To the Danish Environmental Protection Agency,

Aalborg University has no remarks concerning the Espoo consultation of affected Danish public authorities and stakeholder organisations regarding the project to establish and operate the “Nord Stream 2” gas pipeline between Russia and Germany.

Yours sincerely,
Bisera Bratovic

AALBORG UNIVERSITY
Bisera Bratovic
Administrative Office - Journal | Communications Department
Faculty Office for ENGINEERING, SUND and TECH

Tel.: (+ 45) 9940 9646 | Email bb@adm.aau.dk | Web: www.aau.dk
Aalborg University | Niels Jernes Vej 10 | Aalborg Øst | EAN: 5798000420632
Information on the consultation process and consultation letters, Espoo report and Espoo Atlas has been published on the Danish Environmental Protection Agency’s website as of this date:


As the material is very large, it is not attached to this e-mail.

There is a response deadline for remarks of 20 June 2017. Remarks must be sent to mst@mst.dk marked “Nord Stream 2 j.nr. SVANA-137-00048”.

The Danish Environmental Protection Agency will then collate and forward the consultation responses to the respective countries. Please state which country or countries your consultation response is intended for.

Best regards,

Karin Anette Pedersen,
Point of Contact for Notifications and Focal Points for Administrative Matters (Espoo)
Nature Management
+45 72 54 47 42 | +45 93 58 80 94 | kaape@mst.dk
Environmental Protection Agency
Ministry of the Environment and Food of Denmark | Haraldsgade 53 | 2100 Copenhagen Ø | Tel.
+45 72 54 20 00 | mst@mst.dk | www.mst.dk
From: Lars Møller
Sent: Friday, June 16, 2017 1:59:21 PM (GMT+02:00)
To: MST Danish Environmental Protection Agency’s main mailbox
Cc: Anne Skov Struver; Peter Veraae
Subject: RE: Nord Stream 2 journal no. SVANA-137-00048 Espoo consultation of affected
Danish public authorities and stakeholder organisations concerning the project to establish and operate
the “Nord Stream 2” gas pipeline between Russia and Germany

Nature Management has requested the Danish Working Environment Authority’s remarks concerning
the Espoo consultation regarding the project to establish and operate the “Nord Stream 2” gas pipeline
between Russia and Germany; see the e-mail shown below.

The Danish Working Environment Authority declines to submit any remarks concerning the Espoo
consultation as the construction works and operation of Nord Stream II do not concern the scope of the
Offshore Safety Act.

Yours sincerely,

Lars Møller
Civil Engineer
T +45 72 20 91 99 | lrn@at.dk

Danish Working Environment Authority | Postbox 1228 | 0900 Copenhagen C
T +45 70 12 12 88 | at@at.dk | www.arbeidstilsynet.dk

From: Karin Anette Pedersen
Sent: 25 April 2017 15:16
To: mail@lfst.dk; MB-CU2518 SLKS main mailbox; Danish Working Environment Authority;
fmn@fmn.dk; Danish Maritime Authority Main mailbox (SFS); GST - Danish Geodata Agency’s main
mailbox; um@um.dk; Danish Energy Agency's official mailbox; dn@dn.dk; dof@dof.dk;
info.dk@greenpeace.org; info@ecocouncil.dk; emv@emv.dk; fmn@fmn.dk; trm@trm.dk; brs@brs.dk;
$Danish Coastal Authority (kdi); MB-CU2518 SLKS main mailbox; mail@dkfisk.dk;
post@sportsfiskerforbundet.dk; danskakvakultur@danskakvakultur.dk; info@dongenergy.com;
info@energinet.dk; fr@friluftsradeet.dk; regioner@regioner.dk; kl@kl.dk; aau@aau.dk; au@au.dk;
dce@au.dk; dtu@ad.dtu.dk; aqua@aqua.dtu.dk; ku@ku.dk; ruc@ruc.dk; sdu@sdu.dk; geus@geus.dk;
Gert Agger
Cc: Katja Scharmann; Nina Hanne Holst
Subject: Espoo consultation of affected Danish public authorities and stakeholder organisations
concerning the project to establish and operate the “Nord Stream 2” gas pipeline between Russia and
Germany

To affected public authorities and stakeholder organisations in Denmark
Pursuant to Articles 4 and 5 of the Espoo Convention, Russia, Finland, Sweden and Germany have submitted consultation letters, the Espoo report and an Espoo atlas, which give an account of cross-border environmental impacts arising from the project, in the Espoo consultation in Denmark.

Information on the consultation process and consultation letters, Espoo report and Espoo Atlas has been published on the Danish Environmental Protection Agency’s website as of this date:


As the material is very large, it is not attached to this e-mail.

There is a response deadline for remarks of 20 June 2017. Remarks must be sent to mst@mst.dk marked “Nord Stream 2 j.nr. SVANA-137-00048”.

The Danish Environmental Protection Agency will then collate and forward the consultation responses to the respective countries. Please state which country or countries your consultation response is intended for.

Best regards,

Karin Anette Pedersen,
Point of Contact for Notifications and Focal Points for Administrative Matters (Espoo)
Nature Management
+45 72 54 47 42 | +45 93 58 80 94 | kaape@mst.dk
Environmental Protection Agency
Ministry of the Environment and Food of Denmark | Haraldsgade 53 | 2100 Copenhagen Ø | Tel. +45 72 54 20 00 | mst@mst.dk | www.mst.dk
The Danish Energy Agency’s response to:

Espoo consultation of affected public authorities and stakeholder organisations regarding the project to establish and operate the “Nord Stream 2” gas pipeline between Russia and Germany

“Nord Stream 2 j. no. SVANA-137-00048”

With reference to the Danish Environmental Protection Agency’s e-mail of 25 May 2017, the Danish Energy Agency hereby sends its remarks concerning the Espoo report and associated appendices. The consultation response concerns Russia, Finland, Sweden and Germany.

General
1. It is noted that the Danish authorities have not had any opportunity to establish an advance dialogue with the company concerning the content of both the national Danish EIA and the Espoo report; hence any changes in the EIA for the Danish area as a result of remarks submitted by Danish authorities are not reflected in the Espoo report.

Specific remarks
   During the breeding season of the various seal species, it should be clarified in the section that they correspond with the breeding seasons specified in Table 9-12. Table 9-12 shows that ringed seal and grey seal have their breeding season (in the Baltic Sea) during the winter, while harbour seal have their breeding season during the summer.

3. Page 56, section 4.4 indicates the following:
   In addition to the consultation on the PID outlined above, Nord Stream 2 has had numerous meetings with Espoo stakeholders and/or contacts in all Parties of Origin and all potentially Affected Parties. The aim of these meetings was to ensure that the content of the Espoo Report addresses all issues which are important to the various countries. Table 4-2 summarises where and when these meetings took place. In addition to these meetings, Nord Stream 2 AG had, within the framework of the national permitting processes, over 200 meetings with all relevant authorities, NGOs and other stakeholders such as fishermen in the different countries.

   The section gives the impression that the final Espoo report and the national EIM for Denmark are partly the result of a dialogue between Nord Stream 2 AG and the Danish authorities. The Danish Energy Agency wishes to point out that, from the middle of 2016 until April 2017, it was not possible for the Danish authorities to consider the case, as they were waiting for a response from the European Commission regarding Nord Stream 2. For this reason, Denmark has also been unable to participate in the previous Espoo meetings between the countries (Parties of Origin). Against this background, it should be clarified that the Danish authorities have not had any opportunity to comment on the final Espoo report or the national EIA. For the above reason, any remarks which may have been submitted by the Danish authorities regarding the final national EIA for Denmark are therefore not reflected in the final Espoo report.
4. Page 62 ‘Route alternatives in Denmark – Bornholm’

It is stated in this section that “On the basis of the limitations described above and by applying the ALARP (As Low As Reasonably Practicable) principle, the final route for NSP was recommended by the Danish Energy Agency.”

The Danish Energy Agency does not believe this statement to be true. A letter dated 13 January 2008 from the Danish Energy Agency to Nord Stream AG states that “On the basis of the above, it is the Danish Energy Agency’s belief that the possibility of establishing the pipeline on an alignment south of Bornholm should be investigated with a view to assessing whether this alignment would be more appropriate than the northern route from a safety perspective”. This is not a direct recommendation that the final route for NSP be located along a southerly alignment.

5. Page 71, Figure 5.5

The FS route is shown in the figure. This route is not described in section 5.4.5 ‘Alternative routes for NSP2 in Danish territorial waters’.


It is not clear what constitutes quantitative risk and what constitutes individual risk, or how Nord Stream 2 AG relates to the thresholds that have been adopted.

7. Page 585

It is stated that Denmark only shares an EEZ boundary with Sweden and Germany. This is not true. On the contrary, it is apparent from page 584 that Poland shares an EEZ boundary with Denmark, Sweden and Germany.
From: 1-DEP Consultations  
Sent: Tuesday, May 30, 2017 10:24:34 AM (GMT+02:00)  
To: MST Danish Environmental Protection Agency’s main mailbox  
Subject: Nord Stream 2 journal no. SVANA-137-00048 Espoo consultation of affected Danish public authorities and stakeholder organisations concerning the project to establish and operate the “Nord Stream 2” gas pipeline between Russia and Germany

To the Danish Environmental Protection Agency

The Ministry of Industry, Business and Financial Affairs has no remarks concerning the submitted consultation document.

‘From October 2015, all regulation with direct consequences for industry (see the Guidance concerning business economics impact assessments) will enter into force on one of two common effective dates, either 1 January or 1 July.’

Yours sincerely,
Emilie Friberg

From: Karin Anette Pedersen  
Sent: 25 April 2017 15:27  
To: dtu@adm.dtu.dk; 1-DEP The Ministry of Industry, Business and Financial Affair’s official mailbox  
Subject: Espoo consultation of affected Danish public authorities and stakeholder organisations regarding the project to establish and operate the “Nord Stream 2” gas pipeline between Russia and Germany.

To affected public authorities and stakeholder organisations in Denmark

Pursuant to Articles 4 and 5 of the Espoo Convention, Russia, Finland, Sweden and Germany have submitted consultation letters, the Espoo report and an Espoo atlas, which give an account of cross-border environmental impacts arising from the project, in the Espoo consultation in Denmark.

Information on the consultation process and consultation letters, Espoo report and Espoo Atlas has been published on the Danish Environmental Protection Agency’s website as of this date:


As the material is very large, it is not attached to this e-mail.

There is a response deadline for remarks of 20 June 2017. Remarks must be sent to mst@mst.dk marked “Nord Stream 2 j. nr. SVANA-137-00048”.

The Danish Environmental Protection Agency will then collate and forward the consultation responses to the respective countries. Please state which country or countries your consultation response is intended for.

Best regards,
Karin Anette Pedersen,
Point of Contact for Notifications and Focal Points for Administrative Matters (Espoo)
Nature Management
+45 72 54 47 42 | +45 93 58 80 94 | kaape@mst.dk
Environmental Protection Agency
Ministry of the Environment and Food of Denmark | Haraldsgade 53 | 2100 Copenhagen Ø | Tel.
+45 72 54 20 00 | mst@mst.dk | www.mst.dk
Dear Karin

The Danish Geodata Agency does not relate to Espoo, as the Agency’s role in this context is limited to the issuing of survey permits in Danish territorial waters.

Yours sincerely,

Søren C. Andersen

---

From: Søren W. Jørgensen On behalf of GST - The Danish Geodata Agency’s main mailbox
Sent: 25 April 2017 15:23
To: Katrine Petersen
Subject: FW: Espoo consultation of affected Danish public authorities and stakeholder organisations regarding the project to establish and operate the “Nord Stream 2” gas pipeline between Russia and Germany

Dear Katrine,
Sending this to you as agreed.

Regards,
Søren.

Søren W. Jørgensen
Receptionist
D. +45 7254 5553
E. soewj@sdfe.dk

Danish Agency for Data Supply and Efficiency
Rentemestervej 8
2400 Copenhagen NV

T. +45 7254 5500
W. www.sdfe.dk
From: Karin Anette Pedersen  
Sent: 25 April 2017 15:16  
Til: mail@lfst.dk; MB-CU2518 SLKS main mailbox; Danish Working Environment Authority; fmn@fmn.dk; Danish Maritime Authority Main mailbox (SFS); GST - Danish Geodata Agency’s main mailbox; um@um.dk; Danish Energy Agency’s official mailbox; dn@dn.dk; dof@dof.dk; info.dk@greenpeace.org; info@ecocouncil.dk; emv@emv.dk; fmn@fmn.dk; trm@trm.dk; brs@brs.dk; $Danish Coastal Authority (kdi); MB-CU2518 SLKS main mailbox; mail@dkfisk.dk; post@sportsfiskerforbundet.dk; danskakvakultur@danskakvakultur.dk; info@dongenergy.com; info@energinet.dk; fr@friluftsradaet.dk; regioner@regioner.dk; kl@kl.dk; aaau@aaau.dk; au@au.dk; dce@au.dk; dtu@ad.dtu.dk; aqua@aqua.dtu.dk; ku@ku.dk; ruc@ruc.dk; sdu@sdu.dk; geus@geus.dk; Gert Agger  
Cc: Katja Scharmann; Nina Hanne Holst  
Subject: Espoo consultation of affected Danish public authorities and stakeholder organisations regarding the project to establish and operate the “Nord Stream 2” gas pipeline between Russia and Germany

To affected public authorities and stakeholder organisations in Denmark

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Information on the consultation process and consultation letters, Espoo report and Espoo Atlas has been published on the Danish Environmental Protection Agency’s website as of this date:


As the material is very large, it has not been attached to this e-mail.

There is a *response deadline for remarks of 20 June 2017*. Remarks must be sent to mst@mst.dk marked “Nord Stream 2 j.nr. SVANA-137-00048”.

The Danish Environmental Protection Agency will then collate and forward the consultation responses to the respective countries. Please state which country or countries your consultation response is intended for.

Best regards,

Karin Anette Pedersen,  
Point of Contact for Notifications and Focal Points for Administrative Matters (Espoo)  
Nature Management  
+45 72 54 47 42 | +45 93 58 80 94 | kaape@mst.dk  
Environmental Protection Agency  
Ministry of the Environment and Food of Denmark | Haraldsgade 53 | 2100 Copenhagen Ø | Tel.  
+45 72 54 20 00 | mst@mst.dk | www.mst.dk
Espoo consultation of affected Danish public authorities and stakeholder organisations regarding the project to establish and operate the “Nord Stream 2” gas pipeline between Russia and Germany

Pursuant to Articles 4 and 5 of the Espoo Convention, Russia, Finland, Sweden and Germany have submitted consultation letters, the Espoo report and an Espoo atlas, which give an account of cross-border environmental impacts arising from the project, in the Espoo consultation in Denmark.

The Danish Environmental Protection Agency has no remarks concerning the Espoo consultation.

Yours sincerely,

Gert Agger
+45 93 58 80 88
geagg@mst.dk
The Danish Safety Technology Authority has no remarks.

Yours sincerely,
Sebastian

DANISH SAFETY TECHNOLOGY AUTHORITY

Sebastian Marcus Andersen
Administrative Officer

Direct line: +45 33 73 20 87
Mobile: +45 25 10 39 87
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Til ERST, KFTS, FT, SIK and SFS

The consultation is hereby sent to you: Espoo consultation of affected Danish public authorities and stakeholder organisations regarding the project to establish and operate the "Nord Stream 2" gas pipeline between Russia and Germany.

Please send any remarks to hoeringer@evm.dk by no later than 2017.

If the Agency has not been consulted directly, please send the consultation response to the Ministry anyway, as the Ministry will prepare a combined consultation response.

NB: If the Agency has no remarks concerning the consultation, please notify the Ministry accordingly.

Yours sincerely,
Helene Starup

From: Karin Anette Pedersen
Sent: 25 April 2017 15:27
To: dtu@adm.dtu.dk; 1-DEP The Ministry of Industry, Business and Financial Affair’s official mailbox
Subject: Espoo consultation of affected Danish public authorities and stakeholder organisations regarding the project to establish and operate the "Nord Stream 2" gas pipeline between Russia and Germany.

To affected public authorities and stakeholder organisations in Denmark

Pursuant to Articles 4 and 5 of the Espoo Convention, Russia, Finland, Sweden and Germany have submitted consultation letters, the Espoo report and an Espoo atlas, which give an account of cross-border environmental impacts arising from the project, in the Espoo consultation in Denmark.

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The Danish Environmental Protection Agency will then collate and forward the consultation responses to the respective countries. Please state which country or countries your consultation response is intended for.

Best regards,

Karin Anette Pedersen,
Point of Contact for Notifications and Focal Points for Administrative Matters (Espoo)
Nature Management
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Environmental Protection Agency
Ministry of the Environment and Food of Denmark | Haraldsgade 53 | 2100 Copenhagen Ø | Tel. +45 72 54 20 00 | mst@mst.dk | www.mst.dk
With reference to the Danish Environmental Protection Agency’s email of 25 April (j. no. SVANA-137-00048) and ENS’s written communication of 10 May (j. no. 201610638), it is noted that the Danish Maritime Authority only considered matters pertaining to maritime safety when we reviewed the EIA and ESPOO material we received.

General:

- The Danish Maritime Authority views in a positive light the statement that DP vessels, rather than anchored vessels, are expected to be used in Danish territorial waters. This will enable the temporary restriction zones around the vessels to be reduced in size.
- Because the pipelines in Danish waters will be located at water depths of between 28 and 96 metres, they are not expected to be of any significance for maritime safety during the operating phase. Only the 2x200-metre protection zone which includes a ban on anchoring and fishing using bottom-trawling fishing gear could be of minor importance.

EIA - No technical resume:

- Section 6.14
  It is stated that restriction zones are expected to extend 2000 metres around laying vessels and 500 metres around assisting vessels. In connection with work in and close to TSS Adlergrund, the restriction zone should be minimised in extent and wherever possible limited to a maximum of 1,000 metres.
- Section 6.21.1
  It is apparent from this section that, during exercises, "ships are strictly prohibited from entering these areas". This is not true! During exercises, there is a warning to others to show consideration and wherever possible to stay away from the zone, but there is no ban prohibiting entry. Firing will be suspended if any other ships enter the exercise area.

Atlas EIA:

- Chart PR-02-D
  Nord Stream 2 AG should be asked to provide a more detailed account of the crossing of TSS Adlergrund and what the German maritime authorities' attitude is regarding the crossing and the potential connection right at the end of TSS (the Danish Maritime Authority is in contact with the German authorities).

EIA:

- Section 6.4.3
Figure 6-21 shows the options for a potential connection, where no. 1 is situated south of TSS Adlergrund (German territorial waters), while no. 2 is situated immediately east of (Danish waters). The Danish Maritime Authority does not consider the position of option no. 2 to be feasible and therefore recommends that option no. 1 be considered - Or alternatively a different location outside TSS Adlergrund.

Section 9.14.1.1
It is stated that TSS Adlergrund is 7.2km wide (approx. 4 nautical miles). This covers the routes in both directions; hence there is only around 2 nautical miles for eastbound and around 2 nautical miles for westbound traffic. If restriction zones of 2-3000 metres (equivalent to approx. 1.1 - 1.6 nautical miles) are created around work vessels, there will be insufficient space for other traffic. The Danish Maritime Authority therefore considers that, in connection with work in and around TSS Adlergrund, a restriction zone of no more than 1,000 metres can be imposed.

ESPOO atlas and report:
- No further remarks other than those given above, as the only remark regarding the position of the other countries' areas relates to the crossing of TSS Adlergrund.

Yours sincerely,
Flemming S. Sørensen
Nautical Consultant
Danish Maritime Authority
Safer waters
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