

## **8. Conclusions of the PEIA**

### **8.1. Evaluation of the choice of the pipeline route**

In the documents of the project, no evidence is found that the choice of alternative pipeline routes within the proposed economic activities will have a larger negative impact on flora and fauna, in particular, the elements of vegetation listed in the Red Book of the Russian Federation and the Red Book of the Leningrad Region than the route considered in the project.

Moreover, based on both the materials of the project in question and other available sources of information, the PEIA commission concludes that, on the contrary, the southern part of the Kurgalsky reserve holds natural complexes of a relatively bigger conservation value than the ones of the Soykinsky Peninsula.

In the light of the above, the conclusions of the developer stating that "a comprehensive environmental impact assessment indicates a significant priority for the Narva Bay option over the Kolganpya option, the negative impact on the environment in the case of implementation of the Narva Bay option is expected to be lower than in case of implementing the investment project under Kolganpya option (Section 1.3.2 of Volume 7.1.1.) ", are unreasonable and unreliable.

In the presented materials, practically no evaluation is given of other possible options for implementing the planned activities, in particular, of the option of passing the Kurgalsky reserve in its southern part, where the width of its onshore part does not exceed 500 m, using the trenchless method.

Analysis of the set of facts and circumstances described in sections 3, 5 and 6 of the present conclusion allows the PEIA commission to state that hiding information on comparative value of natural complexes when choosing alternatives to the pipeline route, as well as underrating the value of natural systems of the southern part of Kurgalsky reserve is a deliberate policy of the project documentation developer.

### **8.2. Evaluation of the completeness and reliability of the conducted engineering surveys**

The commission experts, basing on the results of the analysis of the engineering and environmental surveys documentation (section 5 of the conclusion), made 61 specific comments on the incompleteness and unreliability of the engineering survey materials presented in the project documentation in question (**Annex 6**).

On the basis of these specific comments, the PEIA commission concludes that in the following sections of the project documentation that represent the results of engineering and environmental surveys: volumes 1.6.10, 1.6.11, 1.6.12, 1.6.16, 1.6.17, 1.6.19, do not present complete and reliable data.

The PEIA commission notes that the incompleteness and unreliability of the engineering survey materials presented in the project makes it impossible to produce a reliable assessment of the environmental impact of the proposed activity, to form an exhaustive list of measures for the protection of natural objects and complexes, and to correctly plan such activities.

### 8.3. Evaluation of environment impact of the planned activities

The commission experts, on the basis of the project documentation analysis, made numerous specific comments on various aspects of the project documentation and on the presented project design solutions, such as:

- 52 specific comments on evaluation of completeness and reliability of the project documentation (except for information on rare and protected species) (**Annex 3**);
- 34 specific comments on evaluation of completeness and reliability of the project documentation regarding the information on rare and protected species of animals and plants that become endangered or destroyed in case of implementation of the planned activity (**Annex 4**);
- 10 specific comments on internal contradictions within the project draft (**Annex 7**);
- 22 specific comments on identified technical errors and other identified shortcomings (**Appendix 5**).

Moreover, the commission had to note in particular the revealed fact of information forgery when the developer tried to understate the fishery value of the Narva Gulf (section 6.3.2 of the conclusion).

The materials of the Nord Stream 2 project in question, due to the above-mentioned shortcomings and failures, do not provide the information necessary to evidentiate fully the scope of impact of the projected activities on the environment, as well as to assess the adequacy of the envisaged measures for the environment protection and ensuring environmental safety and compliance of the proposed activity with environmental requirements and technical regulations established by the environment protection legislation in the Russian Federation and in the Leningrad Region.

In the sections of the project related to environmental protection activities, the specific measures declared by the developer and aimed at reducing the impact on natural objects and complexes often lacks its actuation at the level of technical design solutions (for examples see Section 6.4.7, **Annex 3-23**).

The reviewed project documentation also lacks a program of production environmental monitoring and control effected during the construction and operation of the pipeline facility both offshore and onshore (see section 6.2.1).

The performed analysis of the project documentation makes the PEIA commission conclude that the implementation of the Nord Stream 2 gas pipeline project in the version proposed by the developers will inevitably lead to the destruction and loss of valuable forest and coastal ecosystems and landscapes, the protection of which the Kurgalsky reserve was established for, as well as provoke destructive processes (changes in the hydrological regime, bogging, decay and drying of spruce forests) in the areas around the planned pipeline route.

In the case of implementation of the planned activity, habitats of flora and fauna species listed in the Red Book of the Russian Federation and/or the Red Book of the Leningrad Region will inevitably be destroyed, and valuable natural complexes and species subject to protection in the territory of the reserve will be broken and extinguished.

The PEIA commission also notes that the gas pipeline route will pass near the key habitats (haulouts) of ringed seal and gray seal, the species of pinnipeds listed in the Red Book of the Russian Federation. It should be pointed out that as of today, the population of ringed seals, according to various data, reaches as little as 100 to 240 individuals and is

close to extinction. The safety of laying a gas pipeline through the habitats of pinnipeds of the Baltic is not proved by the project.

#### **8.4. Evaluation of the compliance of project documentation and project solutions with current legislation and regulations**

As shown in the materials of the present assessment (Sections 4 and 7, **Annex 8**), an attempt to implement the project under consideration will inevitably lead to a violation of the provisions of:

- the Constitution of the Russian Federation ПФ [1-1];
- four international conventions [2-1, 2-2, 2-3, 2-4];
- one Code of the Russian Federation [1-2];
- five Federal Laws [1-5, 1-6, 1-7, 1-8, 1-10];
- eight Orders and Decrees of the Government of the Russian Federation [3-3, 3-7, 3-8, 3-9, 3-10, 3-14, 3-15, 3-16];
- three documents approved by decision of the President of the Russian Federation [3-4,3-5,3-6];
- three Decrees of the Government of the Leningrad Region [6-1,6-3,6-8], and a number of norms and methods, both state and departmental [4-1, 4-3, 5-1, 5-2, 5-3, 5-4, 5-7, 5-8, 5-15].

Thus, the proposed activity contradicts the current legislation of the Russian Federation and the Leningrad Region, the objectives of creation and the regime of Kurgalsky reserve, the international obligations of Russia and the regime of Kurgalsky Peninsula wetland, and can not be deemed permissible.

#### **8.5. Conclusions on permissibility of implementation of the proposed activity**

The project in question, in the version proposed by the developer that suggests putting the pipeline route through the Kurgalsky reserve, and the technological solutions used in this process can not be brought up to the level of permissible impact on the local flora and fauna, as well as on the natural complexes of the reserve, since the planned route passes through the territory with a very high concentration of protected species of flora and fauna. Realization of the planned activity will inevitably lead to the loss of key habitats of these species, including direct destruction of thousands of plant species listed in the Red Book of the Russian Federation and / or the Red Book of the Leningrad Region. It will also lead to destruction or disruption of valuable natural complexes and landscapes the preservation of which the Kurgalsky reserve and the Kurgalsky Peninsula wetland reserve were created for.

#### **Based on the aforementioned, the PEIA commission concludes that:**

- implementation of the pipeline facility is inadmissible due to inconsistency of the documentation justifying the proposed economic activity, environmental requirements established by the legislation in the field of environmental protection, international conventions and the Constitution of the Russian Federation;

- implementation of the pipeline facility is inadmissible due the possible adverse effects of the proposed activity on the environment and the related social, economic, environmental and other consequences.

The PEIA commission concludes also that finalizing (revising) the project documentation without changing the main solutions design appears as fundamentally impossible. In particular, the commission considers fundamentally impossible to finalize the documentation provided it retains a combination of the adopted project design solutions along the pipeline route with the chosen trench technology for the passage of the gas pipeline of its onshore section.