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Point of contact in;  
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**Response in relation to the notification pursuant to Article 3 of the Convention on Environmental Impact Assessment in a Transboundary context (Espoo Convention); regarding the establishment of the Baltic Pipe Project.**

Sweden has received notifications from Denmark, Poland and Germany regarding the Baltic Pipe Project, and gives the following response to the notifications:

- Sweden expresses its wish to participate in the EIA-procedure
- Sweden sends all comments received from Swedish authorities and other stakeholders.

The Swedish Environmental Protection Agency (SEPA) has the responsibility to fulfill the obligations under the Espoo-convention in sending and receiving notifications. SEPA has however no responsibility to neither evaluate the received comments from the national referral procedure nor to provide a unified standpoint for Sweden.

The notifications from Denmark and Poland together with the Baltic Pipe information document have been sent out for consideration to Swedish central and regional authorities, municipalities and concerned organizations. The consultation period lasted from 9 February until 22 March 2018. The consultation has in principle been performed under the same time period as the Swedish developer's national EIA scoping consultation for the Baltic Pipe Project, and with the same list of invited stakeholders. The notifications have also been available on SEPA's website.

SEPA has received 21 replies, of which 10 are statements from national authorities, and two from the County Administrative Board and the Swedish Institute for the Marine Environment respectively. The remaining 9 replies are from stakeholders (concerned municipalities and universities) that have refrained from giving any comments on the project or the scope of the EIA. All of the statements received that contain any comments on the project or the scope of the EIA are attached. The statements are given in Swedish, and will be sent in English once translated.

### **Comments in brief**

Most of the comments received are of general scope, and very few concern specific countries and specific locations of the pipe line. Some of the statements received are identical as those that have been given in the national EIA scoping consultation.

The following comments in brief do not present a full picture of the statements given, but give a short description of the questions and concerns that have been raised.

### **The Swedish Agency for Marine and Water Management**

The aspects deemed relevant are going to be described more closely in the upcoming Espoo report and has no further comments at the moment

### **The Swedish Board of Agriculture**

All fishing organizations should be consulted in this project.

The assessment should include a description of the judicial and economic responsibility in relation to accidents and incidents as well as the consequences in terms of possible changed fishing and trawling patterns as a cumulative result of pipe lines. The Board also stresses the need to assess the impact on all fisheries which use both bottom and pelagic trawl.

### **The Swedish Geotechnical Institute**

The gas pipe project will mostly have local impacts during the construction phase. In the operating phase, transboundary impact can't be ruled out.

The Institute finds that contaminated areas onshore are missing in table 2-1. The Institute also stresses that criteria mentioned, need to be more clearly defined and stringent and that uncertainties in the assessments should be described with a clear explanation as to which of them are subjective estimations and which are based on facts.

### **Swedish Defense Research Agency**

The alternative routing southwest of Bornholm should be avoided since there are marked dumping areas for chemical weapons in that area. The developer has to acknowledge that chemical weapons can be found also at the outskirts of documented dumping sites.

**Swedish Meteorological and Hydrologic Institute (SMHI)**

The most southerly route alternative through the German EEZ should be used because of the limited inflow of saltwater through the Belts and the Sound. The most westerly part should also be routed more to the south in order to minimize the impact of bottom water inflow.

SMHI asks for the result of the surveys to be accessible for SMHI's data hosting.

SMHI also holds that a long-term investment in fossil free energy use in Europe is preferable to additional investments in fossil gas.

**Geological Survey of Sweden (SGU)**

Under construction and pipe laying works, including clearings of weapon, possible contaminated suspended sediments can be spread over administrative borders. Carefulness and precautionary actions need to be taken to minimize such impacts. SGU furthermore provides information about the marine geology in the area and stresses that the pipe and the used material shouldn't hinder the natural spreading of sediment in the area. The added material to cover the pipe should be of the same fraction as the present natural ones.

SGU also point out that the project shouldn't influence the sites for the national sediment monitoring network.

**National Maritime Museums**

The result from the geophysical mapping, mostly indications from the side scanner, have to be analyzed by marine archeologist, to be able to identify possible culture heritage.

**Swedish Transport Administration**

Presents its opinion from a shipping point of view. They support the proposed safety measures and recommend that a risk analysis for the shipping as well as proposals for risk reducing measures should be included in the EIA report.

**Swedish Maritime Administration**

Both the future operation and the laying of the pipe should be planned and carried out so as to not restrict the shipping in terms of deterioration of the navigability, and safety of the shipping.

**Swedish Transport Agency**

The project crosses a number of shipping routes that have been designated as areas of national interests by the Swedish Transport Agency. The project should be carried out in such a way that negative consequences for shipping should be minimized.

**Country Administrative Board (CAB) of Skåne**

The project could impact the Natura 2000 area "Sydvästskaånes utsjövattnen", fishing and cultural heritage. Denmark and Germany should assess how the project on their respective side could lead to consequences on the Natura 2000 area on the Swedish side.

The CAB specially mention impacts on porpoises, seabirds, fish and possible reefs.

The developer furthermore has to take in to account noise, precautionary measures, impacts on water inflow and cumulative impacts from different kinds of projects in the area.

### **Swedish Institute for the Marine Environment**

An extension of the gas infrastructure in the Baltic Sea risks to tie up the energy system for a long time and make it more difficult to realize the Paris agreement.

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For the Swedish Environmental Protection Agency

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### Send list

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### For information

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Miljö- och energidepartementet, Astrid Öfverholm  
Ramböll Sverige AB, Håkan Lindved

Appendixes, statements from (in Swedish):

Jordbruksverket

Havs- och vattenmyndigheten

Statens geotekniska institut, SGI

Totalförsvarets forskningsinstitut, FOI

Sveriges meteorologiska och hydrologiska institut, SMHI

Sveriges geologiska undersökning, SGU

Statens maritima museer, SMM

Trafikverket

Sjöfartsverket

Transportstyrelsen

Länsstyrelsen i Skåne län

Havsmiljöinstitutet