

Photo: Rainal Kurbel



## ELF and Nord Stream Pipeline

Jüri-Ott Salm

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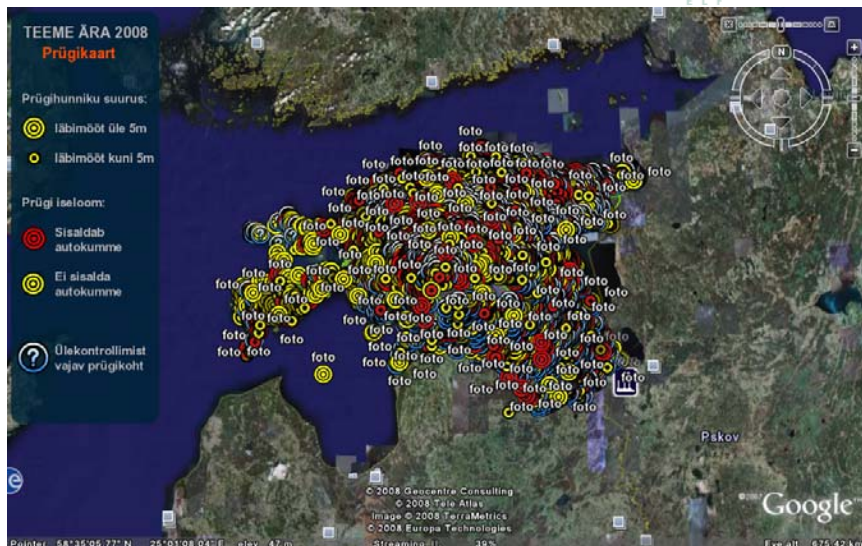
## Estonian Fund for Nature Eestimaa Looduse Fond – ELF

- established in 1991
- independent, non-governmental, non-profit environmental organization
- annual budget app. 750,000 EUR
- 16 permanent staff + 100 field-experts
- 2000 volunteers
- Membership: IUCN, FSC-Estonia, CEEWeb, EMPOWER ...
- Partnership with WWF



## Main Program Areas

- Marine: oil pollution, marine protected areas, eutrophication
- Forestry: sustainable management, protection of high conservation value forests
- Wetlands: restoration, protection, inventories
- Environmental awareness: conservation holidays, nature schools
- Agriculture: sustainable management
- Energy production



- 10 000 tons of garbage mapped with GPS by volunteers
- Cleaned by 30 000 volunteers in 1 May 2008

## **Involvement in NordStream process:**

- Statement of Estonian Naturalists Society and Estonian Council of Environmental NGOs – 5<sup>th</sup> May 2009
- WWF Baltic Ecoregion Position on the Nord Stream Gas Pipeline ESPOO EIA Report – 7<sup>th</sup> May 2009
- Appeal to the Administrative Court of Vaasa, Finland against the permit decision of the Western Finland Permitting Authority concerning munition clearance – 2<sup>nd</sup> November 2009
- Complaint to European Commission – 5<sup>th</sup> January 2010
- Appeal to the Administrative Court of Vaasa, Finland against the permit decision of the Western Finland Permitting Authority concerning building Nord Stream 15<sup>th</sup> March 2010
- Appeal to the Supreme Court of Finland against the permit of the Western Finland Permitting Authority concerning building Nord Stream and the decision taken by the Administrative Court of Vaasa on the matter 5<sup>th</sup> October 2010

### **Estonian MoE sent it's last position to Finland 2<sup>nd</sup> Nov 2009**

Due to enormous immediate and long-term impact to the environment, regional ecosystem services, human health and life quality, and the large amount of uncertainties emerging from the gaps and unanswered questions concerning the Nord Stream EIAs, Estonia finds that the Espoo EIA and the national EIAs have not provided sufficient information as regards of the transboundary environmental impact assessment. Due to the failure of the developer to provide the necessary information, the transboundary aspects of the EIA process of the Finnish EIA and the transboundary impact assessment of the Espoo EIA are unfinished and should be continued.

**In Espoo EIA possible effects on Estonia are covered on  
two pages....**

## WWF Baltic Ecoregion Position on the Nord Stream Gas Pipeline ESPOO EIA Report 5<sup>th</sup> May 2009

- *Evaluation of alternative routes*
- *Explosives and other munitions*
- *Emissions of harmful substances*
- *Eutrophication*
- *Risks for maritime safety*
- *Biodiversity*
- *Natura 2000 network*

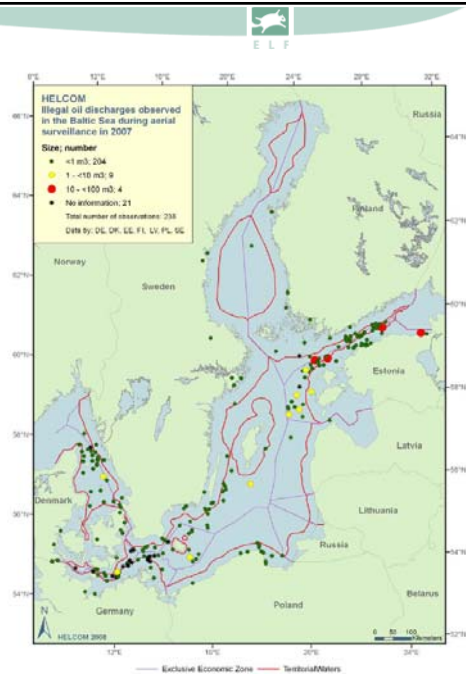


Figure 1. Location of the oil spills observed in the Baltic Sea area in 2007

**Appeal to the Administrative Court of Vaasa against the permit decision No 83/2009/2, Dno LSY-2009-Y-143 of the Western Finland Permitting Authority concerning munition clearance, 2<sup>nd</sup> November 2009**

Permit was given by Finnish authorities on 2<sup>nd</sup> of October '09 to explode 28 munitions in Finnish EEZ

- Splitting the project was accepted by Finnish authorities
- Consultations with Estonia had not been finalized

Court decision: 18.03.2010 – appeal was rejected

## The Estonian Naturalists' Society complaint to the Danish Energy Authority ,16<sup>th</sup> November 2009

Issues: permit by Danish Energy Authority (DEA) for laying of natural gas pipelines in Danish waters, 20<sup>th</sup> October 2009

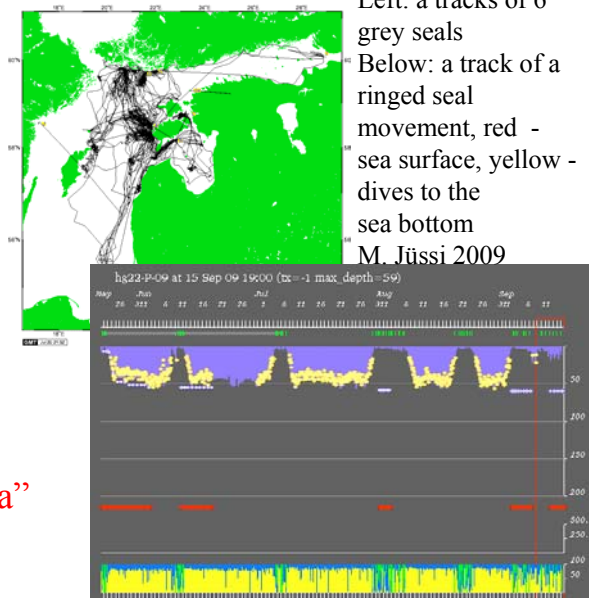
The Energy Board of Appeal finds that the DEA decision of 20<sup>th</sup> October 2009 was taken on a fully sufficient information basis and that no procedural errors or other case-handling deficiencies were committed in connection with issue of the decision. 20<sup>th</sup> of May 2010

**I Appeal** to the Administrative Court of Vaasa against the **permit** decision No 83/2009/2, Dno LSY-2009-Y-143 of the Western Finland Permitting Authority concerning **building Nord Stream pipeline** in Finnish EEZ, 15<sup>th</sup> March 2010

1. **Finnish Association for Nature Conservation Society, Uudenmaa branch**
2. **Estonian Fund for Nature Foundation**
3. **Estonian Naturalists' Society**
4. **Estonian Green Movement-FoE**
5. Estonian Student Society for Environmental Protection Sorex
6. NGO West Coastland
7. NGO Nõmme Road Society
8. Estonian Seminatural Community Conservation Association
9. Tartu Student Nature Protection Circle

## II Appeal to the Administrative Court of Vaasa

- Halt the permit
- Remobilisation of toxic sediments
- Unknown objects
- Seals
- Monitoring
- Wreck of “Russalka”



## III Appeal to the Administrative Court of Vaasa

In case of dioxins, the average 6.49 pg/g WHO-TEQ is reported for 74 samples, with minimum and maximum values of 0.023 and 64.4 pg/g, respectively. The difference between the minimum and maximum is exactly 2800 times!

Dioxins and dioxin-like compounds are by-products of various industrial processes, and are commonly regarded as highly toxic compounds that are environmental pollutants and persistent organic pollutants (POPs). High doses have caused lesions of skin, development defects, and increased the risk of cancer (Kiviranta 2005)



FIGURE 5-1. A map of the Gulf of Finland, showing the impact area of the Ky 5 release from the Kymijoki River (I, Table 3) and the main sampling sites (I, II). Sampling sites for sediment cores have been named.

P. Isosaari (2004)

## IV Appeal to the Administrative Court of Vaasa

Decision on 2<sup>nd</sup> of Sept 2010

- No expertise
- No hearings
- Decision does not include satisfactory proofs on presented arguments

Appeal to the Supreme Court of Finland was sent 4<sup>th</sup> of Oct

## Complaint to European Commission 5<sup>th</sup> January 2010

In the framework of the environmental assessment of the Nord Stream gas pipeline, the risks have not been properly estimated and relevant scientific data have not been taken into account, therefore not following precautionary principle. In most regrettable way the authorities of Finland, Sweden, Denmark, and Germany which are responsible of relevant environmental permits, have ignored the fact that important environmental impacts have been underestimated and have not given sufficient attention to the objections put forward by experts both from their own countries and from affected parties. We believe that the Member States in question have failed to properly implement the Community law (directives 85/337/EEC, 79/409/EEC and 92/43/EEC).



## Conclusions

It should be emphasized that in the context of the Espoo EIA process and the EU EIA directive, almost any activity in the Baltic Sea has certain transboundary impact, direct or indirect, e.g. through the contamination of fishes in the fishing areas used by Estonia and reaching Estonian consumers. Therefore, the immediate availability of all documentation to Estonian authorities should be guaranteed. This documentation should have been available in the Espoo EIA, before any permitting process could have been started.

**Estonian MoE sent it's last position to Finland 2<sup>nd</sup> Nov 2009**

## Thank You!



Contact: Jüri-Ott Salm, [jott@elfond.ee](mailto:jott@elfond.ee), +372 52 95933