economic Zone and/or Territorial Waters of Russia, Finland, Sweden, Denmark and Germany in the Baltic Sea. The design, construction, and subsequent operation of the pipeline will be managed by Nord Stream 2 AG, which has been specifically established for this purpose.

Investment in natural gas

SSNC doesn’t think that a new fossil fuel project for energy supply is the right way forward for Europe or the world. Rather countries should prioritize investments in renewable energy and limit further investments in fossil fuel projects and infrastructure. This is important in order to reach
the goal of reducing greenhouse gas emissions by 80-95% when compared to 1990 levels by 2050 as set by the EU. In addition, turning from fossil fuels to renewables is required to honor the commitments outlined in the Paris Agreement.

**Kurgalskiy Nature Reserve**

Since early 2000s, when the new port of Ust-Luga has emerged, the Kurgalskiy Nature Reserve in Leningrad Oblast has been under constant anthropogenic pressure. This has added further to such stress factors such as uncontrolled tourism, poaching and poorly managed fisheries. And now, another threat to the area has arisen. After the official launch of the International Consultations on Environmental Impact Assessment in a Transboundary Context under the terms of the Espoo Convention, it became evident that Nord Stream II AG among three alternative routes has chosen the route most harmful to the environment. A route that will tear apart Kurgalskiy MPA. This is a protected area of dual international importance —under HELCOM as well as under the Ramsar Conventions. The gas pipeline construction will lead to the destruction of the unique natural complexes including places of habitat of a big number of rare and endangered species of animals and plants. Ornithologists who worked for the Nord Stream-2 AG have published information about nesting of white-tailed sea eagle (Haliaeetus albicilla) in the south part of the Kurgalsky reserve. According to the NSP2 Espoo Report the pipeline construction corridor (approximately 85 m wide and approximately 3.8 km in length) will pass across the southern part of Kurgalsky Nature Reserve and will inevitably destroy the habitat of that and the other rare species. Another part of the Kurgalsky reserve that might be destroyed by the pipeline construction is the primary forest. According to the NSP2 Espoo Report (p. 393) for primary forest and relict dune habitat within the 85 m wide working area, re-establishment of the original habitats may take long (potentially decades) due to the damage to soils, changes in the groundwater regime, mycorrhizae content and existing vegetation, and there is less certainty that original habitats will re-establish at all. In addition to the very long-term and uncertain recovery of these sensitive habitats, there will also be a small permanent loss of forest cover as re-growth of deep rooted trees will be prevented within 7.5 m above each pipeline and within 6 m of access road.

Drawing the natural gas pipe right through this area is not acceptable to SSNC or its partner organization in the Coalition Clean Baltic and therefore, we would like to highlight several points for consideration:

1. In accordance with Russian legislation, any construction of pipelines within the Kurgalskiy nature reserve area is prohibited. To change the statute and boundaries for the reserve, which is now happening at the same time as active development of the Nord Stream II Project occur, is certainly not honoring the ideas of protected areas.

2. Considering the biological value manifested by its legal protection of the area, we inquire what grounds the route across Kurgalskiy Peninsula and MPA could be claimed optimal from environmental, economic and social perspectives. Overwhelming research findings confirm the significance of the selected area from a Baltic-wide nature conservation point of view. Numerous protected and red-listed species of flora and fauna are observed in the area. In spite of that, marking of the pipeline route on spot has commenced even before finalization of EIA process and obtaining permits.
3. The so-called Ingermanlandsky Marine Reserve that was supposed to be established as a compensation measure for the Nord Stream I pipeline has never been realized.

**Harbour porpoises**

In December 2016, new marine protected areas were notified by the Swedish Government to the European Commission for the protection of harbour porpoise (*Phocoena phocoena*). The largest area is situated on and around the offshore banks in the Baltic Proper, very close to the proposed route of the pipeline. This area is recognized as the main breeding area for the Baltic Proper harbour porpoise population, and holds the main part of the population during the breeding season in summer. Water notice of the kind that will be produced during pipe-laying and trenching of the Nord Stream II pipeline can have a very negative impact on harbor porpoise. It is hence crucial that such sound pollution is minimized during the whole process, i.e. through bubble curtains. The SSNC also strongly recommends that no activities close to the designated protected area should be allowed during May-December because of mating, breeding and nursing periods of this critically endangered and highly vulnerable population.

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Swedish Society for Nature Conservation

John Sandahl
Chair

Ellen Bruno
Marine Policy Officer