

## Nord Stream 2 AG has confirmed presence of "additional" 4 protected plant species within the proposed route of its gas pipeline across Kurgalsky Nature Reserve, in the Leningrad Region of Russia

In its [official press-release from June 25, 2018](#) published only in Russian in Zug (Switzerland) and Saint Petersburg (Russia), the Nord Stream 2 AG, the developer of the Nord Stream-2 gas pipeline across the Baltic Sea, has **confirmed presence of so called "additional" protected plant species within the proposed route of the pipeline across Kurgalsky Nature Reserve**. Company claims that all those species “are designated as transplantable” without proper explanation of such justification.

According to the press-release, presence of the "newly discovered" plants was confirmed during pre-construction environmental monitoring, which is carried out in “close cooperation with environmental specialists, authorized authorities and taking into account the information provided by scientists and experts from the Leningrad Region”.

**Which are those species, one may wonder, and what are the grounds for them to be considered “transplantable”?** (Pictures below are kindly provided by the researchers of Komarov Botanical Institute of the Russian Academy of Sciences: Elena Glazkova, Nadezhda Liksakova, Irina Stepanchikova)



1. **Water violet or featherfoil (*Hottonia palustris* L.)**
  - Red Data Book of the Leningrad Region of the Russian Federation
  - IUCN Red List of Threatened Species
  - main threat to this plant is connected to economic developments within its habitat**



2. **Spoonleaf sundew (*Drosera intermedia* Hayne)**
  - Red Data Book of Leningrad Region of the Russian Federation
  - identified as many as over 2000 plants within the monitored area of proposed construction**
  - one of limiting factors leading to this plant's extinction is disturbance of hydrologic regimes of bogs** (very relevant for Kader Bog on Kurgalsky)



3. **Bird's-nest orchid (*Neottia nidus-avis*)**
  - Red Data Book of the Leningrad Region of the Russian Federation
  - IUCN Red List of Threatened Species
  - This orchid, being mycoheterotrophic plant, receives organic substances from symbiotic fungi associated with it.** Just this fact makes it absolutely impossible to transplant those plants



4. **Aulacomnium moss** (*Aulacomnium androgynum*)

- Red Data Book of the Russian Federation
- Red Data Book of the Leningrad Region of the Russian Federation
- This moss is highly-vulnerable to micro-climatic conditions of a specific habitat (substrate, humidity, light, plant communities, etc.), which makes it impossible to transplant
- **destruction of such habitat** at Kurgalskiy Nature Reserve will inevitable lead to a **loss of 25% (ca. 470 thousand individuals) of the local population** observed in this area, which is critical for the whole population that will be dissected into 2 parts.

The Nord Stream 2 AG claims that company's actions in case of detection of objects of biological value are regulated by an appropriate protocol developed in accordance with the requirements of the corporate policy on biodiversity conservation in case of detection of protected species during the project implementation. Permit replanting will be obtained in accordance with Russian legislation.

However, both prior to the recent findings as well as now, the experts of Komarov **Botanical Institute of the Russian Academy of Sciences have submitted** to the Russian environmental authorities their **negative statement on possibilities of re-planting of those protected species**.

Nord Stream 2 AG also claims to recognize its responsibility with respect to protected plant and animal species. The project is implemented in strict compliance with Russian legislation and international standards, including the standards of the International Finance Corporation.

Let us remind that **presence of 7 protected species of plants** (identified within proposed construction corridor, including recently "found") **has been repeatedly reported to the developer of the project by the scientific community** since the very beginning of the public consultations on the project. It has been also clearly stated in [Public Environmental Review of the project's EIA](#) (cf. p.42).

Meanwhile, the **developer preferred to ignore those notifications** before getting the environmental and construction permits, which is the **violation of both Russian environmental legislation** (precautionary principle, stated in several laws) **as well as IFC Standard 6** (Biodiversity Conservation and Sustainable Natural Resource Management – with regards to natural habitats destruction). How about other "scientific" data that was used in the project's EIA? Should we expect more "surprises"?

Given the above, **it is highly relevant that the International Union of Nature Conservation (IUCN) sends its [Advisory Mission](#) to monitor the situation with threatening the status of Kurgalsky Peninsula**, wetland of International Importance, being [listed](#) by the [Ramsar Convention](#) for its unique nature values.