

Nord Stream 2

Stakeholder Engagement Plan - Finland



Table of Contents

Abbreviations and Definitions	4
Executive summary	5
1 Brief description of the Project	7
1.1 Project Overview	7
1.2 The Nord Stream 2 Project in Finland	7
1.3 Ancillary components and activities	9
1.4 Project Schedule	10
2 Applicable Stakeholder Engagement Requirements	10
2.1 Finnish Regulatory Requirements for stakeholders engagement	10
2.2 Requirements of International Conventions	12
2.3 Performance Standards of International Financial Institutions	13
2.4 Internal Policies and Standards	14
3 Summary of key socio-economic and environmental aspects	14
3.1 Community health, safety and security	14
3.2 Munitions clearance (potential for underwater noise)	16
3.3 Biodiversity	16
3.4 Marine infrastructure and Military activities	17
3.5 Cultural heritage	18
3.6 Ecosystem services	18
3.7 Environmental long-term monitoring stations	19
4 Identification of Stakeholders	19
4.1 Overview	19
4.2 Affected Stakeholders	20
4.3 Interested Parties	23
5 Stakeholder Engagement Activities Undertaken to Date	26
5.1 EIA / Permitting phase	26
5.2 Construction phase	28
5.3 Issues raised	28
5.3.1 Grievances	29
6 Engagement plan	29
6.1 Means of Engagement	30
6.2 Information Disclosure	32

6.3	<i>Stakeholder Engagement Program</i>	35
7	Stakeholder Engagement Data Management	38
7.1	<i>Means of Receiving Stakeholders Feedback</i>	38
7.2	<i>Grievance Mechanism</i>	39
8	Resources and Implementation	41
9	Monitoring and Reporting	42
	<i>Annex 1. Summary of key Stakeholders</i>	44
	<i>Annex 2. Summary of the coordination authority statement</i>	50

Abbreviations and Definitions

Affected communities	Local communities directly affected by the Project
Aarhus Convention	Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters
AJPA	Administrative Judicial Procedure Act
COMBINE	Cooperative Monitoring in the Baltic Marine Environment
Company	Nord Stream 2 AG
Contractor	Any legal entity or physical person providing services to the Company
CWC	Concrete Weight Coating
EEZ	Exclusive Economic Zone
EIA	Environmental Impact Assessment
ELY Centre	Regional Centre for Economic Development, Transport and Environment
ESAVI	Regional State Administrative Agency for Southern Finland
Espoo Convention	Convention on Environmental Impact Assessment in a Transboundary Context, 1991
FANC	The Finnish Association for Nature Conservation
GIS	A Geographic Information System
HELCOM	Baltic Marine Environment Protection Commission - Helsinki Commission
HSE	Health, Safety and Environment
IFC	International Finance Corporation
IFI	International Financial Institutions
MoEE	Ministry of Economic Affairs and Employment
MORSE	Monitoring of Radioactive Substances
NGO	Non-governmental organization
NSP1	Nord Stream AG
NSP2	Nord Stream 2 project
Project	Nord Stream 2 main gas pipeline construction project
PS	Performance Standard(s)
Project	The Nord Stream 2 Project
SAKL	Fishermen Association
SEP	Stakeholder Engagement Plan
SLIP	Supplementary Lenders' Information Package
Stakeholders	Any individual or group who is affected by the project implementation or may have a relevant interest in, or influence over, it
SYKE	The Finnish Environment Institute
TW	Territorial Waters
UCH	Underwater Cultural Heritage
UXO	Unexploded Munitions
WP	Water Permit

Executive summary

Background to the Nord Stream 2 Project

The Nord Stream 2 Project (the “Project”) comprises the planning, construction and operation of a new strategic twin subsea pipeline (the “Pipeline”) that will connect European consumers with Russian gas fields. The Project will have the capacity to supply 55 billion m³ of natural gas per year. The Pipeline has a planned length of 1230 km from Russia to Germany via the Exclusive Economic Zone (EEZ) and/or Territorial Waters of Russia, Finland, Sweden, Denmark and Germany (the “Project Countries”) in the Baltic Sea. The design, construction, and subsequent operation of the pipeline are managed by Nord Stream 2 AG (the “Company”), which has been specifically established for this purpose.

Nord Stream 2 AG recognizes the importance of stakeholder engagement in building strong, constructive, and responsive relationships that are essential for the successful management of the Project’s environmental and social impacts. The objective of the Company’s stakeholder engagement process is to disclose information about the Project while also giving stakeholders the opportunity to provide their opinions and identify any concerns. The opinions/concerns submitted during the consultation process will be taken into account in the preparation and review of the Project’s environmental and social management plans, and during the development of the design of the Project.

Nord Stream 2 AG Approach to Stakeholder Engagement

The Company is implementing a stakeholder engagement process across the entire Nord Stream 2 Project, managed through a suite of country-specific SEPs applicable to each Project Country. The SEPs have been developed in a consistent manner in line with the requirements of the International Finance Corporation (IFC) Performance Standards (PS), while at the same time ensuring that country-specific regulatory requirements are met. The stakeholder engagement process commenced at the early stages of the Project development and will continue in an evolving manner through the entire Project lifecycle. To reflect this evolving process, the SEPs are “living” documents that will be updated as necessary throughout the Project lifecycle.

While the IFC PS requirements for environmental and social assessment and management are broadly aligned with the national EIA requirements in the five Project Countries, some differences exist requiring the development of additional assessments and plans (for example, in relation to cumulative impacts, ecosystem services and social impacts) in order for the Project to demonstrate compliance with the IFC PS.

Further updates of the SEPs will also be required as the Project evolves through construction, operation and decommissioning.

Personnel of the Project and contracting organizations are not considered within this plan. These are managed through the environmental and social management plan for the Project, as well as other procedural documents.

Stakeholder Engagement in Finland

This SEP applies to the Project components located within the jurisdiction of Finland and covers the planning, construction and operation of the Project activities and specifically:

- The planning, construction, operation and decommissioning of all Project related activities- as defined in Section 1.2
- All activities at third-party facilities (i.e. *ancillary facilities*) that are under the direct control of the Project as described in Section 1.3

Decommissioning activities will take place at the end of the operation of the pipeline system and it is currently not possible to anticipate what methods may have to be employed. Therefore, it cannot be anticipated what risks could be associated with these activities at the moment and what engagement activities may consequently be required. An environmental assessment of the decommissioning activities, and an update of the engagement plan, if warranted, will be prepared ahead of the planned end of the pipeline operation, in accordance with the prevailing legal requirements at such time.

The structure of this Finland SEP is as follows:

- Section 1 contains a brief description of the Project within the Finnish jurisdiction and its operations including design elements and potential environmental and social issues.
- Section 2 contains a summary of the applicable major national and international legal requirements.
- Section 3 describes summary of key socio-economic and environmental aspects
- Section 4 presents an overview of the identification of stakeholders.
- Section 5 presents a brief account of stakeholder engagement activities carried out to date.
- Section 6 contains an account of planned stakeholder engagement activities.
- Section 7 presents information on stakeholder engagement data management.
- Section 8 contains information on how the Company manages the implementation of SEP and stakeholder engagement in terms of personnel/resources.
- Section 9 presents information on monitoring and reporting.

1 Brief description of the Project

1.1 Project Overview

The Project comprises the construction of a twin subsea pipeline for the export of 55 billion m³ of natural gas per year from Russia via the Baltic Sea to a landfall at Lubmin in the German state of Mecklenburg-West Pomerania. The Project is based on the successful practice of construction and operation of the existing Nord Stream Project (NSP1). The overall route of the Nord Stream 2 Pipeline is shown in Figure 1 below.



Figure 1 Overview of the Nord Stream 2 Pipeline Route

The components of the Nord Stream 2 Project within Finnish jurisdiction are described below.

1.2 The Nord Stream 2 Project in Finland

In the Finnish EEZ, the pipeline route that NSP2 has applied and has the permit for, crosses the existing NSP1 pipelines immediately after entering the Finnish sector. The subsequent route lies north of the NSP1 pipelines. The length of the route in the Finnish sector is approximately 374 km (Figure 2), with water depths along the route being between 34 m and 184 m.

The NSP2 pipeline route is located entirely in the Finnish EEZ and does not enter Finnish territorial waters. To the east the route continues to the Russian territorial waters and to the west to the Swedish EEZ. The closest distance to Finnish territorial waters is 0.6 km and the closest distance to the Estonian EEZ 1.8 km. The minimum distance of the NSP2 pipelines

from the Finnish coastline is approximately 19 km and from Estonian coastline approximately 25 km. The distance to NSP1 pipelines varies from 0.2 to 4.2 km (excluding the crossing).

Nord Stream 2 AG, based on the surveys conducted for the EIA Report and the negotiations held with different authorities, and other stakeholders, decided to proceed with the southern route alternatives. In its statement on 27th August 2017 the EIA coordinating authority preferred the southern alternatives as the impacts are significantly smaller compared to the northern alternatives. The choice of the southern alternatives reduced the total length of the pipeline routes in the Finnish EEZ.

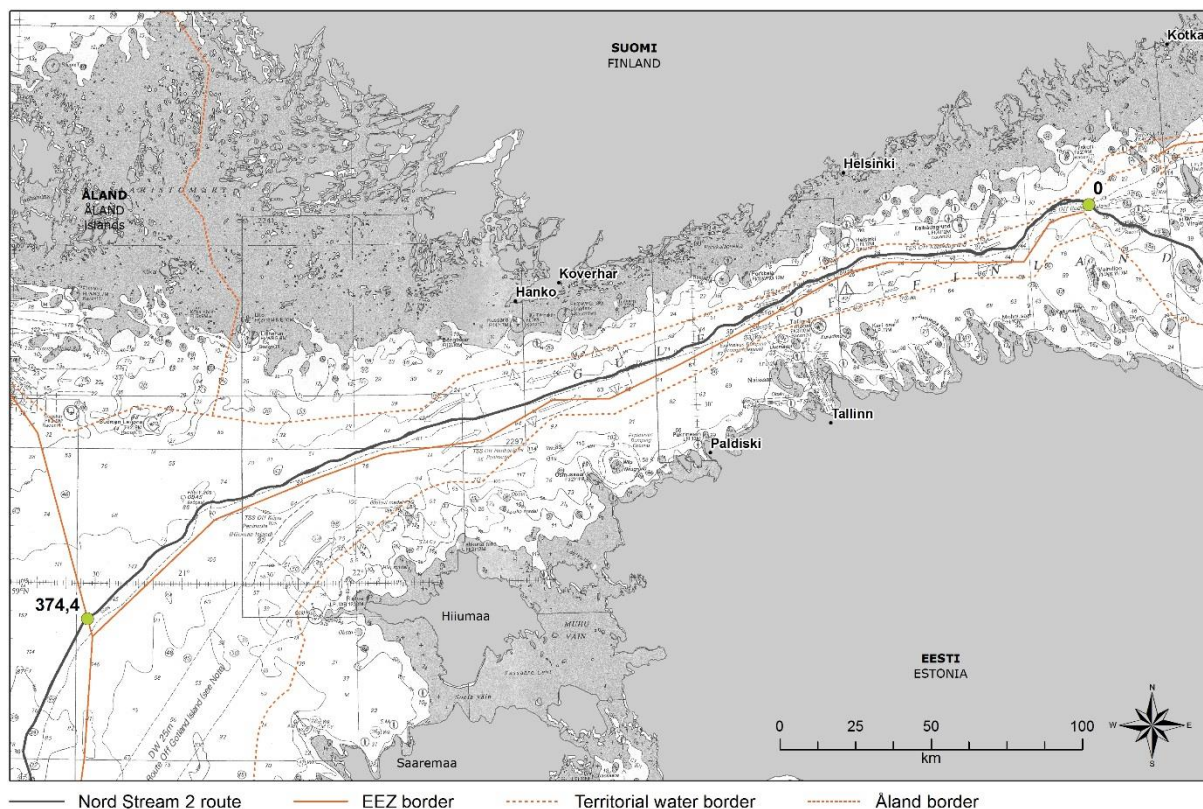


Figure 2: Routing in Finland

Construction activities started in Finland at the end of April 2018 with rock placement and, shortly after, with munitions clearance (the later was completed in June 2018). Construction of crossing installations started in July 2018. Pipelay started in Finland in September 2018 with the installation of Line A; installation of Line B is scheduled to start in 2019. Both lines are planned to be finalised by the end of 2019, after which the pipelines are planned to be taken into operation.

The pipe lay follows a conventional process where the individual (or multiple) pipe joints are welded into a continuous pipe string on board the lay vessel and then lowered to the seabed. Approximately 300 days of pipe-laying operations will be carried out in the Finnish EEZ assuming an average lay rate of 3.4 km per day.

The Company will be the owner and operator of the offshore pipeline system. The Nord Stream 2 pipeline system will be monitored and controlled remotely, from the main control centre in Zug, Switzerland or, if the latter is unavailable, from a backup control centre.

Planned maintenance and scheduled inspections will be carried out in accordance with statutory requirements and good international industry practice. Any large-scale maintenance activities will be performed during a yearly shutdown in non-winter months.

1.3 Ancillary components and activities

In addition to the offshore construction activities, an existing concrete weight coating plant is used at Mussalo harbour, at the Port of HaminaKotka in Kotka (this facility was previously used for concrete weight coating of the pipes for the construction of NSP1). Other existing facilities/activities at Mussalo harbour that are used during the construction phase will include:

- Pipe storage yards
- Interim storage of rock (for use as rock placement material)

The ancillary components in Kotka are shown in Figure 3.



Figure 3 Project ancillary components in Kotka

Existing yards at Port of Hanko's Koverhar will also be used as an interim pipe storage yard. Concrete coated pipes are shipped from Kotka to Hanko. Nord Stream 2's Coating and Logistics Contractor Wasco is responsible for running the coating, logistics and storage operations in Kotka and storage operations in Hanko.

Nord Stream 2 AG has awarded the rock placement contract to JV Boskalis – Van Oord. The company will supply rock from a local subcontractor, Rudus Oy, who is conducting the rock quarry work. Rajavuori quarry in Kotka and the Inkoo quarry in Inkoo are used in Finland. Rock placement is carried out by designated fall-pipe vessels.

1.4 Project Schedule

The Project will be implemented in accordance with the following preliminary schedule:

- engineering and design – from end 2015 to early 2018
- EIA / Construction permit acquisitions - 2018
- construction - 2018-2019
- commissioning - end of 2019
- operation – 2020 onward (anticipated operating life of at least 50 years)
- decommissioning – end of operational life

2 Applicable Stakeholder Engagement Requirements

The stakeholder engagement activities provided for in this SEP are being conducted in accordance with:

- National regulatory requirements;
- Requirements of the international conventions;
- Standards and guidelines of the International Finance Corporation (IFC).

2.1 Finnish Regulatory Requirements for stakeholders engagement

EIA procedure. In Finland, the EIA procedure provides government authorities and other stakeholders with various ways to participate in the procedure. The Finnish EIA procedure was completed on 27/07/2017, after the coordinating authority, Uusimaa ELY Centre, responsible for the national procedure in Finland, provided its statement on the EIA report of the Finnish section of the planned Nord Stream 2 natural gas pipelines through the Baltic Sea. The coordinating authority's statement was taken into account in the Finnish permitting procedure.

The EIA procedure had two main phases:

- An EIA programme phase, and

- An Assessment Phase.

The coordinating authority provided information about the assessment programme in the first phase and the assessment report in the second phase by posting a public announcement on the notice boards of local authorities in the project's probable area of impact for at least 14 days, as provided in the Act on Public Announcements (34/1925). A public announcement had been published in electronic form and in at least one widely read newspaper in the project's area of impact.

The coordinating authority also ensured that opinions and comments were requested on the assessment report and provided an opportunity for opinions to be expressed. The coordinating authority provided the municipalities in the project's area of impact with an opportunity to express their opinion on the assessment programme. Consultations were arranged during this statement period. Opinions and statements were lodged with the coordinating authority within the period stated in the announcement. The assessment procedure was concluded on 27/07/2017, when the coordinating authority handed over its statement and other statements and opinions to the developer. The coordinating authority's statement was supplied, also, for information purposes to authorities dealing with the project, the municipalities in the project's area of impact and, as necessary, to regional councils and other appropriate authorities. The coordinating authority's statements has been taken into consideration in the permit application.

Social impacts were assessed in the EIA procedure taking into account the national guidelines for social impact assessment (Ministry of Social Affairs and Health 1999, National Institute for Health and Welfare 2011).

EEZ permit procedure. Activities in the Finnish EEZ are governed mainly by the Finnish Act on the Exclusive Economic Zone (EEZ Act) and the Decree on the Exclusive Economic Zone (EEZ Decree). Pursuant to the EEZ Act, the Council of State may grant consent for economic exploitation of the Finnish EEZ (EEZ permit). The formal requirements for the application, as listed in the EEZ Decree, include description of nature and objectives of the activities and of the methods as well as the precise geographical areas where the activities are to be located and the commencement date and duration of the activities.

Additionally, the general administrative legislation concerning decision making procedures in government authorities in Finland is the Administrative Judicial Procedure Act (AJPA). The AJPA contains among others, the procedural requirements for the decision making authority to hear parties that may be impacted by an application prior to making a decision.

The EEZ permit application has to be submitted to the MoEE at least six months before the planned date of starting of the activities. After its submission, the application should be checked for completeness by the MoEE. Once the application has been submitted, it and most of the appendices become public information, meaning that any private person or media outlet can request the right to view the application and the appendices and to receive a free copy of them.

Once the application has been made ready for hearing, it is sent out by the MoEE for a public and authority hearing (generally 30 days long, however longer hearing periods are not uncommon).

Once the MoEE has received statements from the other authorities and the public, it evaluates the need for additional information and may request additional information from the applicant. If no additional information is requested, the decision making stage takes 2-3 months. The actual decision on the matter is made by the Council of State. The permit decision can be appealed to the Supreme Administrative Court.

Water permit procedure. The impacts of a project that trigger the need for a water permit are listed in the New Water Act. A water permit is required if the activity may cause changes to the water area, resulting in certain harmful impacts. These activities include the laying, construction, use and maintenance of a pipeline. Also the clearance of munitions is subject to a water permit. The Water Decree describes in detail what the content of the Water Permit application should contain.

The water permit application is submitted to ESAVI. After its submission, the application should be checked for completeness by ESAVI. Once the application has been submitted, it and most of the appendices becomes public information. This means that any private person or media outlet can request the right to view the application and the appendices and receive free copies of them.

Once the application is ready for a hearing, it is sent out by ESAVI for a public and authority hearing that last from 30 to 45 days. The notice that the application is pending and information on how to submit a statement will be available in the municipalities that are adjacent to the relevant area of the Finnish EEZ as well as in the Official Gazette.

Once ESAVI has received statements from the authorities and public, it evaluates the need for additional information and may request additional information from the applicant. At this time, ESAVI requested a statement from Nord Stream 2 regarding the statements made on the application.

Before issuing a decision, and if these have not happened at an earlier stage, ESAVI may wait for the post EIA Report consultation and for the end of the Espoo Process. Once the decision has been made, a thirty day appeal period begins. If the decision is granted with immediate enforcement, the construction work may be commenced once the required security has been duly lodged.

The water permit decision can be appealed to Administrative Court in Vaasa and thereafter to the Supreme Administrative Court. The decision by the Administrative Court of Vaasa becomes enforceable, unless otherwise decided by the Supreme Administrative Court.

Nord Stream 2 AG submitted the EEZ and Water permit applications in September 2017 and has received both permits in April 2018. The EEZ permit became legally binding on 12 July 2018.

2.2 Requirements of International Conventions

The planned gas pipeline route crosses the exclusive economic zones of four countries: Finland, Sweden, Denmark, and Germany, as well as the territorial waters of Russia, Germany, and Denmark (base case route).

Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention). The Espoo Convention promotes international cooperation and participation of the public when the environmental impact of a planned activity is expected to cross a border. It sets out the rights and duties of countries in assessing the likely environmental impact of a proposed activity. The Espoo procedure for the Project ran broadly in parallel to all the national EIA procedures.

Finland and Estonia have signed a bilateral agreement on transboundary EIA (Agreement between the Government of the Republic of Estonia and the Government of the Republic of Finland on Environmental Impact Assessment in a Transboundary Context, SopS 51/2002), where the principles of the Espoo Convention have been defined. There is a joint commission on EIA in a transboundary context for the implementation of the provisions of this bilateral agreement. The commission convenes at least once a year and also as necessary.

Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention). The Convention regulates access to, time periods and form of distribution of information, as well as participation of the public in decision-making processes.

2.3 Performance Standards of International Financial Institutions

The IFC Performance Standards (revised in 2012) are internationally recognised standards on social and environmental sustainability, applied by the IFC (the private sector arm of the World Bank Group) and by a number of large commercial banks and Export Credit Agencies within the framework of the Equator Principles. Of particular relevance to the stakeholder engagement process is Performance Standard 1: "Assessment and Management of Environmental and Social Risks and Impacts".

The key requirements of PS 1 pertaining to public engagement are the following:

- Identify and evaluate environmental and social risks and impacts of the project;
- Adopt a mitigation hierarchy to anticipate and avoid, or where avoidance is not possible, minimise; and where residual impacts remain, compensate/offset risks and impacts to workers, affected communities and environment;
- Promote improved environmental and social performance through effective use of management systems;
- Ensure grievances from affected individuals, groups, and communities and external communication from other stakeholders are responded to and appropriately managed; and
- Promote and provide means for adequate engagement with affected communities throughout the project cycle on issues that could potentially affect them and ensure relevant environmental and social information is disclosed and disseminated.

Equator Principles III requirements applicable to public engagement are essentially contained in Principles 5 (Stakeholder Engagement), 6 (Grievance Management) and 10 (Reporting and Transparency), and in IFC Performance Standards 1 and 7 (2012), to which the EPIII make an explicit reference. Public involvement is to be considered an essential part

of any business venture and a way to improve project quality and delivery. Equator Principles requirements concerning public consultation are similar to IFC requirements.

2.4 Internal Policies and Standards

In accordance with the system of environmental and social management of Nord Stream 2, procedures and policies have been developed and implemented, which, among others, reflect the Stakeholder Engagement management process.

3 Summary of key socio-economic and environmental aspects

The engagement plan is based on the environmental and social aspects associated with the project and the potential risks to the environment and communities.

The potential socio-economic and environmental issues associated with the proposed Project in Finnish jurisdiction have been identified through the assessments undertaken to date, including documents being prepared as part of the Finnish permitting process for the Project). In addition, comments received to the EIA Report have also been considered.

3.1 Community health, safety and security

Community impacts are mostly associated with ancillary activities. In particular such impacts could be caused by noise, traffic and operation of concrete weight coating plant at Mussalo harbour, at the Port of Hamina Kotka in Kotka.

The City of Kotka is located on the coast of the Gulf of Finland on the delta of the River Kymijoki. Kotka is part of the Kymenlaakso Region located in southern Finland. Kotka is located 130 km east from Helsinki and 290 km west from St. Petersburg; the main E18 Highway runs through Kotka. The city centre of Kotka is located on Kotkansaari Island. The other centre is Karhula. Kotka has a population of about 55,000 and covers an area of 950 km² of which 678 km² is water. The population density is 202 inhabitants per km².

Mussalo Island is characterised by a harbour and an industrial area and the coastline of Mussalo. Mussalo Harbour is the newest port in the Port of Hamina Kotka, which is by far the largest general port in Finland. The total population of Mussalo Island at the end of 2013 was 3,639. Next to the port area are the industrial and logistics areas of Hanskinmaa and Palaslahti. The CWC plant is situated in the middle of the Palaslahti industrial and logistics area.

Hirssaari Island, located between Mussalo and Kotkansaari Islands along Road 355, has a population of 907 with residential areas located along the road on both sides. The nearest residential area, Ristniemi, is situated about 0.3 kilometres from the operations at Jämskä quay and 0.8 kilometres from the CWC plant. The nearest summer cottages are located also in Ristniemi about 0.4 kilometres from Jämskä quay and 0.8 kilometres from the CWC plant. Mussalo elementary school is located 1 kilometre from Road 355 and 2 kilometres from the CWC plant. The nearest kindergarten is located 0.3 kilometres from Road 355 and 1.9 kilometres from the CWC plant. A hospice for disabled youth is located in Etukylä 1.2 kilometres from Road 355 and 2.5 kilometres from the CWC plant.

Residential areas, Hovinsaari Power Plant (157 MW) belonging to Kotka Energia and the sweetener manufacturing facility of Danisco are situated on the western side of Road 15 (Hyväntuulentie) along the rock transport route. Also, the Central Hospital of Kymenlaakso is situated nearby.

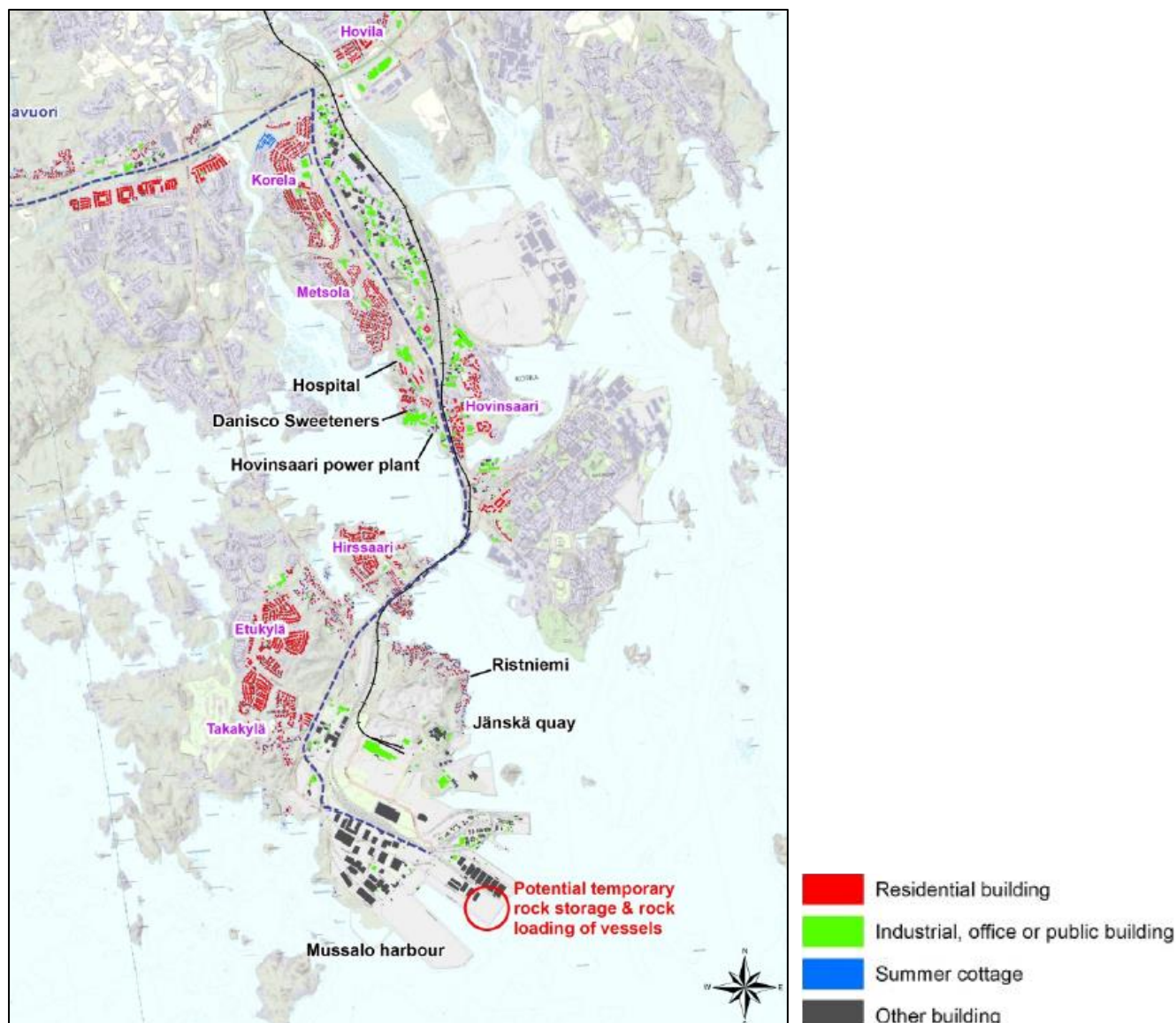


Figure 4 Potential Project Affected Communities of the City of Kotka

The City of Hanko. Port of Koverhar is situated 15 kilometres from the city centre. The closest residential area to Koverhar is a village, Lappohja, approximately 2.5 kilometres northeast from Koverhar. Syndalen, an area used for military exercises, including firing ammunition, is located south of Koverhar industrial area and the harbour. A few residential homes are located on the other side of the military area, approximately 2 kilometres south of Koverhar. Nearby islands such as Ekö, Hermansö and Koö accommodate mainly holiday homes with the nearest being approximately 2 kilometres away. The closest residential area to Koverhar is Lappohja

village with approximately 700 inhabitants and about 2.5 kilometres northeast of Koverhar. The village has an elementary school, kindergarten and a course centre, which is located on the seashore. Currently, economic activities in the area of Koverhar are low.

Military activities in Koverhar and Syndalen areas are a source of noise.

Related to the project operations in Koverhar, road traffic consists only of passenger traffic, as majority of the pipes are transported by vessels. Rest of the pipes, that is 16,700, are transported to port of Koverhar by rail from Russia. A road network serves the harbour.

Project related activities create positive social impacts in forms of employment and additional business for the local companies especially in logistics hubs Kotka and Hanko. In Kotka, the Contractor's coating and logistics activities created up to 400 direct and at least 100 indirect jobs during the peak production time, and up to 100 direct and indirect jobs in Hanko.

3.2 Munitions clearance (potential for underwater noise).

The Engineering Contractor, Saipem, have identified UXOs that needed to be cleared based on the detailed UXO surveys. Clearance of munitions is a permitted activity within the Water permit application. Underwater noise generated by detonation of UXO can impact on marine fauna, including harbour porpoise, ringed seal and grey seals. Impacts have been monitored during clearance operation, and preliminary results show that impacts are not larger than minor, in line with what presented in the permit application.

With regards to impacts from underwater noise in the Kallbadan protected area, preliminary monitoring results presented to the authorities in the 2nd and 3rd Quarterly report show that measured risk area for permanent hearing damage for marine mammals was significantly smaller than assessed in the permit applications. In addition, preliminary results from video monitoring carried out by Metsähallitus showed that that munition clearance did not influence grey seal occurrence and behavior in Kallbådan Seal Reserve.

3.3 Biodiversity

The pipeline route does not cross any protected areas in the Finnish EEZ. However, the following Natura 2000 sites lie within the potential area of influence of the pipeline: (i) 1.8 km from the Sandkallan site (which includes the presence of reefs); and (ii) 9.8 km from the Kallbådan Islets and Waters site (which includes the presence of grey seals, which could have been affected by underwater noise generated during construction activities including munitions detonation - see above).

The Forestry authority Metsähallitus, expressed concern for the potential impacts related mainly to munition clearance activities that could affect different protected areas. These concerns were addressed in proper Natura Assessments and Natura Screenings that are part of the Water Permit Application.

Proper Natura Assessments have been carried out for both the Sandkallan Natura site and the Kallbådan Islets and Waters Natura site and submitted to the ELY Centre in early July 2017. Both Natura Assessments confirmed that the planned Nord Stream 2 project, either individually or in combination with other projects and plans, will not significantly deteriorate the nature values due to which both sites were included in the Natura network.

Additionally, Natura Screening Assessments have been carried out for four Natura sites:

- Söderskär and Långören Archipelago (12.5 km from the NSP2 route);
- Pernaja Bay and Pernaja Archipelago Marine Protection Areas (13.1 km);
- Tammisaari and Hanko Archipelago and Pohjanpitäjänlahti Marine Protected Area (17.8 km);
- Eastern Gulf of Finland Archipelago and Waters (23.5 km) Natura sites.

Also for these sites, Natura Assessment Screenings confirmed that the planned Nord Stream 2 project, either individually or in combination with other projects and plans, will not significantly deteriorate the nature values due to which both sites were included in the Natura network. The Natura Assessment Screening did not bring up issues necessitating a Natura 2000 assessment (Appropriate Assessment) under section 65 of the Nature Conservation Act.

There are no Natura 2000 areas in the immediate vicinity of Mussalo Harbour, the industrial site or the area through which the rock transport will take place. The sea conservation area and Natura 2000 areas of Tammisaari and Hanko Archipelago and Pohjanpitäjänlahti are located in the immediate vicinity of Koverhar Harbour.

General concern for the potential impacts on the environment due to the construction of the project was raised in some comments to the EIA Report. These concerns are addressed in detail in the Water Permit Application.

3.4 Marine infrastructure and Military activities

The project construction activities and ultimately the physical location of the pipeline system will overlap with shipping lanes. There are five major port areas in Finland which create ship traffic within the project area as follows:

- The archipelago area (Naantali, Turku, several small ports and crossing traffic from the
- Bay of Bothnia;
- The Hanko area (Hanko, Inkoo and several small ports);
- The Helsinki area (Western Harbour, Vuosaari, and several small ports);
- The Sköldvik area (Oil refinery and Tolkkinen);
- The Kotka area (Kotka, Hamina, Loviisa).

The Balticconnector is a planned natural gas pipeline connection between Inkoo in Finland and Paldiski in Estonia. The purpose of the pipeline project is to interconnect the Finnish and Estonian natural gas distribution networks. According to preliminary plans, construction and pipeline installation will take place between 2018 and 2020 and commissioning is expected late 2020. The planned route of the Baltic connector pipeline crosses the NSP2 pipeline route south of Inkoo.

Several power and telecommunications cables are present in the Finnish project area. Twenty-nine existing cables (including cables of unknown owners) and two planned cables cross the pipeline route.

The proposed NSP2 route crosses the existing NSP1 pipelines immediately after entering the Finnish EEZ.

The pipeline route does not go through any of the military restricted areas. The restricted areas do not limit movement within the area, except for movement in the proximity of marked military targets located within the restricted area.

3.5 Cultural heritage

Two phases of archaeological surveys have identified/evaluated several sites of cultural historical interest in the Finnish EEZ. In total four Underwater Cultural Heritage (UHC) sites have been identified within ± 250 m of the proposed pipeline route. Two of these are significant sites that are over 100 years old (an 18th century merchantman and late 18th / early 19th century cannon barge), one is the anti-submarine net “Walross” installed during WWII and one is a wreck from WWII. These have been assessed in detail and non-significant UHC sites have been omitted from further consideration. Mitigation procedures for such objects have been made in consultation with the national authorities and include minor route changes to avoid the objects and implementation of exclusion zones to protect the objects. A chance finds procedure will also be used to manage the identification and preservation of cultural heritage chance finds.

City of Kotka. Kymijoen Laakso (Kymijoki River Valley) is a nationally important landscape. The valley is 18,000 hectares in area and located in the areas of Anjalankoski, Elimäki, Kotka, Kuusankoski, Pyhtää and Valkeala. Kymijoen Laakso is a diverse and cultural-historically stratified landscape. In Langinkoski, there is an imperial fishing lodge from the 19th century. The landscape of Kyminkartano is a nationally important cultural heritage site on the bank of Kymijoki River dating back to the Middle Ages. Munkholma is an island in Kymijoki River with a chapel from the 1790s.

3.6 Ecosystem services

Based on social surveys in Finland and in Estonia, the majority of people consider the environmental status of the Gulf of Finland as a very important element of the landscape/scenery. The value of the Gulf of Finland in terms of tourism, recreational use and commercial fishing was also considered important, although less important than its value in terms of environmental status or landscape/scenery.

The register of commercial fishermen in Finland includes 1,153 fishermen who operate in the sea area bordering the Gulf of Finland. Following social surveys for fishermen, a quarter (25%) of them earned at least 30% of their income from fishing. The number of commercial fishermen was highest in southwest Finland. Commercial fisheries in the Gulf of Finland and in the Northern Baltic Proper includes both coastal and offshore fishing. There is the potential for cumulative impacts from the presence of the Nord Stream 2 pipeline and the NSP1 pipeline on trawl fishing. During pipeline construction and maintenance activities temporary safety exclusion zones will also be set-up around the Project vessels that may interrupt fishing activities.

Additional impacts may be associated with the temporary inability for members of the public to use water resources for recreational purposes.

Nord Stream 2 intends to mitigate adverse environmental and social impacts originating from the construction and operation of pipelines, including impacts related to fisheries. Dedicated Fisheries Livelihood Plan was developed and implemented by NSP2 in accordance with the good practice of International Finance Corporation.

City of Kotka. There are numerous islands in the Eastern Gulf of Finland National Park that have historic value and are used for recreational purposes. Leisure fishing in Kotka is practiced in Kymijoki and its rapids, but also in the sea areas. Marinas located closest to Mussalo Harbour and Palaslahti Industrial Area are on Santalahti, Hirssaari and on Kotkansaari.

City of Hanko. Hanko offers good surroundings for boating and sailing as well as for other maritime leisure activities. The Eastern Harbour (Itäsatama) with 400 moorings is the largest marina in Finland located around 15 kilometres from Koverhar. The annual Hanko Regatta is one of the largest sailing events in Finland with around 200 boats competing.

3.7 Environmental long-term monitoring stations

Most of the long-term stations are managed by the Finnish Environment Institute (SYKE) and are part of the HELCOM monitoring programme (COMBINE - Cooperative Monitoring in the Baltic Marine Environment, and MORSE - Monitoring of Radioactive Substances). According to information received from SYKE and other data sources, there are 16 long-term monitoring stations located within 5 km distance from the pipeline route. Four of them are located within 1 km of the pipeline route. In the Finnish EEZ, there are also long-term stations managed by Estonia or Sweden.

4 Identification of Stakeholders

4.1 Overview

Stakeholders are identified as individuals, groups, or organizations who:

- May be directly or indirectly, positively or negatively impacted by the Project;
- May be interested in the Project, have environmental and social interests that may be impacted in the course of the Project, or may potentially influence Project decision-making and implementation in certain ways.

The Project stakeholders may be identified at a local, regional, national and international level.

In order to ensure an efficient and targeted Stakeholder Engagement process within the framework of Nord Stream 2 in Finland, and in compliance with the requirements of international standards, the following classification has been introduced:

- **Affected stakeholders:** individuals, groups and organizations directly influenced by the Project (actually or potentially, positively or negatively). Affected stakeholders include vulnerable groups: individuals that may be disproportionately impacted by the Project or eventually find themselves in a disadvantaged position in comparison with other public groups due to their vulnerable position. Interaction with these groups may demand

additional efforts to ensure that such groups have equal representation during consultations and in the decision-making process.

- Interested parties: individuals, groups and organizations who are not necessarily directly affected by the Project but believe that the Project may somehow affect their interests and/or are capable of influencing the Project in any way.
- Parties that may be affected by transboundary impact. According to the Espoo Convention, these include:
 - 'Party of origin' means the Contracting Party or Parties to this Convention under whose jurisdiction a proposed activity is envisaged to take place.
 - 'Affected party' means the Contracting Party or Parties to this Convention likely to be affected by the transboundary impact of a proposed activity. For the Nord Stream 2 Project the affected parties consist of Russia, Estonia, Latvia, Lithuania, Poland, Sweden, Denmark, and Germany.

Stakeholder identification has been made by NSP2, firstly, through the consideration of the potential stakeholder relevant to each of the key Project socio-economic and environmental issues described in Section 3. Secondly, stakeholders have been identified based on the experiences of the first Nord Stream project and during the project extension phase. Thirdly, stakeholders are being identified, taking into account the to-date engagement process. NSP2 in Finland received statements to the EIA Report from state authorities, regional authorities, city/municipality authorities, NGOs, private person, companies and associations. These stakeholders were also included among either affected parties or interested parties, as relevant, in the list of stakeholders.

Stakeholders are identified through consideration of both groups/individuals that may be influenced by the Project and those that may influence the Project. Prioritization is generally given to Project Affected stakeholders. The stakeholder list is reviewed periodically and updated as necessary through the lifecycle of the Project to reflect new information and the evolving status of the Project.

The categories of stakeholders at the local, regional, national and international levels is summarised in Attachment 2, broken down by Interested parties, Affected Stakeholders.

4.2 Affected Stakeholders

The stakeholders have been identified based on the experience from the Nord Stream Project, experience from the scoping phase of Nord Stream 2, discussions with authorities and other stakeholders and contacts by parties interested in the Project. The main identification method is based on a conservative estimate of the impact area of the project and the stakeholders within this area and the southern coastal municipalities

Following groups of Affected Stakeholders were identified:

- Cable owners,
- Fishing companies and fishermen association
- Local authorities
- Local community, incl. vulnerable groups

- Commercial enterprises
- Cultural organisations

The identification of Affected Stakeholders through consideration of each of the relevant key socio-economic and environmental issues is presented in Table 1.

Table 1 Identification of Affected Stakeholders

Socio-economic / environmental aspect	Affected Stakeholders
Community Health, Safety, Security	<p>Local communities as identified in Section 3.1, incl. summer cottages owners, residents of Etukylä, Koverhar and Lappohja, owners and users of the military area of Syndalen, residents of Ekö, Hermansö and Koö, residents of the City of Kotka, living along the rock transportation route.</p> <p>Local authorities:</p> <ul style="list-style-type: none"> • authorities of the City of Kotka • authorities of the City of Hanko <p>Vulnerable groups:</p> <ul style="list-style-type: none"> • Mussalo elementary school • Four kindergartens in Mussalo • A Mussalo hospice for disabled youth <p>Medical facility:</p> <ul style="list-style-type: none"> • Central Hospital of Kymenlaakso <p>Ports:</p> <ul style="list-style-type: none"> • Port of Hanko • Port of HaminaKotka <p>Commercial enterprise:</p> <ul style="list-style-type: none"> • Hovinsaari Power Plant • Danisco • Cursor Oy • Kotka-Hamina Regional Development Company
Ecosystem services access	<ul style="list-style-type: none"> • SAKL (Fishermen association) • Kalatalouden keskusliitto ("Central Union of Fisheries") • The Itäsatama marina • Hanko Regatta's participants • Marinas in Santalahti, Hirssaari and on Kotkansaari • Boating clubs • Kotka Maritime Festival

Socio-economic / environmental aspect	Affected Stakeholders
Biodiversity	<ul style="list-style-type: none"> Metsähallitus (Forestry authority) as the owner of the Natura 2000 sites
Cultural heritage	Local communities of the City of Kotka, as identified in Section 3.1.
Marine infrastructure and Military activities	Shipping companies are required to be familiar with the contents of the Notice to Mariners for the waterways they pass through.
Munitions clearance	<p>Responsible authority will be informed by Nord Stream 2 AG: Finnish transport agency, Defence Forces, Border Guard</p> <p>7 existing power and communication cable owners and 2 planned cable owners</p> <p>Pipeline operators (Nord Stream) and Baltic connector (planned)</p>
Environmental monitoring stations and protected areas	SYKE,

The Finnish EIA Act requires that the views of Stakeholders may be affected by the project, are heard. In particular, affected parties (authorities, companies and associations) that were informed on the project and provided statements to the EIA Report were:

- State authorities
 - Forestry Authority (Metsähallitus)
 - Finnish Environmental Institute (SYKE)
- City/municipality authorities:
 - City of Kotka
- Companies:
 - Elisa Oy (cable owner)
- Associations:
 - Kalatalouden keskusliitto ("Central Union of Fisheries")
 - Suomen ammattikalastajaliitto ry, SAKL ("Union for Finnish Commercial Fishermen")

The Project considers representatives of neighbouring Baltic States as potential affected parties and they are addressed under the Espoo procedure.

Vulnerable groups. Participation of vulnerable individuals in consultations and discussions held by the Company is an important factor of success to ensure maximum engagement of the public in cooperation. Vulnerable groups in the scope area of the Project may be, among others, presented by the following groups of population:

- children
- people with disabilities and their caregivers;

Engagement with these groups will be conducted in coordination with local authority and community leaders, if necessary.

4.3 Interested Parties

Interested parties include groups that are not directly affected by the Project, including the following (see Attachment 2 for further details of specific Interested Parties identified):

- Government stakeholders: regional and federal authorities for permitting, environmental management and protection (including water resources, forestry, hydrometeorology, and subsoil management), for consumer rights and wellbeing protection, technical supervision, emergency recovery, social protection, employment, and cultural heritage.

Governmental Stakeholders include authorities, responsible for Project permits and identified following legal requirements:

Federal Authorities

- Council of State
- Ministry of Economic Affairs and Employment
- Finnish Safety and Chemicals Agency (Tukes)

Regional Authorities

- Centre for Economic Development, Transport and the Environment (ELY Centre), Uusimaa, Southwest and Southeast
- Regional State Administrative Agency for Southern Finland (ESAVI)

Other authorities will be informed on Project matters as appropriate following legislative requirements. Detailed list is included in the Attachment 2.

- Convention Officials participation: Finnish focal point representatives in international conventions; affected countries representatives in international conventions.
- Public organizations:
 - regional, national and international non-governmental organisations aimed at protecting environmental, social and economic interests of the population and the rights of Indigenous peoples.
 - cultural organizations; scientific and research organizations and laboratories, and educational institutions: schools, universities, academies;
 - public organizations and representatives of the countries that may be under transboundary impact during the Project as per the Espoo convention;

- Mass media and the initiative groups related to them, including local, regional, and national printed and broadcasting mass media, social media.

The identification of interested parties through consideration of each of the relevant key socio-economic and environmental issues is presented in Table 2.

Table 2 Identification of Interested parties

Socio-economic / environmental aspect	Interested parties
Biodiversity and Environment	<ul style="list-style-type: none"> • Permitting authorities • Convention officials: HELCOM • NGOs: FANC, Greenpeace Finland, WWF Finland, Nature and the Environment • Cultural organizations: Finnish Environment Institute (SYKE), Finnish Meteorological Institute • Coastal municipalities • Finnish Safety and chemical agency • Ministry of Agriculture and Forestry • Metsähallitus
Cultural heritage	<ul style="list-style-type: none"> • Finnish National Board of Antiquities • HELCOM • Geological survey of Finland
Munitions clearance (underwater noise)	<ul style="list-style-type: none"> • Authorities: ELY Centre Uusimaa • Natural Resources Institute Finland (Luke) • Ministry of Defence and Defence forces
Ecosystem services	<ul style="list-style-type: none"> • Fishery authority • Transport Agencies and Ministry of Transport and Communication
Transboundary impacts	<ul style="list-style-type: none"> • Espoo Convention officials • Authorities: Estonian Ministry of Foreign Affairs, Ministry of Economic Affairs and Communication, Russian Ministry of Natural Resources • Scientific and research organizations and laboratories: Tallinn University of Technology, Marine System Institute, • NGOs: Eestimaa Looduse Fond (Estonian Fund for Nature), Eesti Roheline Liikumine (Estonian Green Movement), Sillamae Centre of Environment, Pro mare, ClientEarth Prawniczy dla Ziemi.
Other interested parties	<ul style="list-style-type: none"> • Port of Helsinki • Private persons

In particular, interested parties (authorities, NGOs, private person, companies and associations) that were informed on the project and provided statements to the EIA Report were:

- State authorities
 - Finnish Transport Agency (FTA)
 - Ministry of Social Affairs and Health
 - Defence Forces
 - AVI southern Finland (Environmental and health department)
 - Ministry of Transport and Communications, (Development and Network Department)
 - Finnish Safety and chemical agency (Tukes)
 - Ministry of Agriculture and Forestry
 - Finnish Transport Safety Agency (Trafí)
- Regional authorities:
 - Regional council of southwest Finland
 - Regional council of Kymenlaakso
 - Regional council of Uusimaa
 - Regional Centre for Economic, Transport and Environment, Southeast Finland
 - Regional Centre for Economic, Transport and Environment, Southwest Finland
- Cultural organisations
 - Finnish meteorological institute
 - National Board of Antiquities and Historical Monuments
 - Geological Survey of Finland
- City/municipality authorities:
 - City of Porvoo
 - municipality of Lemland
 - municipality of Virolahti
 - municipality of Pyhtää
 - municipality of Inkoo
 - municipality of Siuntio
 - City of Helsinki
 - City of Loviisa
- NGOs
 - WWF
 - Finnish association for Nature conservation
 - Greenpeace
 - ClientEarth Prawniczy dla Ziemi
- Companies:
 - Port of Helsinki
- Private persons

5 Stakeholder Engagement Activities Undertaken to Date

5.1 EIA / Permitting phase

EIA programme phase. The EIA programme public display was announced in 2012 by the Centre for Economic Development, Transport and the Environment (ELY Centre), Uusimaa. A total of 5 private opinions, 12 statements from municipalities and 18 statements from authorities was received in the national consultation.

During the public display period of the EIA programme, five public meetings were held to present the project and the programme. These meetings were chaired by the EIA coordinating authority. The Developer held information meetings with NGOs, local interested stakeholder parties in Kotka and Hanko and for key business stakeholders. Additionally, briefing meetings were held to inform the key city and port stakeholders in Kotka and Hanko and key business community stakeholders.

The general public and national, regional and local media were informed of the EIA programme phase and its progress via press conferences, press releases, information in the company website and social media.

Uusimaa ELY Centre sent the EIA programme to the Ministry of the Environment to be forwarded to the affected parties (as defined in the Espoo Convention) with an invitation to participate in the national EIA procedure. If an affected party decided to participate, it put the EIA programme on public display, collected opinions and returned them to the party of origin (Ministry of the Environment in Finland). Denmark, Estonia, Germany Latvia, Poland and Sweden informed that they want to participate in the Finnish EIA procedure. In total 10 international statements was submitted to the Finnish Ministry of the Environment and these were forwarded to the Coordinating Authority.

The NSP2 has organized meetings with Estonian authorities and scientific institutes. A public meeting was organized in Tallinn in EIA Programme public hearing phase. A citizen survey was carried out in Estonia in spring 2016.

EIA report phase. During the preparation of the EIA report an EIA expert group was established and agreed to meet at regular intervals to discuss specific assessment topics and unofficial drafts of the EIA report. The first unofficial draft was provided to the authorities on 8 June 2016 and the next version at the end September in order to be discussed in the EIA expert group meeting on 7 October 2016.

Stakeholders engagement activities during the EIA report phase included a number of authority, expert and NGO meetings, including one in Tallinn, Estonia for the Estonian NGOs, four local communities surveys via questionnaires, the preparation of web material for the NSP2 website and for the national map portal (see above and stakeholders engagement register). Also, information meetings have been and will be held for the business community and local Kotka and Hanko stakeholders. Media briefings have been and will be held on a national, regional and local level to inform the general public of the Project's progress. Business community and local stakeholders receive regular e-mailings and information of the status up-dates. Project up-dates and general information has been distributed via social media, namely Corporate and country Twitter accounts and LinkedIn. In total, 76 meetings

were held during the EIA Phase. The public hearing phase took place from 07 April 2017 to 05 June 2017. Public meetings on the Environmental Assessment Report Finland were held as follows:

- 3 May in Kotka
- 9 May in Helsinki
- 10 May in Hanko

EEZ permit and Water permit. The Regional State Administrative Agency for Southern Finland (ESAVI) and the Ministry of Economic Affairs and Employment (MoEE) are the permit authorities responsible for the granting of, respectively, the Water permit and the EEZ permit. After the EIA public hearing phase, approximately 25 meetings have been organized with both authorities as well as with Metsähallitus (Forestry authority managing the Natura areas), fishery associations and other interested parties.

Espoo consultation. The procedure for international consultation and how it is linked to national procedures has been discussed between the authorities in the countries (party of origin, affected party) and the Developer during the scoping phase. The national Coordinating Authority sent the EIA programme to the Ministry of the Environment, to be forwarded to the affected parties with an invitation to participate in the national EIA procedure. The affected party that decided to participate, put the EIA programme on public display, collected opinions and returned them to the party of origin (Ministry of the Environment in Finland). Ministry of the Environment forwarded then the feedback to the national Coordinating Authority, to be taken into account in its statement on the EIA programme. The same procedure was carried out for the EIA report. Within the framework of the international consultation on the Espoo Report, over 80 inquiries have been received that are relevant to Finland. This number includes both Finland-specific questions, such as munitions clearance in the Gulf of Finland and impacts on marine mammals, and questions of general interest, such as fisheries, Paris Agreement and climate objectives.

Fishermen. The Company has been engaging and will engage with local fishermen through the construction phase of the project to understand their concerns and to avoid or minimise potential adverse impacts. Nord Stream 2 has developed a compensation model for bottom trawlers in conjunction with the relevant national agencies and fishermen's associations.

Agreements are concluded with fishery associations in all the nine Baltic Sea countries. Associations are required to cover individual fishermen¹. Negotiations to reach agreements with fishery associations were carried out by NSP2. Permanent contacts were established and will be maintained during the project execution.

¹ W-HS-EMS-GEN-PAR-800-FISHEREN-01 Fisheries Livelihood Plan

Cable owners. Negotiations to reach agreements with cable owners were carried out by NSP2. Crossing agreements have been proposed to all the respective owners. Permanent contacts were established and will be maintained during the project execution.

HELCOM consultation. NSP2 provided information on the project during the 52 and 53 Heads of Delegation meetings. The information is included in HELCOM materials available on the web-site <https://portal.helcom.fi/meetings/hod%2053-2017-465/default.aspx> and <https://portal.helcom.fi/meetings/hod%2052-2017-405/default.aspx>

On the 5th of April 2018, NSP2 has received consent for the use of the Finnish EEZ from the Ministry of Economic Affairs and Employment, including immediate enforcement. On the 12th of April 2018, NSP2 has received the Water permit from the Regional State Administrative Agency Southern Finland, including authorization for preparation. The EEZ Consent became legally binding on 12th of July 2018.

5.2 Construction phase

Notifications. Detailed information about project construction activities is sent to the authorities on a regular basis (daily, weekly and monthly) as defined in the EEZ permit and in the Water permit. Fishermen and cable owners are also informed of the planned activities on a monthly basis in order to plan the work accordingly. Information about the works to be performed for NSP2 project, can also be found on the Notices to Mariners web-page, available at: <https://www.liikennevirasto.fi/ammattimerenkulku/merikartat/merikarttojen-paivytyspalvelu/tiedonantoja-merenkulkijoille-vuodesta-2005/2018#.W7HcLiB9jb0> and <http://www.sjofartsverket.se/sv/Sjofart/Sjokort/Ufs---Underrattelser-for-sjofarande-/Sok-i-databasen11/>. Informational letter to mariners was distributed to coastal sailing and yacht clubs in addition to Marine Rescue Association prior to start of preparatory works of the safety restrictions in the working areas.

Environmental monitoring. Results from technical and environmental monitoring during construction is provided to the ELY-Centres on a quarterly basis, as defined in the Environmental Monitoring Programme. In addition, annual reports, which include a more thorough discussion on the observed impacts, are presented to the ELY-Centres by the end of May of the following year. Results from the monitoring activities are presented through meetings with interested stakeholders such as Authorities and NGO on a regular basis. In addition, Monitoring Reports are uploaded on the NSP2 webpage

A full list of stakeholder engagement activities undertaken to date is included in the Stakeholders Engagement Register, which is an internal tool for tracking the stakeholders engagement activities, carried out by NSP2. The register however does not include the information on the regular notifications, calls, e-mails exchange.

5.3 Issues raised

All feedbacks received during the programme phase were taken into account in the preparation of the EIA Report. Similarly, the Coordinating Authority statement to the EIA report was taken into account for the preparation of the permit applications. Key topics and

requirements, included in the coordinating authority statement to the EIA report, and a description of how those requirements were taken into account in the permit application are presented in the permit application. A summary of the coordinating authority statement is presented in Appendix 2. The entire statement (in Finnish and Swedish) is available on the coordinating authority's website <http://www.ymparisto.fi/nordstream2YVA>.

Additionally, NSP2 received **36** statements to the EIA Report from: state authorities, regional authorities, city/municipality authorities, NGOs, private person, companies and associations. For example:

- SYKE provided a statement to the EIA Report with regards to potential impacts to the environment and to the monitoring stations. The issues raised by SYKE has been consulted with SYKE and addressed in the permit applications.
- Two statements to the EIA Report were received from fishermen organizations where concern on the potential consequences on fishery was raised. Discussions with commercial fishermen association have been completed.
- The National Board of Antiquities provided their statement to the EIA Report. The statement was generally positive, with indication of which underwater cultural targets should be included in the monitoring programme. Nord Stream 2 included these targets in the monitoring programme.

NSP2 received one appeal to the EEZ permit. The appeal to the EEZ permit has been dismissed by the Supreme Administrative Court and the EEZ became legally binding on 12th July 2018. There were two appeals on the Water permit decision to the Vaasa Administrative Court in May 2018. One appeal was from a private person and the 2nd from an international NGO. On the 07th November 2018, the Vaasa Administrative Court dismissed both appeals on the ground of lack of standing. The international NGO submitted a leave of appeal and appeal to the Supreme Administrative Court on 7th December 2018.

5.3.1 Grievances

Two grievances were received to date with regards to activities taking place in Kotka: 1) a citizen complained about the noise generated at the Rajavuori quarry and 2) South-East Finland ELY-Centre informed NSP2 of a complaint they have received regarding rocks on the road due to rock transport from the quarry to the port. Both issues have been solved by the contractor in charge of rock quarrying and rock transportation: in the first case, the source of the noise was monitored and reduced where possible and with these actions the complaint was resolved. In the second case, drivers were informed to check that no rock material is stuck in between the tyres and no more rock have been reported to have been found on the road.

6 Engagement plan

The Company's approach to stakeholder engagement is guided by Finnish law, international requirements and Company policy as described in Section 2.

This section contains a description of current approach to stakeholder engagement and information disclosure processes available at the moment.

6.1 Means of Engagement

The main mechanisms of information disclosure and stakeholder consultation are presented below. This section describes the means of engagement that could be **potentially** used in the context of the Project. The program presented in section 6.3 identifies methods that are actually executed at this stage.

Information distribution. Announcements about socially important events, which are organized by the Company, and also other needed information will be circulated and published as follows:

- Mass media: federal, regional, local newspapers.
 - Media briefings and press conferences. National, regional and local media briefings and press conferences are organised on a regular basis to provide accurate and current information of the project and its progress.
 - Press releases. The general public is informed via media of all relevant and important project milestones and current activities with press releases with direct distribution and placement in developer's website.
- Printed announcements, posted for local communities, give-aways
- Letters and /or e-mail exchange, including notifications to the authorities
- Brief information, project presentations
- Web-site <http://www.nord-stream2.com/>
 - General, as well as specific project and construction information is published on a company's homepage.
 - Statements / press releases are published on the company's homepage
- Map portal: was established for Finland to support transparency and provide additional tool to collect feedback during the EIA report public display. The map portal was used limitedly (e.g. about 10 visits in total during June and July 2017).

The portal was available for public and authorities in Finland to:

- Receive information from the project in map/GIS format;
 - Browse information by selecting different layers and using basic moving/zooming tools in map window;
 - Give feedback via the map portal as comments sent to the project developer and/or consultant by email;
 - Give official opinions on the EIA report via map portal as these opinions were sent directly to the coordinating authority by email.
-
- Social media

Project relevant information is distributed regularly via social media channels, namely via Twitter and LinkedIn to various stakeholders, such as media, think-tanks, local stakeholders and general public via Corporate and country Twitter accounts and LinkedIn.

Public hearing(s): During the public hearing period of the EIA report information sessions were held in Helsinki, Kotka and Hanko in order to give the public an opportunity to participate and comment on the possible consequences of the project in Finland. Public hearings were held to present the project and the assessment results. These meetings were chaired by the EIA coordinating authority.

Public liaison offices. The public liaison offices were opened by the authority during the EIA phase (from 06 April until 05 June) to bring to communities relevant information by posting hard copies of Project documents at public places.

The public liaison offices were opened within the EIA procedure in the agreement with local authorities in the following locations: Espoo, Föglö, Hamina, Hanko, Helsinki, Inkoo, Kaarina, Kemiönsaare, Kirkkonummen, Kotka, Kökar, Lemland, Loviisa, Mariehamn, Naantali, Parainen, Porvoo, Pyhtään, Raasepori, Salo, Sauvo, Sipoo, Siuntio, Turku, Virolahti.

Questionnaire surveys. The method is used where it is necessary to collect statistical data regarding certain social and economic issues or to research an opinion about the Project. The local communities are the key targeted group of the method.

Targeted informing and consulting. It is implemented through direct contacts of Project authorized persons with representatives of stakeholders or by using the telephone and on-line communication tools. Established contacts with representatives of the authorities, leaders of local communities and land owners, NGOs will be used in the targeted informing procedures.

Notification are sent to the authorities on a regular basis (daily, weekly and monthly) as defined in the EEZ permit and in the Water permit. Notifications cover planned activities and current activities. Additional notifications cover the start of construction (one month prior of start of construction) and start of pipelay (6 weeks before start of pipelay). Unplanned events (e.g. chance finds) are also notified to the competent authorities, as defined in the permit provisions. Fishermen are also informed of the planned construction activities on a monthly basis

Meetings. The meetings are held with stakeholders to inform them about the Project and its implementation progress and ensure a constructive dialog and exchange of opinions and information. Meetings can include:

- Community meetings
- Project information up-date meetings
- One-to-one meetings with different stakeholders from the list

Joint participation in public activities have been and will be coordinated with the contractors within the framework of ancillary activities for relevant stakeholder engagement and environmental and social management.

Workshops, forums and conferences. The Project consider forums as an important platform bring together various stakeholders and as powerful tools for sharing ideas, building consensus and developing commitment. The Project will participate and support research

workshops, forums and conferences. EIA working group have been organised, regular meetings have been carried out.

Visits to the site and Project facilities. Basically, the Project facilities are not of significant interest for visits due to their predominantly linear arrangement. Nonetheless, options will be examined to ensure for the representatives of stakeholders safe visits to the sites of the Project and its contractors. Site visits to the Nord Stream 2 pipeline's lay vessels may be organised for authorities and interested media, and site visits to the Nord Stream landfall can be organised for small groups of stakeholders.

6.2 Information Disclosure

In implementing the Nord Stream 2 Project the Company is committed to the principle of establishing a constructive dialogue with stakeholders from the early project implementation stage. The disclosed information will be clear and understandable and in accordance with the stakeholder engagement process stage and the project implementation schedule.

Disclosure of informational will be conducted through the lifecycle of the project. Documents that will be disclosed during the EIA process will be determined by the current stage of the process. Documents will be disclosed at the permit acquisition stages are listed in Table 3.

Table 3 Information Disclosure Plan

Document Title	Disclosure Date	Topic	Means of Disclosure	Stakeholders
Leaflet Presentation Communication materials	On-going	General Project information	Meetings Web-site Twitter	All stakeholders
The EIA report and the Espoo Report Maps and atlases EIA coordinating authority statement on the EIA report ending the EIA procedure	06/04/2017 - 05/06/2017 27/07/2017	EIA and Espoo report	Formal submission (hard copy and electronic version)	EIA coordinating authority, other authorities and municipalities. All stakeholders can visualize the documentation in the Liaison offices.
Natura Assessments for Sandkallan Submission of the Natura assessments to ELY Centre	03/07/2017 07/12/2017	Natura Assessment	Formal submission (electronic version)	Uusimaa ELY Centre

Uusimaa ELY Centre statement				
Natura Assessments for Kallbådan				
Submission of the Natura assessments to ELY Centre	10/07/2017	Natura Assessment	Formal submission (electronic version)	Uusimaa ELY Centre
Uusimaa ELY Centre statement	07/12/2017			
Natura assessment screenings for 3 areas: 1. Tammisaari and Hanko Archipelago and Pohjanpitäjänlahti Marine Protected Area 2. Söderskär and Långören Archipelago 3. Pernaja Bay and Pernaja Archipelago Marine Protection Areas				
Submission of the Natura screening to Uusimaa ELY-centre	12/07/2017	Natura Screening	Submission of electronic version	Uusimaa ELY Centre
Uusimaa ELY Centre Statement on the need for a Natura 2000 assessment				
Natura assessment screenings for Eastern Gulf of Finland Archipelago and Waters				
Submission of the Natura screening to Southeast ELY Centre	07/09/2017	Natura Screening	Submission of electronic version	Southeast ELY Centre
Southeast ELY Centre Statement on the need for a Natura 2000 assessment	20/11/2017			
EEZ Permit application:				
Submission of the EEZ permit application	18/09/2017	EEZ permit	Formal submission (hard copy and electronic version)	Ministry of Economic Affairs and Employment
Submission of a rejoinder based on received opinions and statements	18/01/2018			Council of State

to the published application. Permit decision by the Council of State	05/04/2018			
Water permit application: Submission of WP permit application Submission of a rejoinder based on received opinions and statements to the published application. Permit decision by ESAVI Press release of filing of application	19/09/2017 19/01/ 2018 12/04/2018	Water permit	Formal submission (hard copy and electronic version)	Regional State Administrative Agency of Southern Finland (ESAVI)
Stakeholder Engagement plan, Grievance mechanism	Q2 2017	Public participation in project activities	Hard copy upon request	All stakeholders
Notifications: - Start of construction - Daily, weekly and monthly notifications - Notification to fishermen	Q2 2018 Q2 2018/Q4 2018 Q2 2018/Q4 2018	Information on construction activities	Electronic submission (email)	Border Guard, FTA Cable owners Border guard, VTS, VTC, national coordinator and Turku Radio Fishermen organization
Environmental monitoring: - Quarterly reports - Annual reports	Quarterly reports will be provided three months after the end of the quarter. Annual reports - by the end of May the following year	Information on monitoring activities and results	Formal submission (Electronic submission copies and hard copies) Publication on NSP2 website	Southeast Finland, Uusimaa and Southwest Finland ELY Centres; Fishery authority at Southwest Finland ELY centre; environmental authorities of the cities of Espoo, Hanko, Helsinki, Kotka, Parainen, Porvoo, Raasepori and Loviisa and of the municipalities of Föglö, Inkoo, Kemiönsaari,

				Kirkkonummi, Kökar, Pyhtää and Sipoo
--	--	--	--	---

Information that will be disclosed to stakeholders during the construction and operation stages of the Project will include, but is not limited to, project progress and performance and/or monitoring reports and other project-related materials.

6.3 Stakeholder Engagement Program

An overview of the planned stakeholder engagement activities with breakdown by stakeholder group and Project phase is given in the table 4 below. This table will be updated through the life cycle of the Project. Where reasonably possible engagement activities will be joint for different objectives.

Table 4 Stakeholders Engagement Program

Stakeholder/Stakeholder Category	Engagement topics	Stakeholder Engagement and Methods	Timing	Responsibility	Key Actions/Disclosed Information	Location/Engagement Outputs
Construction phase						
All stakeholders	Munitions clearance, general construction activities	Information distribution	3.5.2018	Authority / Nord Stream 2 AG	Project implementation	E-mail Helsinki, Hanko and Kotka
Finnish Navy, border guards, transport agency		Notifications and meetings	2018 -2019	Nord Stream 2 AG	Project implementation	Helsinki
Shipping companies	Project activities	Information distribution, notification	3.5.2018	Authority / Nord Stream 2 AG	Project implementation	E-mail
Local communities	Project activities	Information distribution, meetings	05.-06.05.2018, 2019	Nord Stream 2 AG	Project implementation Communications/information materials	Kotka, Hanko
ELY centres, other relevant authorities	Environmental monitoring	Web-site, meetings	Regular, 2018-2019	Nord Stream 2 AG	Monitoring results reports	Hard copies and electronic submission NSP2 Web-site
NGOs	Project updates	meetings	January 2019 Q3 2019	Nord Stream 2 AG	Project information	Helsinki
Cable owners and & Fishermen	Project updates	Notification, Personal contacts	2018-2019	Nord Stream 2 AG	Project information	e-mail/notifications
Operational phase						

Stakeholder/Stakeholder Category	Engagement topics	Stakeholder Engagement and Methods	Timing	Responsibility	Key Actions/Disclosed Information	Location/Engagement Outputs
All stakeholders	Project implementation Environmental monitoring	tbc	2020 - 2022	Nord Stream 2 AG	Project reporting	tbc

7 Stakeholder Engagement Data Management

Stakeholder opinions and concerns are taken into account by the Company as a valuable source of information to optimize the design and outcome of the Project. The results of stakeholder engagement events will be systematically collected and included in a Company stakeholder database enabling tracking and monitoring of all follow-up actions required. All data is handled according to the EU General Data Protection Regulation.

The general decision-making process is described below in order to:

- Demonstrate transparency;
- Provide information about the Company's resources and decision-making level relevant to the raised issues; and
- Describe general procedures of addressing stakeholders' feedback.

A detailed internal procedure is used to manage stakeholder feedback (comments, grievances, etc.) so that it can be promptly processed and analysed by the Company personnel. Dedicated Grievance mechanism procedure² was developed and implemented by NSP2 to ensure grievances are managed and addressed in line with international requirements.

Stakeholders' feedback and grievances have been systematically collected and included in a Project Information Management System, enabling tracking and monitoring of follow up actions that may be required.

7.1 Means of Receiving Stakeholders Feedback

Stakeholders can submit a question, request for information/clarification, provide an opinion, or submit a concern or a grievance directly to the Company at any time using the contact points provided below:

- Corporate email address:
suomi@nord-stream2.com,
press@nord-stream2.com
info@nord-stream2.com
- Post: Baarerstrasse 52, 6300 Zug, Switzerland
- Corporate telephone number: available at the Project website <https://www.nord-stream2.com/>

Feedback communicated at meetings.

² W-HS-EMS-GEN-PRO-800-GRIMECEN-02 Grievance mechanism procedure

All feedback provided by stakeholders during one to one meetings, roundtable meetings or community meetings will be recorded in minutes of the meeting or in the notes.

7.2 Grievance Mechanism

A Grievance Mechanism is established to receive and facilitate resolution of external stakeholder grievances concerning the Project³. As necessary, specific measures targeted at certain stakeholders, such as those in nearby communities, may be required to ensure effective disclosure of the Grievance Mechanism.

A ***grievance*** is a complaint raised by an external stakeholder (individual or group), related to a specific impact or incident, and which needs to be formally registered and addressed through the Grievance Mechanism. Grievances can result from either real or perceived impacts of the Company's operations, including those of contractors. .

The Grievance Mechanism serves to:

- Minimise any adverse impacts of the Project on external stakeholders via quick and mutually acceptable resolution of grievances;
- Identify emerging adverse trends in terms of incidents/impacts at an early stage so that measures to prevent/avoid their occurrence can be implemented quickly and proactively;
- Demonstrate Company's respect for the interests of external stakeholders.

Key principles of the grievance management process are:

- Any person, group or organisation can submit a grievances at any time, without fear of retribution and at no financial cost.
- All grievances will be taken seriously and will be treated in a fair and respectful manner. The Company will respond to the complainant to confirm receipt of the grievance within seven working days.
- The process by which grievances will be received, investigated and resolved will be consistent and transparent. Representatives of contractors may be involved in the investigation where applicable.
- Information relating to a grievance investigations and eventual decision will be documented.
- Complainants will have recourse to an internal Company appeal mechanism if the complainant rejects the (first) decision.
- Personal information about the affected stakeholders will be treated as confidential (in accordance with the requirements of the current legislation).
- The mechanism will not impede access to judicial or administrative remedies.

The Grievance Mechanism procedure is illustrated in Figure 5 and described below.

³ A separate workers' grievance mechanism is being developed for the Project.

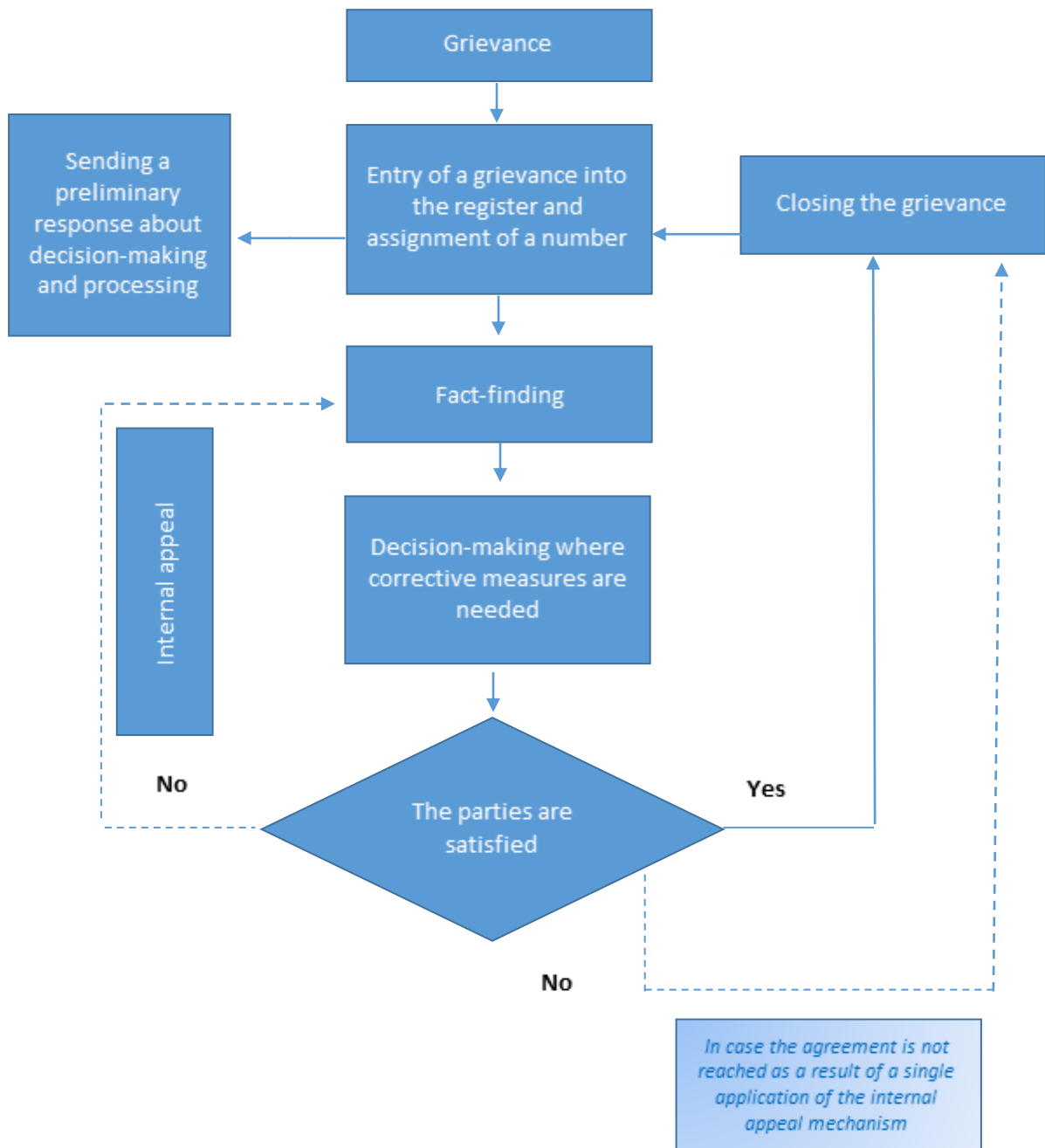


Figure 5 Grievance investigation flowchart

Stage 1: Grievance communication and logging (registration)

Grievances can be submitted via any stakeholder engagement and communication channel functional at the time of submission (including direct to the Company in Switzerland via e-mail address, telephone, and the mailing address as shown in section 7.1 above). All grievances will be logged.

Stage 2: Acceptance of grievance for investigation

The Company will respond to the complainant to confirm receipt of the grievance within seven working days from receipt.

Stage 3: Notification

As well as confirmation of receipt the complainant will also be provided with information about response times, next steps and a contact name with contact co-ordinates within the Company.

Stage 4. Investigation

The Company will investigate grievances and their surrounding circumstances. These investigations will involve various Project units and, if necessary, may involve consultation with the complainant. The Company will strive to complete the process of investigating the incoming grievances and identifying a resolution within 30 calendar days, and in more complex cases – within 45 calendar days of the receipt of a grievance.

Step 5: Resolution

A proposed resolution will be based on the results of the investigation. The proposed resolution will then be formally communicated to the complainant. The complainant will be first notified on the resolution process progress in 30 days period, and afterwards when the resolution is identified (in case it takes 45 days). If the proposed resolution is not accepted, the case may be resolved via application of an internal appeal process.

Stage 6: Monitoring and evaluation

After the accepted resolution has been implemented, it will be monitored and its effectiveness will be evaluated for a period of time agreed between the complainant and the Company. Relevant actions will be added to the Project commitments register.

Contractors may implement their own Grievance Mechanisms, but they must be aligned with the Company's Grievance Mechanism and they cannot be implemented until they have been formally approved by the Company. If contractors use their Grievance Mechanisms then contractors will report on the performance of the Grievance Mechanisms on a regular basis to the Company.

8 Resources and Implementation

This Finland SEP is a part of the environmental and social management system of the Project. Responsibility for the Finland SEP implementation at the current project stage rests with the Permitting Department at the Head Office of the Project (Zug).

The procedures for approval of information materials, disclosed information and stakeholder engagement methods are supported by the communications department.

Grievances are managed and resolved by a commission consisting of technical specialists, permitting specialists, HSE experts and specialists who are responsible for the management system. These taskforces, which are set up by advisory boards, are managed by authorized specialists from the Head Office.

The Finland SEP will be reviewed and updated on a regular basis during Project implementation as and when necessary, but at least once a year. Irrespective of this commitment, Company will ensure that an updated Finnish SEP is prepared prior to any important phase of stakeholder engagement and prior to initiation of construction activities and commissioning/operations. This will ensure the credibility and relevance of information contained in the Finland SEP, and will also ensure that the stakeholder engagement methods are in compliance with the legislative requirements and with the conditions of the Project implementation at different stages. Any significant changes relating to project activities and implementation schedule will be properly accounted for in each update of the Finnish SEP.

9 Monitoring and Reporting

It is important to monitor stakeholder engagement to ensure that consultation and disclosure efforts are effective, and in particular that stakeholders have been meaningfully consulted throughout the process. Stakeholder engagement monitoring will be part of the Project Environmental and Social Management System.

Monitoring will include:

- auditing the implementation of the Stakeholder Engagement Plan;
- monitoring consultation activities conducted with interested and affected stakeholders;
- monitoring the effectiveness of the engagement processes in managing impacts and expectations by tracking feedback received from engagement activities and recording and tracking commitments made to stakeholders; and
- monitoring any grievances received and their resolution.

Performance will be reviewed regularly against the Stakeholder Engagement Plan. Tracking of stakeholder engagement will be used to assess the effectiveness of the engagement activities. Indicators for tracking will include:

- materials disseminated: types, frequency, and location;
- place and time of formal engagement activities and level of participation including by specific stakeholder groups;
- number of comments by topic and type of stakeholder, and details of feedback provided;
- numbers and types of grievances and the nature and timing of their resolution; and
- community attitudes and perceptions based on media reports and stakeholder feedback.

Stakeholder Engagement reports will be prepared and disclosed by Nord Stream 2 AG on a yearly basis.

Annexes

Annex 1. Summary of key Stakeholders

Affected Stakeholders		
Stakeholder level	Stakeholder category	Stakeholder
International	Cable owners	<p>Telia Carrier AB</p> <p>Elering AS</p> <p>Fingrid OYJ</p> <p>Elisa Corporation</p> <p>CITIC Telecom CPC Netherlands B.V.</p> <p>Cinia Group</p> <p>Telenor Sverige AB</p> <p>+ 2 owners of planned cables</p>
	Pipeline	<p>Nord Stream</p> <p>Balticconnector (planned)</p>
	Events	Helsinki Tallinna race
State	Fishermen	<p>SAKL (Fishermen association)</p> <p>Kalatalouden keskusliitto ("Central Union of Fisheries")</p>
	Authority	Forest Authority
	Shipping companies	<p>Tallink Silja</p> <p>Viking Line</p> <p>Eckerö Line</p> <p>Finnlines</p> <p>Containerships</p>
Local	Boating clubs	<p>Brändö Seglare</p> <p>Esbo Navigatörer</p> <p>Espoon Merenkävijät</p> <p>Espoon pursiseura</p>

		<p>Espeen merenkulkijat</p> <p>Hangö Segelförening</p> <p>Hangö Udds Segelsällskap</p> <p>Hangö Udds Segelsällskap</p> <p>Haminan Pursiseura</p> <p>HMVK</p> <p>HSS</p> <p>HSK</p> <p>Borgå Navigationsklubb</p> <p>BSS</p> <p>Esbo Segelförening</p> <p>Espeen Kipparit</p> <p>Hakaniemen Venekerho</p> <p>Helsingin Meriveneilijät</p> <p>Koivusaaren pursiseura</p> <p>Lauttasaaren Veneilijät</p> <p>Merenkävijät</p> <p>Teekkaripurjehtijat</p> <p>Turun moottorivenekerho</p> <p>Turun Pursiseura</p> <p>Vuosaaren purjehtijat</p> <p>Westend Sailors</p> <p>Suomen Purjehdus- ja Veneily</p> <p>Suomen Meripelastusseura</p> <p>Merikarhut</p>
	Recreational sailors and events	<p>The Itäsatama marina</p> <p>Marina in Santalahti,</p>

		<p>Marina Hirssaari</p> <p>Marina on Kotkansaari</p> <p>Hanko Regatta</p> <p>Kotka Maritime Festival</p> <p>Espoo Suursaari race</p> <p>Kotkan meripäivät</p>
	Local communities	<p>Citizen and fishermen engaged via questionnaires</p> <p>Mussalo elementary school</p> <p>Four kindergartens in Mussalo</p> <p>A Mussalo hospice for disabled youth</p> <p>Central Hospital of Kymenlaakso</p>
	City Representatives	<p>City of Kotka,</p> <p>City of Hanko</p>
	Ports	<p>Port of HaminaKotka,</p> <p>Port of Hanko</p>
	Commercial	<p>Hovinsaari Power Plant</p> <p>Danisco</p> <p>Cursor Oy,</p> <p>Kotka-Hamina Regional Development Company</p>
Interested Stakeholders		
Stakeholder level	Stakeholder category	Stakeholder
International	NGOs	<p>Greenpeace Finland</p> <p>WWF Finland</p> <p>ClientEarth Prawniczy dla Ziemi</p> <p>Eestimaa Looduse Fond (Estonian Fund for Nature),</p> <p>Eesti Roheline Liikumine (Estonian Green Movement),</p>
	Conventions officials,	Espoo, HELCOM,

	Authorities	Estonian authorities
State	Authorities	<p>Ministry of Economic Affairs and Employment (MoEE)</p> <p>Defence Forces</p> <p>Ministry of Defence</p> <p>Ministry of Economic affairs and communication</p> <p>Border guards</p> <p>Ministry of Environment (Fin and Est)</p> <p>Ministry of Foreign affairs (Fin and Est)</p> <p>Hydrographic office</p> <p>Maritime authority for navigation</p> <p>Ministry of Transport and Communication</p> <p>Finnish Safety and chemical agency</p> <p>Ministry of Agriculture and Forestry</p> <p>Fishery authority</p> <p>AVI southern Finland (Environmental and health department)</p> <p>Finnish Transport Agency (FTA)</p> <p>Finnish Transport Safety Agency (Trafli)</p>
	NGO s, incl. Estonian	<p>FANC</p> <p>Nature and the Environment</p> <p>Sillamae Centre of Environment,</p> <p>Pro mare</p>
	<p>Cultural organisations</p> <p>Scientific & research groups</p>	<p>Finnish Meteorological institute</p> <p>Marine System Institute (Estonia)</p> <p>Tallinn University of Technology,</p> <p>National Board of Antiquities and Historical Monuments</p>

		Geological survey of Finland SYKE Natural Resources Institute Finland (Luke)
	Commercial	German-Finnish Chamber of Commerce, Confederation of Finnish Industries
	Media	Helsingin Sanomat, Hufvudstadsbladet, YLE, Lännen Media, STT, Tekniikka & Talous
Regional	Authorities	Regional Centre for Economic Development, Transport and Environment (ELY Centre) Regional Council Regional State Administrative Agency for Southern Finland (ESAVI)
	Media	Kymen Sanomat, Västra Nyland, YLE Kymenlaakso
Local	Commercial	Port of Helsinki
	Coastal municipalities	City of Porvoo City of Helsinki City of Loviisa City of Espoo City of Hanko City of Kotka City of Parainen City of Porvoo

		<p>City of Raasepori</p> <p>City of Loviisa</p> <p>municipality of Lemland</p> <p>municipality of Virolahti</p> <p>municipality of Pyhtää</p> <p>municipality of Inkoo</p> <p>municipality of Siuntio</p> <p>municipalities of Föglö</p> <p>municipalities of Kemiönsaari</p> <p>municipalities of Kirkkonummi</p> <p>municipalities of Kökar</p> <p>municipalities of Sipoo</p>
	Media	<p>Hangon Lehti,</p> <p>Ankkurilehti</p> <p>Boating magazines:</p> <p>Venemestari</p> <p>Vene & Kippari</p> <p>Saaristouutiset</p> <p>Purje</p> <p>Pro Sail</p> <p>Frisk Bris</p>

Annex 2. Summary of the coordination authority statement

The coordinating authority considers that the assessment report is properly prepared and adequate in this EIA phase. The EIA report provides a good basis for the preparation of Natura assessments and the permit application according to the Water Act.

The most significant harmful impacts of the project are caused during construction and are directed to marine mammals, which are the protection objective for Natura 2000 areas. Construction can also cause harmful impacts on sea birds and underwater habitats as well as promote the spreading of solid substance and contaminants. Furthermore, disadvantages can also be directed to offshore and onshore traffic during construction. During the operation, Nord Stream 2 project can cause harmful impacts on commercial fishery and restrict the future use of the Finnish Exclusive Economic Zone.

The coordinating authority presumes that harmful impacts will be assessed in more detail in the impact assessments of Natura 2000 areas, which are located in the project impact area. The latest information about munitions and their location from seabed surveys as well as mitigation measures regarding clearance activities must be taken into consideration in these assessments. Detailed plans for munitions clearance must be prepared in the permitting phase, when the results from Natura assessments are available.

Available mitigation measures to harmful impacts must be implemented as extensively as possible in the project. The timing of construction works must be planned so that areas having especially sensitive or threatened species should be avoided during the most susceptible periods of disturbance. Monitoring of harmful impacts and immediate repair works are necessary in order to avoid serious disadvantages and damages to fish, birds, mammals or other organisms caused by underwater detonations. An updated revision of the monitoring programme is to be presented during the permitting procedure.

The coordinating authority emphasizes that the southern route alternatives are clearly less harmful than the northern alternatives with regard to the environmental values of Natura 2000 areas and the future use of the Finnish Exclusive Economic Zone. The use of a dynamically positioned pipe-laying vessel in the Finnish Exclusive Economic Zone will reduce the need for munitions clearance and disadvantages to marine traffic and is clearly a less harmful alternative than the use of an anchor-positioned pipe-laying vessel.

The project developer must deliver a written rejoinder to the Uusimaa ELY Centre, which provides a relevant reply to questions and revision needs received in the international hearing procedure. The Ministry of the Environment will deliver a written reply to the providers of feedback.