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THE MINISTRY OF ENVIRONMENT OF THE REPUBLIC OF LITHUANIA

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**REGARDING THE POSITION OF THE REPUBLIC OF LITHUANIA ON THE
TRANSBOUNDARY IMPACT ASSESSMENT OF THE PROPOSED NORD STREAM GAS
PIPELINE**

We are grateful to the Parties of origin for their official communications of 9 March 2009 on the prepared transboundary environmental impact assessment report (hereinafter 'EIA report') on the Nord Stream pipeline project and the commenced consultations regarding the transboundary environmental impact assessment of this project.

We would like to remind you that on 15 February 2007 the Ministry of Environment of the Republic of Lithuania confirmed to the Parties of origin Lithuania's participation in the transboundary environmental impact assessment process of this project and, taking into account the comments and recommendations of the interested public authorities and scientific institutes, presented the position of Lithuania on the transboundary environmental impact assessment programme wherein the Ministry stressed proper selection of alternative gas pipeline routes (including land routes) and their detailed analysis, the likely impact on the Baltic Sea ecosystem from contact with the dumped munitions, especially the chemical weapon, secondary pollution of the Baltic Sea, the likely effect on Natura 2000 protected areas, likely negative impacts on the socioeconomic environment, especially on the fisheries sector, detailed risk analysis, the countries' actions in case of emergencies, compensation of damages in case of emergencies, etc.

The Ministry of Environment of the Republic of Lithuania, as an authority coordinating the transboundary environmental impact assessment process of the Nord Stream pipeline project in Lithuania, upon receipt of the Nord Stream pipeline environmental impact assessment documentation (the transboundary EIA report, the map and the summary documents), immediately spread this information to the Lithuanian media, public and interested national and municipal authorities, nongovernmental organisations and higher educational establishments. All interested authorities and persons could submit their comments regarding the mentioned documentation to the

Ministry of Environment of the Republic of Lithuania by 8 May of this year.

On 22 and 23 April, the Ministry of Environment of the Republic of Lithuania organised public hearings of the transboundary EIA report at Vilnius University and Klaipėda University, respectively. In addition to representatives of the company Nord Stream AG and the preparers of the environmental impact assessment documentation, the public hearings were also attended by more than 160 representatives of national and municipal authorities, nongovernmental organisations, higher educational establishments and the public. During the discussions, the representatives of Nord Stream AG and the preparers of the environmental impact assessment documentation delivered reports on the Nord Stream gas pipeline project, presented the objectives and results of the environmental impact assessment, focusing on the likely effects of the project on Lithuania, and answered questions from the audience. During the events, the representatives of nongovernmental organisations held protest actions calling on the participants to evaluate the presented analysis and to express their positive or negative stand on the Nord Stream gas pipeline project in special ballots. The participants' comments and questions were mostly concerned with the insufficient objectivity of the EIA report, the need for an independent environmental impact assessment (carried out by organisations unrelated to the implementation of the gas pipeline project), proper analysis of land alternatives for the gas pipeline, the assumption of responsibility by the project operator for potential damage and compensation of potential damage. The audience expressed an interest in the impact of the gas pipeline construction works on human health through the food chain. Unfortunately, this question remained unanswered during the discussions.

The Ministry of Environment of the Republic of Lithuania, upon evaluating public concerns, comments from different authorities and opinions of nongovernmental organisations and scientists (13 written comments received), is presenting the position of the Republic of Lithuania on the Nord Stream gas pipeline project:

1. Objectivity, completeness and reliability of the transboundary EIA report. The impact on each component of the environment (physical, biological and socioeconomic) is assessed individually. However, it is important to conduct a cumulative environmental impact assessment, taking into account the likely long-term impacts and the sensitivity of the Baltic Sea. The conclusions of the EIA report in most cases indicate insignificant impacts or those of little significance. However, an integrated assessment would show larger impacts.

It should also be stressed that a number of important studies related to the project impacts have not been carried out yet¹. Therefore, no generalising or final conclusions about the environmental impact of the Nord Stream gas pipeline can be drawn. As a result of the insufficient and incomplete material provided, the permitting procedures cannot be launched either in the countries where the proposed gas pipeline route is to traverse their territorial waters and exclusive economic zones.

There are grounds for doubt regarding the objectivity and independence of the EIA report. Article 2(3) of the UN Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention, 1991) stipulates that an environmental impact assessment is undertaken prior to a decision to authorize or undertake a proposed activity. Thus, an environmental impact assessment must be carried out in the first place, which will serve as the basis for a decision on the gas pipeline and the commencement of construction. Meanwhile, the Nord Stream environmental impact assessment was undertaken in fact after the decision on project implementation and the commencement of the project (construction of the land part of the gas pipeline in Russia was launched back in December 2005²). The pipeline network in Germany is also

1 Currently, the following studies are being conducted or planned: (1) Munitions survey in the Russian sector of the Baltic Sea (Volume I, Conventional and Chemical Weapons, Chapter 2.2.6, p. 29); (2) studies of long-term impacts on fisheries – based on the results, a scheme compensation for lost catches will be developed (Volume I, Fisheries and Navigation, Chapter 5.2.3, p. 45); (3) anchor corridor survey, with a view to protecting marine cultural heritage (Volume I, Cultural Heritage, Chapter 5.3, p. 41, Chapter 6, p. 43); (4) trawling equipment damage risk assessment (Volume I, Navigation Safety, Chapter 3.3, p. 18); (5) information from Danish authorities regarding the chemical weapons in the Danish territorial waters has not been received (Volume I, Conventional and Chemical Weapons, Chapter 3.1.4, p. 50).

2 In addition, it was only in January 2007 that the first reports appeared about Russian responsible authorities recognizing construction of the mentioned land section of the gas pipeline in the Russian territory as environmentally safe (i.e. construction was commenced prior to the announcement of the EIA results).

being strengthened and new pipelines are under construction. For these reasons, the present environmental impact assessment cannot be recognized as preliminary. By undertaking a belated environmental impact assessment, the company implementing the project only makes a formal demonstration of abiding by the principle of prevention (the need to prevent damages) and the obligation to conduct a preliminary environmental impact assessment arising therefrom, and actually breaches this principle of international law and its obligation. This leads us to suppose that the transboundary EIA report is intended to defend the Nord Stream gas pipeline route construction of which has already commenced rather than seek the best gas transportation alternative, based on the environmental, socioeconomic and technical criteria. Accordingly, there are grounds for doubt regarding the objectivity of the environmental impact assessment process itself and the interest of the stakeholders of the project in undertaking such an assessment in general.

2. Alternatives. The EIA report states that four gas supply routes from Russia to Europe by sea and land were explored in 1997-1999. Thus, the gas pipeline land route is acknowledged as a possible alternative of the gas supply from Russia to Europe. Therefore, it is our opinion that the land alternatives should be subjected to detailed analysis in the EIA report and their impacts should be compared with the impacts of the sea alternatives. The EIA report briefly discusses opportunities of building the gas pipeline on land through the Baltic States and the Scandinavian countries. However, they are discussed as a historical survey of the Nord Stream gas pipeline project rather than as an equivalent place alternative. Construction of the Nord Stream gas pipeline on the bed of the Baltic Sea is identified as the most favourable alternative in terms of the environment, mostly as a result of relatively lower carbon dioxide emissions from the underwater gas pipeline project and a lower impact on protected areas. However, the project does not take into account other sensitive aspects of the Baltic Sea ecosystem: secondary pollution from works on the seabed and the likely contact with the dumped munitions. Nor is there any information on the fact that a new 900-km-long gas pipeline with seven compressor stations, intended to ensure the operation of the Nord Stream gas pipeline, is under construction in the Russian territory. As a result of this new gas pipeline, carbon dioxide emissions practically will not differ from those of the proposed land gas pipeline alternatives.

Thus, taking these aspects into account, we would think that the land alternative of gas pipeline construction must be analysed in detail from the environmental, socioeconomic and other aspects. The main alternatives of the Nord Stream sea gas pipeline project would be the Amber and Jamal-2 gas pipelines that are included in the European Union guidelines on Trans European Energy Networks (TEN-E) as projects of common and of European interest. Therefore, in the absence of detailed analysis of the above-mentioned alternatives, it cannot be maintained that the option of operations chosen by Nord Stream, in particular construction of the gas pipeline on the bed of the Baltic Sea, is an optimal choice from the environmental, socioeconomic, technical and other aspects.

3. Dumped munitions. The Baltic Sea is considered one of the most polluted seas in the world due to the dumped munitions and accumulations of other toxic substances. The munitions dumped in the Baltic Sea are likely to total between 360 000 and 385 000 tonnes, including 40 000 tonnes of chemical weapons. The main dumpsites of the chemical munitions near the proposed Nord Stream gas pipeline route are the areas by the islands of Bornholm (Denmark) and Gotland (Sweden). The EIA report lacks information on the dumped munitions in the Russian territorial waters and economic zone.

The environmental impact assessment report states that 36 dumped munitions have been discovered along the gas pipeline route. However, even state-of-the-art search and underwater surveillance systems do not always allow noticing and identifying with accuracy objects located under a thick layer of sludge or sediment.

It is noteworthy that all components of the chemical weapons are toxic, genotoxic and cytotoxic and most of them are carcinogenic, posing a serious ecotoxicological risk. The accumulation of these dangerous substances in fish is a serious human health hazard (through food).

4. Secondary pollution. Analysis of the maps of the EIA report shows that the levels of pollutants in the seabed sediment vary greatly in 2005-2008, which should not be the case in correct studies. In 2005, very high concentrations of heavy metals and organic pollutants were detected in soil samples from the gas pipeline route. In 2006 and 2007, the levels of pollution were already

lower, but in 2008 the same sites showed high concentrations again. The data of the genotoxic impact of heavy metals and petrochemicals demonstrate that the levels of pollutants along the proposed gas pipeline route (according to 2005 statistics) by several hundred and even several thousand times exceed those levels that have a genotoxic effect on fish and molluscs³. The soil samples show that the seabed sediment on the Nord Stream route contains cadmium up to 10 mg/kg, copper, chromium, lead up to 100 mg/kg, nickel up to 30 mg/kg, zinc up to 300 mg/kg and 16 polycyclic aromatic hydrocarbon metabolites (hereinafter 'PAHs') up to 2.5 mg/kg. Meanwhile, genotoxicity in fish is observed with the heavy metal mixture containing cadmium (0.005 mg/l), copper, nickel, chromium (0.01 mg/l), lead (0.005 mg/l) and zinc (0.1 mg/l)⁴. Cadmium, chromium and nickel levels in the southern Natura 2000 sites of the gas pipeline route are hundreds and thousands times higher. Therefore, the statement that, in traversing the Natura 2000 sites in the southern part of the gas pipeline route, the impact from the spread of sediment and sedimentation will be insignificant (Table 10.11, p. 1535) is not true.

The presented ecotoxic impact assessment is superficial and inadequate, as it only includes turbidity changes and modelling only the spread of copper and 16 PAHs in construction of the gas pipeline in the Finnish Bay. However, other carcinogenic and genotoxic compounds will rise up with suspended solids as well. We would like to note that genotoxicity of the environment in the Finnish Bay and the southern part of the Baltic Sea near Germany and Poland is considerably higher compared to unpolluted areas in this sea⁵. The acquaintance with scientific literature data on the level of pollution in the Finnish Bay and its hydrographic features makes it obvious that particularly toxic, genotoxic and carcinogenic compounds will be raised from the seabed and will spread with the current fairly widely. In addition, the EIA report does not discuss the ecotoxic impact of dioxins, as well as the impact of pesticide metabolites in the Natura 2000 sites of the southern part of the gas pipeline route.

It should be noted that the assessment of the geological engineering conditions of the gas pipeline is inadequate. On the route of the proposed gas pipeline, the thickness of sludge in some places exceeds 10 metres, and the gas pipeline would sink about two metres into the sludge. Studies of the sludge composition in those places and the likely impact from its spread need to be carried out.

The statement of the developers of the EIA documents that the movement of the seabed

3 J. Baršienė, V. Dedonytė, A. Rybakovas, K. Broeg, L. Forlin, J. Gercken, J. Kopecka, L. Balk. Environmental mutagenesis in different zones of the Baltic Sea // *Acta zoologica Lituanica: parasitologia, ornithologia, entomologia/Institute of Ecology* 2005, vol. 15, no. 2, p. 90-95.

Baršienė, J., Lehtonen, K., Koehler, A., Broeg, K., Vourinen, P. J., Lang, T., Pempkowiak, J., Šyvokienė, J., Dedonytė, V., Rybakovas, A., Repečka, R., Vountisjarvi, H. and Kopecka, J. 2006. Biomarker responses in flounder (*Platichthys flesus*) and mussel (*Mytilus edulis*) in the Klaipėda-Būtingė area (Baltic Sea). *Marine Pollution Bulletin* 53: 422-436.

Baršienė, J., Schiedek, D., Rybakovas, A., Šyvokienė, J., Kopecka, J. and Forlin, L. 2006. Cytogenetic and cytotoxic effects in gill cells of the blue mussel *Mytilus* spp. from different zones of the Baltic Sea. *Marine Pollution Bulletin* 53: 469-478.

Baršienė, J., Dedonytė, V., Rybakovas, A., Andreikėnaitė, L. and Andersen, O. K. 2006. Investigation of micronuclei and other nuclear abnormalities in peripheral blood and kidney of marine fish treated with crude oil. *Aquatic Toxicology* 78 (Suppl. 1): 99-104.

Baršienė, J. 2006. Relevance of micronucleus test for the mutagenicity assessment in marine environment. *Marine Environmental Research* 62: S306-S307.

Baršienė, J., Rybakovas, A., Broeg, K., Schiedek, D., Lang, T., Forlin, L., Pempkowiak, J., Gercken, J. and Balk, L. 2006. Micronuclei in fish and mussels from different sites of the Baltic Sea. *Marine Environmental Research* 62: 315-316.

4 Andreikėnaitė, L., Baršienė, J. and Vosyliene, M. Z. 2007. Studies of micronuclei and other nuclear abnormalities in blood of rainbow trout (*Oncorhynchus mykiss*) treated with heavy metal mixture and road maintenance salts. *Acta Zoologica Lituanica* 17 (3): 213-219.

5 Baršienė, J., Lehtonen, K., Koehler, A., Broeg, K., Vourinen, P. J., Lang, T., Pempkowiak, J., Šyvokienė, J., Dedonytė, V., Rybakovas, A., Repečka, R., Vountisjarvi, H. and Kopecka, J. 2006. Biomarker responses in flounder (*Platichthys flesus*) and mussel (*Mytilus edulis*) in the Klaipėda-Būtingė area (Baltic Sea). *Marine Pollution Bulletin* 53: 422-436.

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Baršienė, J., Rybakovas, A., Förlin, L. and Šyvokienė, J. 2008. Environmental genotoxicity studies in mussels and fish from Göteborg area of the North Sea. *Acta Zoologica Lituanica* 18 (4): 240-247.

sediment will only have a short-term reversible effect raises doubts. If genetic injuries are caused in organisms they could be passed on to next generations, which will result in an irreversible long-term effect, as genetic and carcinogenic injuries are not attributed to reversible phenomena. Thus, the EIA could not make statements about the reversibility of effects. As no long-term (genotoxic, carcinogenic, immunotoxic, etc.) environmental effects of hazardous compounds are presented, the EIA report cannot be considered a comprehensive assessment of environmental risks. Genetic injuries are caused even by very low levels of pollution (e.g. oil) and extremely quickly (within several hours) after the spread of those pollutants.

In addition, the Nord Stream route crosses areas where biota is extremely varied. For this reason, it can be maintained that the effect of pollutants in these areas will be especially harmful and fairly damaging to the populations of genetically unique organisms.

5. Fisheries. Lithuanian catches of cod in the Danish exclusive economic zone (near the island of Bornholm) account for more than 50% of the cod quota. The proposed Nord Stream project will have an adverse effect on fisheries due to the noise and increased water turbidity resulting from construction of the gas pipeline, likely oil spills and the spread of toxic substances in the water after the seabed sediment is moved. These factors can have an adverse impact on spawning, cause malformations, intoxicate fish and damage their nutritional base. The loss of fishing areas, the increase in length of fishing routes and increased fishery costs due to the acquisition of new fishing gear will have a direct long-term adverse effect on the Lithuanian fisheries. The transboundary environmental impact assessment report does not contain any procedure of calculating losses for fishermen and the size of damages.

Effects on individual components of the environment cannot be assessed in isolation of each other, as in nature the functioning of ecosystems is characterised by synergy (different components influence each other through various relations, for example, nutritional or geological/physical). Thus, increased turbidity, emissions, noise, vibrations, etc. affect the whole of the Baltic ecosystem. Fish stocks and mammals are not located in one place, but they migrate in a considerably larger area. Changes in the Baltic Sea fish stocks will affect all countries around the Baltic Sea through the quota assignment system.

6. Tourism and recreation. The transboundary EIA report only contains analysis of the impacts on tourism and recreation sectors of Russia, Germany, Finland, Sweden and Denmark. As this sector is especially sensitive to potential changes in the environment, it is necessary to assess the impact on the tourism and recreation sectors also of other Baltic countries, including Lithuania. We would like to note that the Baltic seacoast of Lithuania has been identified as the country's area with the greatest tourism and recreation potential and its main recreation and tourism site. The Baltic seacoast has two Lithuanian resorts, Palanga and Neringa. Other sites of importance for tourism include the Curonian Spit National Park (the Curonian Spit is a UNESCO heritage site), the Seaside Regional Park and the Palanga Botanical Garden. The beaches of Nida and Palanga have been rated by an international 'blue flag'. Therefore, compensation mechanisms should be planned for the lost income and investments of the tourism sector if such effects would be caused by an accident during construction or operation of the Nord Stream gas pipeline.

7. Natura 2000 sites. The proposed gas pipeline route will cross six Natura 2000 sites and will pass close by another 21 protected areas containing zones of concentration of especially valuable and endangered species of fauna (mostly birds). Destruction of the soil and noise resulting from construction and operation of the gas pipeline may disturb marine animals and birds. Although the EIA report claims that construction of the gas pipeline will only cause short-term and insignificant effects on these sites and their protected species, it should be noted that the conclusion has an insufficient justification. In addition, even a small and short-term effect on protected and endangered species can be critical and become the main cause of their extinction. For this reason, we are of the opinion that pursuant to the provisions of Article 6(4) of Council Directive 92/43/EC (Habitats Directive), it would be reasonable to obtain a preliminary opinion from the European Commission on project implementation.

8. Geology. Chapter 2.1.1 Geological Conditions, Volume I, and Chapter 8.5.4 Seabed Structure and Processes, Volume II, of the report have been prepared incompetently and are overly general. The seismic activity of the Baltic Sea region and related risks in construction and operation of the gas pipeline are not assessed. We would like to bring it to your attention that this aspect was

stressed also at the meeting of experts organised by the German Federal Maritime and Hydrographic Agency on 16-17 September 2008 in Hamburg. Map GE-1 only shows a very general geological structure of the Pre-Quaternary rock and crystal base, excluding all tectonic breaks (the most recent data are not used), and the text of the report contains an incorrect statement that the seismic activity in the region is insignificant. However, two earthquakes that occurred on 21 September 2004 in the coastal zone of the Baltic Sea, the Kaliningrad region, and measured 4.4 and 5.0 in magnitude, and a series of smaller earthquakes with epicentres in the Baltic Sea area that were recorded by the seismic stations in the recent decades testify to the seismic activity in this region. For this reason, seismic events and the likely impact of their after-effects, including segregation, underwater landslides, etc., on the proposed Nord Stream gas pipeline should be assessed.

9. **Military exercise areas.** Map MI-1 Military Exercise Grounds of the EIA report (Volume IV) does not show Lithuanian military shooting danger and exercise areas (EYD17 and EYD18) or Russian navy exercise sites. The transboundary EIA report should assess the impact of the military activity in the Baltic Sea on the operation of the gas pipeline and the likelihood of accidents, and this aspect must also be incorporated into the risk assessment, as the proposed gas pipeline route crosses areas of military exercises and underwater actions.

10. **Ensuring safety and actions in case of emergencies.** In case of a gas leak that has a great impact, the gas pipeline will be shut off by an emergency valve. However, there are no plans to install separate valves to shut off individual sections of the gas pipeline. In our opinion, installation of valves along the gas pipeline route would increase safety and allow carrying out maintenance on a separate section of the gas pipeline without greater risks of gas leaks. In addition, the increased navigation during the construction and operation of the Nord Stream gas pipeline will enhance the likelihood of accidents and related pollution. Any accident or a similar emergency may result in gas leaks or oil spills. Detailed information on who will carry out emergency response and how that will be done is lacking. As all countries are identified as affected Parties, a system uniting all countries of the Baltic Sea should be developed that would provide for equipment intended for response to potential emergencies in the sea, emergency response actions and rapid response forces.

Under the project, to reduce external corrosion, protective anodes made from indium activated aluminium as well as zinc anodes (both types of anodes contain traces of cadmium) will be installed at regular intervals in the gas pipeline, which will affect water quality when coming into contact with it. Quantities (tonnes) of alloys of both aluminium and zinc for each sub-region and for the total gas pipeline are presented. The report provides rates of release (g/h) of metals (aluminium, cadmium, copper, lead and zinc) from the anodes, calculations of their concentrations in seawater around the gas pipeline and the background and acceptable levels in water based on the North Sea OSPAR ecotoxicological assessment criteria. We believe that it would be reasonable to calculate the quantity of their emissions during the whole life of the gas pipeline and their cumulative (long-term) effect. Applying OSPAR criteria to the Baltic Sea is not correct as other background and limit values of dangerous substances should be used for the Baltic Sea due to its specific features and differences from the OSPAR region. International directives and the HELCOM Baltic Sea Action classify cadmium as a hazardous substance of specific concern that requires measures to reduce its release into the Baltic Sea.

11. **Compensation of damages.** It is not clear who will be liable for the adverse effects on the Baltic Sea ecosystem. A mechanism (legal measures) and guarantees must be in place to compensate for likely damages to the countries of the Baltic Sea region as a result of the project. It is our opinion that the company implementing the project must have insurance against events likely to cause damages. The question of compensation of potential damages should be solved in full prior to any permitting of construction. Nord Stream AG should assume all responsibility for compensation of damages.

12. **Monitoring of the environment.** Environmental monitoring programmes (or at least requirements) are absent that should be agreed with countries issuing permits. We propose to foresee that international monitoring would be carried out by independent experts. In the meeting of experts organised by the German Federal Maritime and Hydrographic Agency on 16-17 September 2008 in Hamburg, a report was delivered on the monitoring programme preparation methodology, but the transboundary EIA report does not contain this information. The experts' meeting was also informed of plans to introduce environmental monitoring in all phases of the project and to carry out

such monitoring in the countries issuing permits. As the EIA report distinguishes likely transboundary impacts, a question arises about the submission of monitoring results and information on the recorded impacts to the affected Parties, including Lithuania. A procedure of providing information on the project that would involve the communication of environmental monitoring information and preliminary results to the affected Parties should be framed.

13. **Decommissioning of the gas pipeline.** We lack more detailed information and environmental impact analysis after the decommissioning of the gas pipeline. The report states that of the two options, i.e. removal of the pipeline or leaving it on the seabed, the latter option would be the preferred one. In this case the corrosion of the pipes and the release of dangerous substances into the sea have not been assessed.

14. **Post-project analysis.** Considering the scale of the Nord Stream gas pipeline project and its likely adverse impacts on the Baltic Sea ecosystem, we believe that post-project analysis will be necessary after implementation of the project.

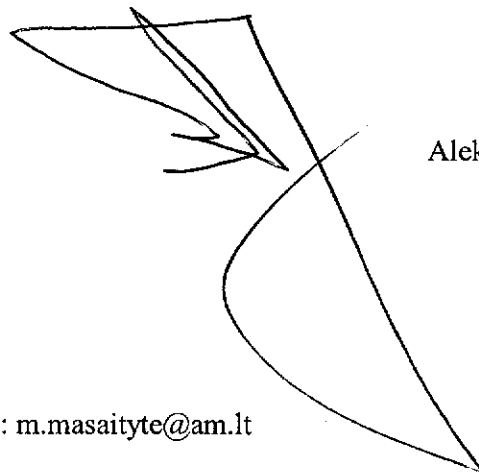
15. **Links with other proposed projects.** The Swedish national EIA summary does not mention the Baltic-Swedish electricity link with which the Nord Stream gas pipeline should intersect in the future. The Baltic-Swedish electricity link is not shown on the maps of the project either. However, the proposed Baltic Pipe from Denmark to Poland is mentioned in the Danish national EIA summary and shown on the maps. Construction of the gas pipeline may obstruct implementation of this energy project important for the Baltic States, as running the cable on the Baltic Sea bed will require approval from the operators of the Nord Stream gas pipeline project.

We are of the opinion that the location of the proposed Nord Stream gas pipeline (the route running lengthwise in the Baltic Sea) will greatly restrict the planning and implementation of projects of various activities in the Baltic Sea, as in most cases adjustments will have to be made to the restrictions caused by the Nord Stream gas pipeline.

16. **Transboundary environmental impact assessment procedure.** A question arises whether the Parties of origin will hold consultations with the affected Parties on the positions presented by the countries, prior to the issuance of permits for construction of the gas pipeline.

Given the above comments and argument, as well as the absence of answers to the problems specified in European Parliament resolution of 8 July 2008 on the environmental impact of the planned gas pipeline in the Baltic Sea to link up Russia and Germany⁶, it is our opinion that the level of detail of the transboundary EIA report is not sufficient to discuss the issues regarding the permits for construction and operation of the gas pipeline in the Parties of origin. We consider that some parts of the transboundary EIA report must be supplemented not only with more extensive analysis but also with data of new studies and their assessment.

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⁶ European Parliament resolution of 8 July 2008 on the environmental impact of the planned gas pipeline in the Baltic Sea to link up Russia and Germany (Petitions 0614/2007 and 0952/2006) (2007/2118(INI)).

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