

Unofficial translation

Summary - National Consultation Responses¹

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¹ This translation is provided for convenience only, and in the event of any conflict between the wording of the Danish and English versions, the wording of the Danish version shall prevail in all respects.



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Consultation Responses - Nationally

No.	Public Consultation Response	Response Energinet / GazSystem (Rambøll)	Response Danish Energy Agency
Citizen			
1	1. Choosing to criss-cross Denmark to help Poland rather than putting the whole installation in the water, primarily because it is cheaper.	<p>The considerations of a route at sea rather than on land (all together or partly) were made by the contractor in the preliminary phases and following the first public phase. The contractor has concluded that the project would not be economically or technically doable with a sea-based route. Furthermore, a number of the desired synergies by placing the pipeline on land (i.e. integration with the Danish gas system and the possibility of transporting biogas) would have been difficult to realise. The contractor has concluded that it would not be realistic to implement the BP project with a sea-based route, and hence, this possibility was eliminated early on.</p> <p>Therefore, the contractor has asked the authorities for permission for and environmentally assessed the specific project presented with a route crossing Denmark. Primarily for economic and technical reasons, the contractor did not find it realistic to include a sea-based alternative.</p> <p>As a specific sea-based route has not been defined, the environmental impact of such a route was not studied. However, it was considered by the contractor that constructing a pipeline exclusively at sea could have significant impact on marine nature, particularly in shallow areas. Hence, it was considered that it is not without environmental costs to place the pipeline at sea.</p>	The Danish Energy Agency has no more comments on this issue.
2	<p>2. The doubts about this project actually being in the best Danish interests or just good business</p> <p>3. a surprise about choosing a project that will retain us at the stage of phasing out fossil fuel through lower tariffs and security of supply. When we ought to make it more expensive not to switch to climate-friendly heating. According to the government we need to be CO2-neutral in 2050.</p> <p>4. Why don't we help Poland with wind or solar panel plants? Poland could go directly to climate-friendly heating rather than "just" to a better alternative than coal</p> <p>5. Worried if it ends costing the Danes money because of the long payback time vs. the technological development in environmentally sound energy.</p> <p>6. What will the Poles do when the agreement about gas from Norway ends? Will they continue buying, will they buy from Russia again, or will they choose environmentally correct solutions?</p>	-	The Danish Energy Agency has no comments on this as the consultation response does not concern environmental and security-based impacts from the project at sea in Denmark.
3	<p>Internationally:</p> <p>1. Why help Poland become independent from gas from Russia when deciding to build the Nord stream 2 gas pipeline from Russia right after that</p> <p>2. Worries if Denmark will create animosity with Russia by removing a source of income</p> <p>3. Worried that the compressor station will become a terror target</p>	-	The Danish Energy Agency has no comments on this as the consultation response does not concern environmental and security-based impacts from the project at sea in Denmark.

4	<p>For us as citizens it has been difficult to obtain real information about WHY one would generally choose to sell out of such a small country with limited wild nature and limited farmland?</p> <p>Gradually it has been revealed that the real objective of this incomprehensible project is geopolitical. It is a signal to EU that we obey orders to help Poland away from dependence on Russian gas. That sounds like a noble motive, now that Germany does not want to provide any land. But why did it need to stay so secret, why wasn't the project brought to light, why has no politician during the ongoing campaign emphasized his/her fight for this project?</p> <p>Because this is about fossil fuel, it has been argued that it is also to help Poland to get rid of dirty coal as an energy source. Thus, why keep such a 'positive' story out of the national media?</p>	-	<p>The Danish Energy Agency has no comments on this as the consultation response does not concern environmental and security-based impacts from the project at sea in Denmark.</p>
<p>Danish Health Authority Radiation Protection</p>			
5	<p>Legislation</p> <p>The Radiation Protection Legislation should be listed in line with other legislation that is significant for the project. Legislation about radioactive substances can be found at: https://www.sst.dk/da/straalebeskyttelse/radioaktivitet/lovgivning</p> <p>Cf. the Radiation Protection Legislation, companies that handle, generate or store radioactive materials, including NORM, must obtain permission from or inform the Danish Health Authority depending on the amounts and the concentration of activity in the material.</p>	<p>Energinet</p> <p>Energinet is in touch with SIS about their consultation responses. Energinet has already asked for and received permission to handle and store NORM waste. Presently a process is under way of updating the existing permit. Energinet is in touch with SIS about the permission process.</p> <p>Any radioactive materials will be collected in Egtved and handled in accordance with existing permits from the Environmental Agency and the Danish Health Authority.</p> <p>GazSystem (Rambøll)</p> <p>Energinet is responsible for the collection of NORM waste related to Baltic Pipe in Denmark.</p> <p>NORM can potentially occur as deposits on the inside of pipelines and process equipment. NORM waste may occur as part of cleaning operations using pigs in the operation phase. When pigs are sent from Denmark to Poland, potential NORM waste will end up at the collection facility in Poland. When pigs are sent from Poland to Denmark, the first collection facility will be at the compressor station. Hence, the handling of NORM waste is the responsibility of Energinet.</p>	<p>The Danish Energy Agency has no more comments on this issue.</p>
6	<p>Ownership</p> <p>It should be clear who is the legal owner of and responsible for potential NORM waste that can appear during operation as well as dismantling of the Baltic Pipe natural gas pipeline.</p>	<p>Energinet</p> <p>This issue is described in Energinet's existing permit.</p> <p>GazSystem (Rambøll)</p> <p>Energinet has the responsibility for NORM waste (see above, response no. 5)</p>	<p>The Danish Energy Agency has no more comments on this issue.</p>
7	<p>The term "NORM" is used in several places in the material without specifying what type of NORM may be expected to appear. A description of the following ought to be included:</p> <ul style="list-style-type: none"> • What radionuclides may be expected to appear and a description of their physical and chemical characteristics as well as their radio toxicity. • In what form (scale, mud, dust, etc.) NORM is expected to appear. • Estimated concentrations of activity of the relevant radionuclides in NORM waste, if possible (i.e. based on experience numbers). • Potential ways of dispersion and exposure. 	<p>In relation to the application described in response no. 5, Energinet responded to the questions that were raised.</p>	<p>Referring to response under 5 and 6.</p>

8	The environmental impact reports state that there will be no significant NORM problem in relation to dismantling the gas pipeline installation because the pipes will be cleaned prior to dismantling. It should be described how any potential residual NORM in the gas pipeline installation will be handled during dismantling.	At present, it has not been decided whether the pipeline will be removed or left in the seabed in relation to dismantling. If the pipeline must be removed, the dismantling project is expected to be environmentally assessed. The NORM problem will be assessed in relation to that.	Referring to response under 5 and 6.
Citizen			
9	That decision has been made by people who have no understanding of an occupation like farming. WHY DON'T YOU USE THE SEA AROUND US? RECONSIDER AND FIND OTHER POSSIBILITIES.	Energinet / GazSystem (Rambøll) Refer to response no. 1.	The Danish Energy Agency has no more comments on this issue.
10	We live in a time when we have to stop using fossil energy. Poland and other countries must change. Hence, this gas pipeline should be obsolete. I sincerely hope that it will be cancelled.	-	The Danish Energy Agency has no comments on this as the consultation response does not concern specific environmental and security-based impacts from the project at sea in Denmark.
11	If the project is carried out, we still think that the gas pipeline should be placed in a trench on the seabed, even if that means more expenses during construction and operation. That way, the costs will just go back to the project rather than being placed on landowners of Danish farmland for an eternity.	Energinet Refer to response no. 1.	The Danish Energy Agency has no more comments on this issue.
12	If Baltic Pipe is to be established, I fully believe that the gas pipeline should be laid in the water. This desire to spare the land and place a gas pipeline in the waters around Denmark has been presented over and over again by many from the beginning. However, it has been rejected with the argument that it is too expensive. No calculations have ever been shown of how much more expensive it would be to protect our land? I cannot accept that the country's governing parties do not find that our Danish landscape, nature, business and habitats are worth demanding payment to protect!	Referring to response no. 1	The Danish Energy Agency has no more comments on this issue.

Environmental Protection Agency			
13	<p>General comments pertaining to the North sea, Little Belt, and the Baltic Sea:</p> <p>1. After construction has ended in the North Sea, Little Belt, and the Baltic Sea, the extent of physical loss and physical disturbance to the overall habitat types will be assessed, documented, and reported to the Environmental Agency. The report on the extent of physical loss and physical disturbance to the overall habitat types (as defined in the Danish Marine Strategy, if possible) will be done once, immediately after construction has ended.</p> <p>The project has already confirmed this in the VVMs: "If the authorities require a report on the loss and physical disturbance of the seabed, an analysis will be submitted when the Baltic Pipe gas line has been established".</p> <p>Hence, it is recommended that the requirement of this report is included as a demand in the construction permit.</p>	<p>The contractors are committed to submitting the desired information about physical loss and physical disturbance of the seabed after construction has ended.</p>	<p>The Danish Energy Agency has no more comments on this issue.</p>
14	<p>2. It is recommended that a monitoring programme for sediment dispersion is implemented. At a minimum, monitoring the sediment dispersion should be carried out when there is sediment dispersion in sensitive marine habitats like eelgrass, biogenic reefs, and stone reefs. Monitoring sediment dispersion should be complimented by monitoring sensitive marine areas like eelgrass, biogenic reefs and stone reefs. Hence, monitoring will verify the basis for the assessment of potential environmental impacts as reported in the VVMs as well as document the degree of potential impact on sensitive marine habitats.</p>	<p>Energinet Energinet expects that the permit will include requirements about the development of a monitoring programme for the construction phase. The monitoring programme must include the environmental conditions related to the establishment of the pipeline and must be approved by the Danish Energy Agency prior to starting the construction of the pipeline. The recommendations of the Environmental Agency for monitoring sediment dispersion during construction will be included in the development of a monitoring programme.</p>	<p>It is a requirement of the permits that the contractor develops an environmental monitoring programme for the construction and operation phase, that must be approved by the Danish Energy Agency.</p> <p>The Danish Energy Agency will make sure that the Environmental Agency is involved in the process.</p>

Consultation Response - the North Sea

No.	Public Consultation Response	Response Energinet	Response Danish Energy Agency
Ørsted			
15	<p>Our comment concerns the Syd Arne gas pipeline that will not be crossed by Baltic Pipe, but according to the environmental impact report it is possible that anchor wires will have to be run across the Syd Arne pipeline. Hence, there is a risk of these wires potentially damaging the Syd Arne pipeline. Furthermore, Baltic Pipe will be established in such a way that its 200-meter protection zone and Syd</p>	<p>Energinet is in communication with Ørsted about the issue that Ørsted argues in its consultation response. The objective of the communication is to finalize an agreement about proximity routing between Ørsted and Energinet.</p> <p>Energinet relates to the agreement about proximity routing as an agreement about crossing.</p> <p>Energinet does not have the option of changing the route.</p>	<p>It is a standard condition of the approval that the contractor (Energinet) must reach an agreement with the owners of cable and pipeline installations that will be crossed by the pipeline. The</p>

	<p>Arne pipeline's 200-meter protection zone overlap during the construction and operation phase.</p> <p>Thus, we recommend that the Baltic Pipe route either moves further south so the anchor wires do not cross the Syd Arne pipeline and the protection zones do not overlap, or that a requirement is added to the construction permit:</p> <ul style="list-style-type: none"> - Energinet establishes an agreement with the owner of the Syd Arne pipeline about proximity routing. The agreement is made to secure indemnification of the owner in relation to the construction work. - Energinet must submit design and choice of method related to proximity routing to the Syd Arne pipeline for approval by the Danish Energy Agency after the agreement was finalized with the owner of the Syd Arne pipeline but prior to the construction of the pipeline. 		<p>aim of such agreements would be to ensure that the owners are indemnified as a result of the intersection. The contractor (Energinet) must take out insurance covering compensation for damages resulting from the activity carried out according to the permit, even if the damage is accidental. The contractor (Energinet) must submit design and choice of method in relation to crossing another infrastructure for approval by the Danish Energy Agency after an agreement has been made with the owner of the infrastructure that will be crossed but prior to the construction of the pipeline.</p>
Danish Ministry of Defence Estate Agency			
16	<p>Environmental Impact Report the North sea</p> <p>It is noted that the applicant is aware that the landfall of the pipeline will cross a prohibited area, cf. art. 5 of Decree 135 of 4 March, 2005 that states that all shipping in the area is prohibited for ships with a gross tonnage exceeding 5. The area is a prohibited area because the area is known for containing leftover ammunition or items that may be dangerous (Unexploded Ordnance/UXO). Thus, the Defense Command demands a UXO survey for this area. Application for shipping in the prohibited area must be submitted to the Danish Maritime Authority.</p>	The contractors are familiar with the legislation of this area and will follow the procedure as described.	The Danish Energy Agency has no more comments on this issue.
17	<p>Unexploded Ordnance (UXO)</p> <p>On several parts of the pipeline there is a risk of UXO occurrence. Against this background, the Defense Command recommends that another UXO survey be carried out before the work on the seabed starts.</p> <p>The Defense Command is aware that the applicant has coordinated precautions and handling of UXO risks with the Navy's mine clearing service. Coordination directly with the mine clearing service is still possible but it is underscored that the Defense Command must approve the plan for the UXO survey. After approval, the UXO survey may be carried out. After the UXO survey is finalized, a list of</p>	The contractors are familiar with the legislation of this area and will follow the procedure as described.	The Danish Energy Agency has no more comments on this issue.

	potential UXO discoveries will be provided, which will be reviewed by the Navy's mine clearing service.		
18	<p>It is emphasized that in a potential subsequent phase of the investigation that includes an actual identification of established anomaly/anomalies, a mine team leader from the mine clearing service must be present. Expenses incurred for this are paid by the applicant.</p> <p>The Defense Command points out that in case of verification of leftover ammunition or items that may be dangerous (UXO) the work must stop immediately, and the Joint Operations Center must be contacted, cf. Decree 1351 of 29 November, 2013, art. 14 about shipping safety in relation to construction work and other activities, etc. in Danish waters.</p>	The contractors are familiar with the legislation of this area and will follow the procedure as described.	The Danish Energy Agency has no more comments on this issue.
19	Besides the above conditions, attention must be drawn to the fact that the granted permissions as well as the contact details for the ship or ships that is/are to carry out the work must be made available to the Joint Operations Centre via the authority granting the permission. If there are any updates for the contact information, they can be forwarded to the Joint Operations Center at these addresses:	The contractors are familiar with the legislation of this area and will follow the procedure as described.	The Danish Energy Agency has no more comments on this issue.
Danmarks Fiskeriforening (Danish Fishermen PO)			
20	<p>North Sea</p> <p>As the report also points out, the area close to the coastline where the gas pipeline will come ashore is home to large-scale shrimp fisheries. In addition, where the pipeline crosses sandbanks, it will pass through fishing grounds for sand eel; areas with a very extensive and valuable fishery from April to July. The entire length of the pipeline in the North Sea is a potential area of industrial fishing primarily with nets or trawl. If rock materials are placed on top of the pipeline to protect or secure it, it must be coordinated with the fishermen as important fishing grounds could be destroyed.</p> <p>As pointed out in the report, it is imperative to assess the project in relation to the cumulative effects of other pipelines and cables in the North sea. As indicated in section 6.8.5, there is a large number of cables for which exemption from the Cable Order has just been applied for and approved, so that industrial fishing may take place in the protection corridor from now on. By not applying for exemption, fishing will be reduced in a much larger area than just the security zone, particularly if there are other pipelines and cables in the immediate area. It is also the assessment of the fishermen that there will be extensive disturbances to fishing in the area of the Baltic Pipe, if fishing is not allowed over the pipeline.</p> <p>It is essential that fishermen can operate above the pipeline, and that exemptions from the Kabelbekendtgørelsen (Order Regarding Protection of Submarine Cables and Submarine Pipelines) are</p>	<p>Energinet is in process of clarifying if an exemption can be issued that will allow fishing above the pipeline. As part of the ongoing negotiations with fishermen in accordance with art. 78 in the Fisheries Act, Energinet will include the decision in their deliberations, and potential compensations will reflect this.</p> <p>If rocks are placed along the pipeline, this will follow regular practice that enables trawling. A slope of 1:2.5 is expected on the constructed rock bank.</p>	It is a requirement for the permissions that an agreement between Danmarks Fiskeriforening and Energinet in relation to the North Sea and the Little Belt, and Gaz-System in relation to the Baltic Sea is forwarded to the Danish Energy Agency when it is available but no later than the start of the construction of the pipelines.

	<p>granted so that it is possible to freely carry out fishing activities above the pipeline after the construction has finished.</p>		
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Public Consultation Responses - Little Belt

No.	Public Consultation Response	Response Energinet	Response Danish Energy Agency
Citizen			
21	A change in the routing could be out of Føns peninsula and all the way out on the tip crossing over Little Belt as planned. I can't imagine that the EU/Natura 2000 would have any objections to that, to secure Middelfart against terrorist attacks.	<p>Natura2000: A pipeline route along with the existing gas pipeline north of the bridges has been investigated and has been ruled out as an alternative route, as there has been an expansion of both urban areas and infrastructure on both sides of Lillebælt, which makes an extra pipeline impossible.</p> <p>Potentially routing the pipeline through the Natura 2000 area "Little Belt" was also investigated. Danish legislation for Natura 2000 areas makes it impossible to give permission to a project if that project will cause damage to an international nature conservation area. Furthermore, it is pointed out that exemption can only be issued in special circumstances, including that there is no doable alternative.</p> <p>In addition, it is stated that the Natura 2000 area is both placed on land and at sea. In case of a route through the Natura 2000 area on land, an exemption from the ban for planning in a Natura 2000 area from the planning authority would have to be issued as well as a permit from the Environmental Agency. According to the Planning and Development Act no major technical installations can be planned in Natura 2000 areas. However, it is possible to obtain an exemption from this provision - as was the case for Baltic Pipe at the west coast of Jutland - if an impact can be rejected or if there are vital societal interests related to the project as well as no doable alternative available.</p> <p>Early in the process Energinet decided not to work on a routing through the Natura 2000 area of "Little Belt". A significant reason is that a route was identified that respects the international conservation areas and initially was estimated as having no significant environmental impact and technically doable.</p> <p>According to the interpretation of the Environmental Assessment Act, the current solution north of the Natura 2000 area in the Little Belt will have no significant impact that cannot be reduced to an acceptable level by the project through a number of preventive measures. This is described in more detail in the environmental impact reports for Little Belt and the land-based part of the project.</p>	The Danish Energy Agency has no further comments on Natura 2000 and no comments on securing Middelfart against terror attacks as this does not concern specific environmental and security-based impact of the project at sea in Denmark.
22	At best, a route around Denmark as described at the meeting in Odense could be considered. However, according to the proponents of the project, this solution would be much more expensive.	Referring to response no. 1	The Danish Energy Agency has no more comments on this issue.
Fænø Estate			
23	Fænø Estate sees it as positive that a decision was made to bury the pipeline across Little Belt rather than placing it on the seabed. All other things being equal, this will reduce the permanent impact in this unique nature preserve.	-	This is a comment that does not require a response.

24	<p>However, Fænø Estate is still worried about the project's impact on the environment in the construction phase, particularly sediment spills and dispersion during the extensive excavation work. The environmental impact report from Niras A/S clearly shows that the impact on Fænø during the excavation work depends on what route is chosen for the pipeline. Thus, the route through the shallow area close to Fænø (called 'B2') is expected to lead to deposition of fine sediment (silt) at the south and east facing shores of Fænø, whereas the route through deeper waters further south (called 'B1') is not expected to have a negative impact on Fænø.</p>	-	<p>This is a comment that does not require a response.</p>
25	<p>Cf. the environmental impact report, it is expected that route B2 will lead to sediment deposition of approximately 10-50 mm on the shores of Fænø. It is noted that such an estimate for sediment deposition largely depends on the actual currents when the excavation work is carried out. Hence, the estimate has a large margin of error. Based on this, Fænø Estate strongly encourages minimizing the risk to Fænø by placing the pipeline as far south as possible, equivalent to route B1.</p>	<p>Energinet confirms that the pipeline will not be routed through the areas of eelgrass south of Fænø, as shown in fig. 6.18. However, a temporary platform may be needed for the installation of the pipeline from a barge or the like that would only affect a very small part of the areas of eelgrass south of Fænø. Hence, Energinet is not interested in removing the area from the permit. The issue is covered by the environmental impact report.</p>	<p>The Danish Energy Agency has no more comments on this issue.</p>
26	<p>The present draft of the establishment permit from the Danish Energy Agency does not determine the exact route of the pipeline across Little Belt. This should be changed to include route B1 as a mandatory condition for the project in the final establishment permit from the Danish Energy Agency.</p>	-	<p>The Danish Energy Agency has no comments on this as the consultation response does not concern specific environmental and security-based impacts from the project at sea in Denmark.</p>
27	<p>Furthermore, regardless of the routing, the potential impact on Fænø (including sedimentation of the shores) must be included in the monitoring programme of the construction phase, cf. section 1.2, art. 5 in the draft of establishment permit from the Danish Energy Agency.</p>	<p>Energinet will take formal notice of the recommendation by Fænø Estate when preparing a proposition for a monitoring programme.</p>	<p>It a standard condition of the approval that Energinet must prepare a monitoring programme for the construction and the operation phases. The monitoring programme must include the environmental conditions and must be approved by the Danish Energy Agency prior to starting the construction of the pipeline.</p>

Middelfart County			
28	Middelfart County has some scepticism in relation to the plans of establishing the Baltic Pipe. The project enables an increase in the use of natural gas in Denmark. As shown in the consultation materials, it is expected that Baltic Pipe will lead to a small increase in the use of natural gas in Denmark. An increase in the use of natural gas will not only make it even more difficult to reach the goal of the energy agreement of a 55 % share from renewable energy sources in 2030, it will also increase the difficulty of reaching independence from fossil fuels in 2050 because a larger demand for natural gas will have to be covered by green gas.	-	The Danish Energy Agency has no comments on this as the consultation response does not concern specific environmental and security-based impacts from the project at sea in Denmark.
29	Also, Middelfart County would like to point out that supplying natural gas to Poland will increase the risk of stalling the green transition in Poland after they get natural gas as it eliminates the incentive to switch to green energy. Even if the CO2 emissions are reduced in Poland by switching from coal and oil to natural gas, a much larger CO2 reduction could be achieved by switching to geothermal, wind energy or the like. This development will be inhibited because of Baltic Pipe.	-	The Danish Energy Agency has no comments on this as the consultation response does not concern specific environmental and security-based impacts from the project at sea in Denmark.
30	In conclusion, Middelfart County cannot support this project and recommends that it is abandoned.	-	The Danish Energy Agency has no comments on this as the consultation response does not concern specific environmental and security-based impacts from the project at sea in Denmark.
31	Middelfart County is worried about the size of the chippings that are expected to be used for the restoration of the pipeline trench where the sediment cannot be recycled. Energinet is expected to use chippings of 5-15 cm, covered by rocks of more than 30 cm. In a current project the county works on establishing a stone reef, expecting to use rocks of 50-80 cm to avoid the rocks from being swept away once they are overgrown by macroalgae. Energinet needs to secure that the chippings in the pipeline trench are covered sufficiently to secure that they are locked to the pipeline trench.	<p>It is important that the rocks are not removed by currents, and thus, a study was carried out about what type and size of chippings were needed to avoid this. The result was 5 - 15 cm. Backfilling of rocks will be done for the entire distance. The conditions vary along the crossing, primarily water depth, depth of the pipeline trench, and speeds of currents at the seabed.</p> <p>As a guiding principle, the rocks will be placed in the trench to achieve a 'lee-effect' that will have a positive effect on stabilizing the rock backfill.</p> <p>For the sections at the western trench, a natural sediment transportation, consisting of sandy materials, is expected in a north-south direction, and is expected to cover the rock cover as it is originally below seabed level. For the section south of Fænø, modelling and measurements of current speeds have shown that the current speeds have been reduced significantly compared to the western trench.</p> <p>For protection of the coastal areas, larger rocks that will be covered by seabed materials equivalent to present materials, will be used.</p> <p>Energinet will re-assess and secure that the rock chippings will stay in the trench above the pipeline.</p>	The Danish Energy Agency has no more comments on this issue.

32	<p>Middelfart County recommends to choose a route south of Fænø that will harm the marine nature types as little as possible. Hence, the county advises against a route that crosses through the well-established eelgrass meadow.</p> <p>Both establishment and re-establishment of the pipe trench will result in increased sedimentation, and there is a risk it will cover over the remaining eelgrass. There is a risk that re-establishment of the pipe trench will lead to a stratification of the sediment with the finest grain at the top, which will be less suitable for both establishment of new shoots and spreading of the existing stock. Re-establishment with gravel entails a risk that the gravel will become mobile when macroalgae attaches. This causes the gravel to be dragged around the eelgrass bed and break down parts of it.</p>	<p>Energinet confirms that the pipeline will not be routed through the areas of eelgrass south of Fænø, as shown in fig. 6.18. However, there may be a need for a jack-up to be used, which functions by being anchored to the seabed with four legs, and which will be able to be used in connection with the installation of the pipeline from a barge and therefore they are not interested in the area being removed from the permit.</p> <p>Energinet has prepared an environmental impact report assessing the consequences the pipeline will result in if it is established within the project corridor. This has identified some mitigation measures (such as re-establishment), challenges (involving avoiding the pipeline being laid through the eelgrass areas south of Fænø) and adaptations (such as excavation) that allows for the pipeline to be laid where technical and safety conditions dictate. Energinet does not believe there is justification to exclude any further areas, as no significant impacts were found.</p>	<p>The Danish Energy Agency has no more comments on this issue.</p>
33	<p>Middelfart Municipality also believes that Energinet should consider harvesting and replanting eelgrass shoots when digging has to be done through the eelgrass beds by the landfall stations. Specifically, the shoots can be harvested in the construction trench, which can be replanted on the edges of the eelgrass beds, so they can be extended towards the sides to preserve the size of the eelgrass bed.</p>	<p>The environmental Impact report assesses that the impact on the eelgrass areas by the landfalls is limited and that the impact is not significant.</p>	<p>As part of the standard conditions for establishment permits, there is a requirement that the developer shall prepare a monitoring programme for the construction phase, including in connection with laying the pipeline.</p> <p>The monitoring programme must include the environmental conditions and must be approved by the Danish Energy Agency prior to starting the construction of the pipeline.</p> <p>The developer shall also assess the pipeline after, including a post-lay survey. The assessment with conclusions shall be submitted for the Danish Energy Agency's approval with regard to whether further seabed intervention work shall be performed. The developer shall also prepare a monitoring programme for the operating phase.</p>

			The monitoring programme shall include the environmental conditions and be approved by the Danish Energy Agency before the pipeline is put into service. The developer shall publish the results from the monitoring during the construction and operating phase for the environmental conditions when they exist.
34	The municipality wants to receive monitoring results for the re-established trench. The municipality is particularly interested in the mobility of the gravel, which should be monitored over several seasons in line with increased macroalgae fouling and during re-colonisation of the pipeline trench.	Middelfart's request for monitoring results for the re-established trench can be accommodated. Results of the monitoring can be transferred to Middelfart Municipality, Kolding Municipality and Naturpark Lillebælt.	The Danish Energy Agency notes that a condition has been set in the permits that the developer shall publish the results from the monitoring during the construction and operating phase for the environmental conditions when they exist.
35	When the pipeline is placed, a monitoring of the pipeline in Lillebælt will be implemented. It is encouraged for further monitoring of the pipeline in Lillebælt to be implemented after 1, 3 and 5 years to ensure that the pipe, rocks, stone reefs and flora and fauna are developing as provided for in the project.	Energinet has not yet decided on the frequency of the seabed surveys of the installed gas pipeline in Lillebælt, as the interval is decided based on a risk-based approach. Middelfart Municipality's request for monitoring of the pipeline after 1, 3 and 5 years is noted.	The developer (Energinet) shall prepare a monitoring programme for the establishment and operating phase. The monitoring programme shall include the environmental conditions and be approved by the Danish Energy Agency before the pipeline is established and put into service.
Citizens			
36	You are destroying Gl. Ålbo camping and most likely the last of the fishing in Lillebælt. Ultimately, it might be better and cheaper to run the pipeline through the bird area, but it might be too difficult politically!	Fish are assessed in the environmental impact report (section 6.6) and there is not assessed to be a significant impact on the fish populations in Lillebælt. Also refer to the consultation response (no. 55) (Gl. Ålbo). A pipeline route along with the existing gas pipeline north of the bridges has been investigated and has been ruled out as an alternative route, as there has been an expansion of both urban areas and infrastructure on both sides of Lillebælt, which makes an extra pipeline impossible. Potentially routing the pipeline through the Natura 2000 area "Little Belt" was also investigated. Refer to response no. 21.	The Danish Energy Agency has no more comments on this issue.

Citizens			
37	<p>If it is very important to establish a gas pipeline to Poland, which is something I do not have any understanding of, then it is only justifiable to lay it through the Little Belt and the Baltic Sea and not on land, which I will now argue.</p>	<p>Refer to response no. 1.</p>	<p>The Danish Energy Agency has no more comments on this issue.</p>
38	<p>This consultation response concerns the crossing of Lillebælt. I understand that it is difficult and have read all your reports concerning environmental and technical considerations, but I am speechless that you absolutely have to land on the Funen side by Skrillinge Strand and thus destroy the business of commercial fishermen who have been fishing at this particular site for many years.</p> <p>Drilling under Lillebælt from Stenderup and to Føns Odde, for example, may be preferable with all the risks just in listing all the methods that could be brought into play in the project. It is surprising that there are currently several solution models being operated with and there has not been a decision on which method to use.</p> <p>4 (four) lines on page 60 of the report were used to establish that drilling has been investigated and is too expensive. This is an assessment that I would like to have much more thoroughly explained in the 346-page report.</p> <p>According to your own material, the gas pipeline shall be drilled in Faxe Bay so that there may also be a possibility in Lillebælt. If this is a more expensive solution, Poland and the EU must pay more, because I think it is plenty for Danes to pay 12 billion to excavate from west to east for a very small profit in the account after 30 years, if your own calculations are correct.</p>	<p>A pipeline route along with the existing gas pipeline north of the bridges has been investigated and has been ruled out as an alternative route, as there has been an expansion of both urban areas and infrastructure on both sides of Lillebælt, which makes an extra pipeline impossible.</p> <p>Potentially routing the pipeline through the Natura 2000 area "Little Belt" was also investigated. Refer to response no. 21.</p> <p>Compensation of the affected commercial fishermen has been negotiated in accordance with the Danish Fisheries Act (<i>fiskeriloven</i>) § 78.</p> <p>As stated in Energinet's application (not environmental impact report), only a buried pipeline running over Lillebælt has been applied for. The summary of the application is available on the Danish Energy Agency's website.</p> <p>Energinet, in collaboration with Design Rådgiver, has assessed alternative construction methods such as a tunnel or drilling (Horizontal Directional Drilling (HDD) or Direct Pipe).</p> <p>In general, the establishment of the gas pipeline via a tunnel under Lillebælt would involve significant costs. It would also require greater construction space and significant transport of materials, with the accompanying traffic for landfall on Jutland. This solution is therefore not considered to be a possible alternative to the proposed solution.</p> <p>An HDD or Direct Pipe has technical limitations in terms of the size of pipes and length of drilling. There are no reference projects with a length of 4 km, which is required for Lillebælt, and both of these solutions are thus not technically possible alternatives.</p>	<p>The Danish Energy Agency has no more comments on this issue.</p>
39	<p>We are interested in the environmental consequences of crossing over Lillebælt by Gl. Ålbo and to Middelfart. A distance of 4 km. The large mass of excavated material from the seabed will be dumped in the sea by Trelde. Later, they intend to excavate the material by Trelde again and then dump it over the gas pipeline in Lillebælt. We assess that there is far too great a negative environmental impact in moving the material back again and politely request that the excavated material be left dumped at Trelde Næs!</p> <p>We sincerely request that an entirely new stone reef be established on top of the pipeline route. This will result in a lasting habitat improvement for the marine environment in the area with particularly positive consequences for the fish populations in the area. We have read page 26 in the folder for the Baltic Pipe Project and would strongly advise against choosing short-sighted and economically</p>	<p>The material to be moved and dumped by Trelde Næs Klappads (disposal site) will not be transported back after the pipeline is established, as it will have a negative impact on the environment, which could be avoided by not transporting the dumped material back.</p>	<p>The Danish Energy Agency has no more comments on this issue.</p>

	cheap solutions. Take the opportunity now to make a lasting habitat improvement.		
Citizens' group			
40	During the construction period, you will actually block the only two transport routes that porpoises have when they swim from the northern part of Lillebælt to the southern part and back. This is also at a time when the porpoises have young, and as a result they are even more vulnerable to noise and disturbance than usual.	The impact on porpoises is assessed in a Natura 2000 impact assessment, which is regarded by the agency. The impact assessment, which concludes that the project will not cause harm to the porpoises with the proposed mitigation measures, is accepted by the agency, and the project can thus be implemented with the planned mitigation measures.	The Danish Energy Agency notes that conditions have been set for the permit regarding mitigation measures to reduce the noise impact on Appendix IV species, including porpoises.
41	The study shows that porpoises are very vulnerable to disturbances such as noise from boats, drilling, drilling platforms etc., because it hinders their ability to hunt through echolocation. They are also particularly vulnerable to pollution, climate changes and changes in law that affect fish populations, because they need large numbers of small fish much more frequently than larger whale species. The construction work will cause all mentioned parts.	Refer to response no. 40.	Refer to response no. 40.
42	I.e. the laying of the Baltic Pipe will risk both interfering with the porpoises' mating period and will definitely interfere with their time with new-born young, if we are to believe Energinet's schedule. This underscores the necessity of moving the gas pipeline's location so that it does not affect the porpoises' ability to survive and reproduce.	Refer to response no. 40.	Refer to response no. 40.
43	<p>2. In a technical sense, you have chosen a difficult solution due to the very special current conditions in Lillebælt - right where you have laid the pipeline route. There are also special seafloor conditions here with large rocks under the top seafloor layer. This will make the pipe laying difficult and the impact on the environment greater.</p> <p>3. During the construction phase, sailing will be adversely affected for both leisure craft and commercial vessels. This includes closure of Gamborg Fjord for two months.</p> <p>4. During the construction phase, both commercial and recreational fishing will not be possible, and there is no doubt that fishing will be negatively affected for a long period, possibly years. Ultimately, it will continue as before.</p> <p>5. Where the gas pipeline goes on land on the Funen side by Skrillinge Strand, it will cause a very serious inconvenience for the nearby residents. There will be very loud noise disturbances for periods, maybe even harmful to health. The disturbances will also affect neighbouring residential areas.</p> <p>6. Some driving with heavy vehicles will be necessary. There may also be presumed to be foundation damage to the nearest properties when sheet piling is hit. The experience basis for vibrations when sheet piling in Lillebælt's clay is not clearly defined, which creates uncertainty and unease.</p>	<p>2. Energinet has assessed the pipeline route is feasible and Energinet is aware of the local conditions that could affect the construction work.</p> <p>3. Gamborg Fjord will not be closed. However, limited access is expected for short periods. The project's impact on public traffic in the area has been assessed and no significant impact was concluded.</p> <p>4. With regard to commercial fishermen, Energinet will enter into negotiations regarding paying compensation in accordance with the Danish Fisheries Act (<i>fiskeriloven</i>) §78. The impact on the fish populations is discussed in section 6.6 in the environmental impact report, and it is concluded that the work will not have a significant impact on the fish populations in Lillebælt.</p> <p>5. The noise in and around Lillebælt is handled by implementing noisy activities on land during normal working hours between 7 a.m. and 6 p.m. on weekdays and is limited to shorter periods (i.e. up to 4 weeks on the Funen side). Noise from activities on land during the other periods will be muffled to a maximum of 40 dB by the nearest residence. Noise contributions from the sea side will only exceed 40 dB by the nearest residence for short periods, as the noise comes from vehicles moving along the pipeline trench.</p> <p>The items 6-8 are considered in the environmental impact report for e land-based part and does not concern the sea-based part. Section 9 is not relevant in terms of the environmental assessment of the Baltic Pipe project.</p>	The Danish Energy Agency (<i>Energistyrelsen</i>) has no further comments for 2 - 3. With regard to 4, note that there is a condition for the permit that an agreement between Danish Fishermen PO (<i>Danmarks Fiskeriforening</i>) and Energinet concerning Lillebælt be submitted to the Danish Energy Agency when available, though no later than when the laying of the pipeline is begun. With regard to 5, refer to response no. 49. A condition has also been added to the permit that the noise-dampening mitigation measures in Lillebælt described in the

	<p>7. The residents are also worried about a long period of heavy traffic with large trucks and construction machinery on the access road to Skrillinge Strand. The road is so narrow that not even two regular cars can pass each other. There are no bike paths or sidewalks, there is a ditch on one side and a fence on the other. Therefore, we the residents are concerned about traffic safety, particularly for bikes (our children especially) as well as the many people who walk on the road daily.</p> <p>8. The golf course in Middelfart will be seriously affected during the construction period, even though the golf club has been promised that the work will be done in the off-season. Of the approximately DKK 3 million that was recently spent on updating the golf course, some will most likely be wasted.</p> <p>9. Anti-terrorism protection of a gas pipeline of the projected size is not possible. Therefore, an attack on the land-based pipeline, particularly in urban areas, would have disastrous consequences.</p>		<p>environmental impact report be met.</p> <p>The Danish Energy Agency has no comments on this as items 6-9 do not concern specific environmental and security-based impacts from the project at sea in Denmark.</p>
44	<p>The most immediate solution to the mentioned problems would be to choose a more southern pipeline route in Lillebælt.</p> <p>If a solution could be pointed out, it could be from the area between Frydensborg and Skibelund on the Jutland side across Bredningen north of Brandsø and on land on the Funen side at the bottom of Tybrind Vig. Other more southern pipeline routes are also possible.</p>	<p>A pipeline route along with the existing gas pipeline north of the bridges has been investigated and has been ruled out as an alternative route, as there has been an expansion of both urban areas and infrastructure on both sides of Lillebælt, which makes an extra pipeline impossible.</p> <p>Potentially routing the pipeline through the Natura 2000 area "Little Belt" was also investigated. Refer to response no. 21.</p>	<p>The Danish Energy Agency has no more comments on this issue.</p>
45	<p>Finally, it should be noted that there are four coastal cultural areas registered in Middelfart Municipality that are assessed to be particularly worth preserving. One of these is Skrillinge Strand, which with the existing pipeline route, would be significantly affected, and at worst completely destroyed.</p>	<p>Please note that the project area is left in the same condition as when it was taken over, and that there are only impacts during the construction phase.</p>	<p>The Danish Energy Agency has no more comments on this issue.</p>
<p>The Danish Ministry of Defence Estate Agency (<i>Forsvarsministeriets Ejendomsstyrelse</i>)</p>			
46	<p>It is stated in Baltic Pipe Project 2a – non-technical summary, p. 25, that "Access to Gamborg Fjord is expected to be closed for a period of up to 2 months".</p> <p>The Danish Defence Command (<i>Værnsfælles Forsvarskommando</i>) wants this condition further explained. If access to the fjord is closed, it will make search and rescue more difficult in the area for the Armed Forces.</p>	<p>There is no need to close the access to Gamborg Fjord, but there may be a need to limit or impede access to the fjord for a shorter period.</p> <p>There will be no physical barrier, so rescue vessels will be able to cross construction site at any time.</p>	<p>The Danish Energy Agency has no more comments on this issue.</p>
<p>Citizens</p>			
47	<p>Therefore, we have suggested a new pipeline route, we are attaching sections of the Energinet's web map, on which we have drawn a suggestion for another pipeline route. We are well aware that we live by Natura2000, but we also hear that exemptions have been granted for some of the areas, this could maybe also be possible in ours, depending on how large an area will be affected, if it provides for a</p>	<p>A pipeline route along with the existing gas pipeline north of the bridges has been investigated and has been ruled out as an alternative route, as expansion of both urban areas and infrastructure on both sides of Lillebælt makes an extra pipeline impossible.</p> <p>Potentially routing the pipeline through the Natura 2000 area "Little Belt" was also investigated. Refer to response no. 21.</p>	<p>The Danish Energy Agency has no more comments on this issue.</p>

	better solution the laying of the gas pipeline. We are well aware that working in water will make the project more expensive, but if it will ultimately affect landowners and others less, the water route should be considered. Two proposals for new pipeline routes, including going out in Lillebælt.		
Kolding			
48	<p>Lillebælt</p> <p>In the environmental impact report, it states that Energinet has plans to lay rocks at Baltic Pipe where necessary for further protection of the gas pipeline. Kolding Municipality encourages rocks to be laid in the form of stone reefs with regard to the marine environment despite the need for protection of the pipeline. Stone reefs can be placed by the pipeline, but may have more effect in other places where rocks were there originally.</p> <p>There were previously several stone reefs in Lillebælt, but most have been overfished over time. Stone reefs were previously established at GI. Port in Middelfart and during the period of 2019-2021, a preliminary survey will be done and two large stone reefs of 10 ha each will be established by Kolding and Middelfart Municipalities. Stone reefs laid by Energinet on the Jutland side and Funen side where the Baltic Pipe will be laid will be able to support these stone reefs and generally contribute to increased biodiversity and an improved marine environment.</p>	<p>Energinet has previously informed Kolding Municipality that Energinet does not intend to perform significant activities beyond what the environmental impact report identifies as necessary. Energinet maintains this position, but notes the comment.</p> <p>Energinet is in dialogue with Naturpark Lillebælt with regard to identifying synergies between the projects that could help the mentioned projects within the framework Energinet can navigate within, for example, through joint purchase of materials to get better prices. Energinet is in ongoing dialogue with Naturparken on this - Kolding Municipality is represented in Naturparken.</p>	The Danish Energy Agency has no more comments on this issue.
49	<p>The construction activities by Lillebælt will last up to 10 months, and nearest residents to the construction projects in Middelfart and Kolding Municipality, as well as guests at GI. Ålbo Camping site on the Jutland side, will be subjected to noise for periods that exceeds the regulated noise limits from construction work at night. Very noisy construction activities from hitting sheet piling walls where the pipeline is laid on land on both sides of the belt will be performed during daytime hours on weekdays in May 2020.</p> <p>Kolding Municipality encourages there to be a further dialogue on the above and that you pay particular attention to information from neighbours in the area.</p>	<p>The municipality's comments are noted and included in the further dialogue with Kolding Municipality.</p> <p>The commercial area will be discussed in dialogue with the municipality. The pipeline itself is outside the commercial area.</p> <p>The construction work around GI. Ålbo Camping is done in dialogue with neighbours and the company.</p>	The Danish Energy Agency points out that a condition has been added that the same conditions apply for construction works at sea in Little Belt as for the land-based part in the art. 25-approval according to the Environment Assessment Act (EIA permit) from the Environmental Protection Agency for the Baltic Pipe project, chapter 3, paragraph 4 about noise.
50	The marine environment in Lillebælt is unique to Denmark, so Kolding Municipality would generally encourage Energinet to fully compensate for the degradation of the marine environment that the project's pipeline route will entail.	The environmental impact report states that with certain mitigation measures (re-establishment), there will not be significant damage to the marine environment. There is no justification for requiring compensatory measures for short and reversible impacts that are not assessed to be significant, and Energinet thus does not believe that further measures can be required, as Kolding Municipality requests.	The Danish Energy Agency has no more comments on this issue.

51	<p>Energinet plans to use gravel in the size of 5-15 cm for the degradation around the pipeline in the excavation. With the strong current in Lillebælt, in Kolding Municipality's opinion, it will require that some larger rocks be laid as a cover layer to avoid erosion and removal of the gravel. With regard to rock size, in the planning of other stone reef projects in Lillebælt we have used rocks between 30 – 80 cm, as this size ensures that they can withstand the growth of macroalgae on the rocks without the current moving them. Kolding Municipality encourages using a rock size between 30-80 cm in a cover layer around the pipeline so that it can also function as a stone reef.</p> <p>Stone reefs laid by Energinet on the Jutland side and Funen side where the Baltic Pipe will be laid will promote the biodiversity and increase the food resources for fish and birds. It will also support the municipality's planning of stone reefs in the area via Naturpark Lillebælt and an ongoing EU LIFE project in Lillebælt. Kolding Municipality would therefore like to participate in further coordination. Kolding Municipality is participating in an EU LIFE project that includes establishment of stone reefs. The municipality expects the construction period for stone reefs in the LIFE project to roughly coincide with the construction period for Baltic Pipe (August-September 2020), where there will be re-establishment with rocks. Kolding Municipality would therefore like to participate in further coordination of the construction activities so that we can utilise possible synergies. It is important to coordinate early in the process here, as the planned activities require in-depth surveys and permits, where the case processing can be long and time-consuming. The material that is excavated/sucked up in connection with establishment of the pipe trench will be able to be recovered instead of dumping it at the site by Trelde Næs as planned. The suitable part of the material will be able to be recovered for sand feeding at various locations along the coast in the municipality. Kolding Municipality encourages coordination with regard to schedules and possibilities.</p>	<p>Laying of gravel: See response to Middelfart Municipality no. 31.</p> <p>Stone reefs: The environmental impact report also assesses the project with regard to there not being a significant degradation of the project area's environmental function. The conclusion is that with certain mitigation measures, the same environmental value can be ensured within a short period after the construction work is complete. Energinet does not believe there is justification for imposing stricter requirements than that.</p> <p>Recovery: Energinet has submitted an application for a dumping permit to the Danish Environmental Protection Agency on 29/04/2019. This starts a process where it is investigated whether there are projects that can use the sediment rather than dumping it. However, before the application was submitted, there was dialogue about coastal protection by Binderup Strand (with Kolding Municipality) or for establishment of bird islands in Lillebælt (with Naturpark Lillebælt, as part of their LIFE project).</p>	The Danish Energy Agency has no more comments on this issue.
52	<p>In the stretches where establishment and re-establishment of the excavation for the pipeline will affect eelgrass, the municipality encourages Energinet to fully re-establish the eelgrass. This applies to both the excavation trench itself and the impact on the eelgrass that an increased resuspension in connection with excavation work would entail.</p> <p>The municipality wants to gain access to data from the monitoring programme.</p>	<p>Energinet has previously informed the Municipality that Energinet does not intend to perform significant activities beyond what the environmental impact report identifies as necessary. Energinet maintains this position, but notes the comment.</p> <p>There are currently existing projects on establishing several eelgrass areas in Lillebælt. Energinet is thus in dialogue with Naturparken on this.</p>	The Danish Energy Agency has no more comments on this issue.

Danmarks Fiskeriforening (Danish Fishermen)			
53	<p>Lillebælt</p> <p>A wide variety of fishing takes place in Lillebælt throughout the year with vessels over 12 metres, but particularly vessels under 12 metres, which means that the VMS plot is not correct for the actual fishing activity in the belt. As is also stated in the report, the area where you want to establish the pipeline is very hilly with very steep slopes and very strong current for some periods. In addition, when going past Fænø as the project describes, you want to go into eelgrass belts that are particularly vulnerable in this area due to the strong current. The eelgrass beds will be very difficult to re-establish in the area due to the strong current. The fishermen in the area are convinced that these conditions will prove to be a major problem for the location of the pipeline in the seabed, as the pipeline will become exposed by the strong current over time and will thus create problems for the fishing in the area. There is currently a power cable in the same area, as is also described in the project description, and with this cable there are problems with the covering in the seabed precisely because the slopes are as steep as they are. In periods where there is a very strong current, material could potentially be washed away. It is the fishermen's perception that crossing Lillebælt itself would be much more appropriate to establish further south in Lillebælt in the area from Skibelund Strand/Frydenbord Strand over to the bottom of Tybrind Vig. This avoids the strong currents and the steep slopes and the pipeline will be able to be laid in a much more stable seabed here. The same recommendation was also given in our response in January 2018.</p> <p>The location the fishermen and DFPO recommend is located in the Lillebælt Natura2000 area, but this does not mean that a project like Baltic Pipe cannot be established right here. There are a number of specific designation bases for the area that have to be considered, but once this is clarified, the project would be much better located farther south in Lillebælt than the current proposal. By moving the project down to the Natura2000 area as advised, there will also be a significantly shorter route for the gas pipeline. A significantly shorter pipeline would help reduce the overall footprint of the project on the environment along the cable route, the eelgrass would also be easier to re-establish in this area due to the much weaker current in the area. There are a large number of projects in Danish Natura2000 areas that were implemented with regard to the protection considerations required by the areas.</p>	<p>Energinet can rule out the pipeline being exclusively located in the eelgrass areas south of Fænø but cannot remove the area from the project area, as there may be a need for a less temporary platform in connection with installation of the gas pipeline from a barge etc., which will then only affect a very small part of the eelgrass areas south of Fænø. The issue is covered by the environmental impact report.</p> <p>Energinet is in negotiation with fishermen for lost profit in accordance with the Danish Fisheries Act (<i>fiskeriloven</i>) § 78.</p> <p>Energinet can state that the pipeline will not be buried and thus filling and laying of rock will only be for filling the pipeline trench. Laying of rock is currently coordinated with NaturPark Lillebælt, Kolding and Middelfart Municipality. The covering is partly done with gravel and as the pipeline is located across the direction of current, there are not expected to be the same problems in terms of remaining filling of the pipeline trench as was seen with the Fænøsund cable (that was referred to).</p> <p>Through sub-consultants, Energinet has been in dialogue with local fishermen, including relevant local associations, precisely to identify fisheries with smaller vessels. The assessment in the environmental impact report is therefore considered correct for the known commercial fisheries in the area.</p> <p>Natura2000</p> <p>A pipeline route along with the existing gas pipeline north of the bridges has been investigated and has been ruled out as an alternative route, as there has been an expansion of both urban areas and infrastructure on both sides of Lillebælt, which makes an extra pipeline impossible.</p> <p>Potentially routing the pipeline through the Natura 2000 area "Little Belt" was also investigated. Refer to response no. 21.</p>	The Danish Energy Agency has no more comments on this issue.
54	<p>Bottom trawling fishermen in the project area will be significantly affected during the construction period and with as major an intervention as the project entails, it will be very likely that it will take several years for the conditions to become normal again. The</p>	<p>In relation to the question of over-fishing, a reference is made to the Environmental Protection Agency's basis study for the Marine Strategy 2012. There is a general consideration referred to in the environmental impact report. More specific data is used in connection with the assessment of impacts from commercial fisheries and fish populations.</p>	The Danish Energy Agency points out that a condition has been added that an agreement between Danish Fishermen and Energinet

	<p>fishermen shall be fully compensated for their lack of opportunity to fish.</p> <p>It is mentioned in the report that overfishing contributes to there not currently being good environmental conditions in Lillebælt. DFPO would like to know which species this specifically concerns?</p> <p>The placement of rocks on top of the pipeline should only occur in collaboration with the fishermen conducting their fishing in Lillebælt, as fishing grounds risk being destroyed, particularly if the rocks are laid on an otherwise relatively smooth seabed.</p> <p>As also stated in the report, activities from vessels over 12 metres have been very low, if only in recent years. However, if you go back further, you will see that there have been significant fishing activities throughout Lillebælt. The fishing is entirely dependent on the population situation for individual species and management, but the expectation is that there will eventually be significantly greater fishing activities again compared to the level today. Therefore, it cannot be ruled out that the pipeline with the protection zone will have significant consequences for the fishermen who fish in Lillebælt.</p> <p>It is essential that fishermen can operate above the pipeline, and that exemptions from the Kabelbekendtgørelsen (Order Regarding Protection of Submarine Cables and Submarine Pipelines) are granted so that it is possible to freely carry out fishing activities above the pipeline after the construction has finished.</p>	<p>It is assessed in the environmental impact report that there will be a significant impact on local bottom trawling fisheries in the construction corridor if the construction work is done during the period of 1 August to 1 November when eel fishing is permitted. In a worst-case scenario, the impact could mean up to 10-15% loss of the total annual catch value for the year in which the construction work is implemented. Commercial fisheries have the opportunity to receive compensation for the loss in accordance with the provisions of the Danish Fisheries Act (<i>fiskeriloven</i>).</p> <p>No restrictions are immediately expected with regard to future fishing activities, as the pipeline is covered with rock gravel. With regard to rock covering, the note on "relatively smooth seabed" is difficult to immediately transfer to Lillebælt. There are no plans to include fishermen in the design of the rock covering.</p>	<p>must be submitted to the Danish Energy Agency when available but no later than the start of construction of the pipeline.</p>
<p>Ålbo Camping</p>			
<p>55</p>	<p>My clients also have concerns about the operating phase as discussed in section 6.10.4 of the environmental impact report. – including the degree to which guests who do not choose the site in 2020 returning in the following years. This concern must also be viewed in the context of my clients not feeling confident that the sediment spreading from the construction work will not result in an adverse effect on the marine habitat type's area, structure and function --- will the area be unattractive to divers and anglers, which will be destructive to the camping site's specialised operation?</p>	<p>Energinet is very aware of the company's challenges in relation to the project and is in ongoing dialogue with GI. Ålbo Camping.</p> <p>Energinet has had the Danish Hydraulic Institute (DHI) make models of how the sediment is spread in Lillebælt during construction work. This work is thoroughly described in section 6.3 of the environmental impact report. This states that there will be higher concentrations of sediment found in the water phase during the excavation work. Outside the construction corridor, the average concentrations added from the construction work are estimated at 3 mg/L, while for shorter periods (up to 2 days) there will be increased concentrations within the work area of up to 20 mg/L. This is thus a geographically and temporally limited impact and therefore not significant.</p> <p>Excavation of the pipeline trench is expected to take 5 weeks, so this will be a temporary and reversible impact. Energinet will include this in the dialogue with GI. Ålbo.</p>	<p>The Danish Energy Agency has no more comments on this issue.</p>
<p>Association</p>			
<p>56</p>	<p>Svinø Bådelaug, which is located in Ellebæk Vig by Gamborg Fjord, can in no way accept access to Gamborg Fjord being closed for a two-month period. This would mean that our members and their approximately 100 boats cannot sail out and will only be able to sail in Gamborg Fjord for most of next year's sailing season.</p>	<p>There is no need to close the access to Gamborg Fjord, but there may be a need to limit or impede access to the fjord for a shorter period.</p> <p>The developer is contacting both Svinø Bådelaug and Middelfart Marina to communicate about this.</p>	<p>The Danish Energy Agency has no more comments on this issue.</p>

	We understand that the work of laying the pipeline under Lillebælt will affect the sailing in the belt, but we cannot accept access to Gborg Fjord being completely closed.		
Citizens			
57	It became clear at the recent information meeting in Middelfart that the planners have tried to avoid going through the Natura 2000 protected area. This has resulted in a project where you will run the pipeline through one of the deepest sea areas in Danish waters (up to 85 m) with a rapid current by using a complicated laying method of pulling the pipeline through the water. This will result in the pipeline being located in a place where it is very difficult to inspect and possibly repair the pipeline due to the great depth and the covering will also be difficult to do because of the great depth. This must be considered to be of significant importance to safety and operating costs.	<p>The bottom topography of Lillebælt means that the pipeline is pulled over a 4-kilometre strait with water depths between 0 and 42 metres. This makes establishment difficult but has no impact on the operation of the pipeline.</p> <p>It is unclear what is meant here by safety. If this is the safety of the pipeline, refer to the prepared risk assessments. If anti-terrorism is meant here, refer to the general response below:</p> <p>The gas pipeline and associated installations are part of the Danish transmission network and are constructed and operated under very strict security requirements. The transmission network is the 'gas system highway' comprising the system that conducts natural gas from the North Sea to the distribution network. The distribution network constitutes the connection to the customers and is closest to the consumers. The gas transmission pipelines and the facilities connected to gas transmission in Denmark are constructed in accordance with legislation and standards that ensure a very high safety level. Choice of materials, dimensioning and construction are based on extensive experience in Denmark and internationally, which forms the basis for the legislation and standards the work is done under. Therefore, accidents have never occurred in the Danish transmission network, which has existed for over 40 years. The accidents and gas spills reported in the media typically occur in the distribution network as a result of local construction work that damages the distribution network's much smaller pipes.</p> <p>Energinet continuously assesses its electric and gas facilities with regard to the risk of terrorism. Energinet has a positive and close cooperation with the Danish intelligence services, both the police intelligence service and the Armed Force's intelligence service. The cooperation has not given rise to concerns about the Baltic Pipe project. The energy infrastructure is not assessed to be a terrorist target by the intelligence services and there are no known examples of terrorist activities against energy facilities. Attacks on this type of facility occur in connection with conventional war and not terrorism. As part of its regular operations, Energinet operates with security and access requirements in connection with installations in Nybro, Egtved and near the upcoming compressor station. There is thus only access for staff and authorised visitors.</p>	The Danish Energy Agency has no more comments on this issue.
58	This is in addition to the environmental considerations. The facility is of course stationary and as far as we know there are no noise or odour disruptions once it has been established and the surface is fully restored. Therefore, the seabed is affected to the same low degree as would happen on land, and the number of expropriations would be significantly lower if the construction is done in the sea to the greatest extent possible.	Refer to response no. 1.	The Danish Energy Agency has no more comments on this issue.
59	Therefore, we protest the chosen pipeline route and propose that the project be restructured so that the majority of the gas pipeline is laid in the sea and preferably in shallow areas where the safety is best and access for inspection and repairs is as good as possible.	Refer to the above answer for a general response on pipeline routing.	The Danish Energy Agency has no more comments on this issue.

60	We have filed an objection to the project as we already know it is pointless – BUT we are very concerned about all the noise and light pollution that will occur both during the day and on the water at night.	The noise in and around Lillebælt is handled by noisy activities on land being done during normal working hours between 7 a.m. and 6 p.m. on weekdays. Noise from activities on land during the other periods will be muffled to a maximum of 40 dB by the nearest residence. Noise contributions from the sea side will only exceed 40 dB by the nearest residence for short periods, as the noise comes from vehicles moving along the pipeline trench.	Refer to the answer under no. 49.
61	Proposal for other pipeline route at sea.	A pipeline route along with the existing gas pipeline north of the bridges has been investigated and has been ruled out as an alternative route, as there has been an expansion of both urban areas and infrastructure on both sides of Lillebælt, which makes an extra pipeline impossible. It has been investigated whether there is a possibility of running the pipeline through the “Lillebælt” Natura 2000 area. Refer to response no. 21.	The Danish Energy Agency has no more comments on this issue.
62	Alternatively, moving the gas pipelines further south may solve the problems, as it will not affect the residential area.	See the above answer under 61.	The Danish Energy Agency has no more comments on this issue.
The Danish Maritime Authority (Søfartsstyrelsen)			
63	For the part of the Baltic Pipe to be constructed at sea, the Danish Maritime Authority's () interests from the meetings already held etc. will be taken into account, sailing risk analyses will be conducted and the attached Executive Order and assessment form will be complied with. References to the attached Executive Order and assessment form can preferably be written into the conditions of the establishment permit e.g. section 4.7.3 and 4.7.5.	Energinet is familiar with the procedure and follows it as stated.	The Danish Energy Agency points out that a condition has been added that the contractor must abide by the demands of the Danish Maritime Authority relating to how the project is carried out, its operation and dismantling.
Environmental Protection Agency			
64	Comments for Lillebælt: 1. To the extent possible, it is recommended that the pipeline routing and pipe laying method be chosen based on a criterion of least possible environmental impact, including impact on any NOVANA measuring stations. However, this is also implied in section 7.1 on mitigation measures, where it specifies e.g. that “It should be attempted for the pipeline to be established outside the coastal eelgrass and stone reef areas south of Fænø, which will only lead to impact on these habitat types by the landfalls on the Funen and Jutland side and thus a smaller part of the total areas with eelgrass and stone reefs in the survey corridor.”	As the environmental impact report was prepared against the background of the actual project, using the construction within the stated project area as the starting point, Energinet does not see any grounds for preparing an addendum to the environmental impact assessment. Energinet can confirm that the pipeline is not routed through the eelgrass areas south of Fænø.	The Danish Energy Agency would also like to point out that Energinet, under the terms set, must ensure that the pipeline is set up outside of the eelgrass and stone reef areas near to the coast south of Fænø in a way that minimises impact as much as possible.
65	2. The Danish Environmental Protection Agency would like to be notified when work is being carried out in Lillebælt (Little Belt), so that this can be taken into consideration when the NOVANA monitoring programme is underway.	This can be accommodated.	The Danish Energy Agency points out that is a condition of the approval that Energinet must abide by the demands of the Environmental Protection Agency relating to how the project is carried out and its operation.

66	<p>3. The environmental impact assessment highlights the current ecological and chemical conditions in the affected bodies of water with regard to the body-of-water-plans Environmental GIS. There is not, however, any reference to the actual environmental target criteria (classes between quality thresholds) for the respective quality elements, which is why the view is taken that there is insufficient support for the opinion that the project does not adversely affect conditions and does not prevent the target of sound ecological and chemical conditions from being met. For this reason, the overall view taken appears too general in relation to the plans for the bodies of water (6.15.3.1.3) and does not assess any adverse effect.</p>	<p>The plans for the bodies of water were evaluated against the background of descriptions and assessments of the impact on the sea bed and sediment spread, benthic flora and fauna etc. in other sections of the report. Furthermore, the sediment's contents have been described and evaluated in terms of nutrients and environmentally dangerous substances.</p> <p>No nutrients or environmentally dangerous substances will be supplied to the body of water during the project. In other words, the only impact on the quality elements will be the purely mechanical impact on the sea bed when digging/setting up the gas pipeline, plus the indirect effect that swirling sediment with a certain nutrient and environmentally dangerous substance content may have by releasing sediment-bound nutrients and environmentally dangerous substances. For Lillebælt, it is also about what impact any dredging of excess sediment would have.</p> <p>Against the background of figures from the Danish Nature Agency's investigations, it was decided that the sediment has modest nutrient and environmentally dangerous substances content. After the application for dredging work was submitted to the Danish Environmental Protection Agency, the Agency subsequently also decided that the sediment is so pure that there would be no need to take sediment samples for analysis purposes.</p> <p>Against that background, NIRAS, who are Energinet's advisor, decided that the aforementioned descriptions and assessments already sufficiently highlight the impact from the project on the targets in the plans for the bodies of water, and as such that a more detailed review of the quality elements in relation to the environmental target criteria would be unnecessary.</p> <p>As far as the wording is concerned, i.e. that the project will not adversely affect conditions in the bodies of water, NIRAS takes the view that the decision implies that the project has no significant impact on the plans for the bodies of water. If it had been decided that the project would have adverse effects, i.e. such that classifications for the body of water would be downgraded on one or more of the parameters, this would have been deemed a considerable impact.</p>	<p>The Danish Energy Agency has no more comments on this issue.</p>
67	<p>4. In connection with the above, it must also be pointed out that the plans for the bodies of water' assessment of benthic invertebrates as a quality element is done using the Danish Quality Index (DKI), which is why the environmental impact assessment's assessment of the benthic fauna appears general.</p>	<p>The Danish Quality Index (DKI) can only be applied to soft benthic fauna collected using a set methodology (certain number of samples using certain methods). This is necessary in order to gain a quantitative result that can be used in a certain calculation. No benthic fauna samples were taken in connection with Baltic Pipe, because it was decided that it would be enough to describe the existing soft benthic fauna population in the project area based on data from a nearby monitoring station, as shown in figure 6.17 of the report (station no LBBR0017 - the Danish Environmental Protection Agency) and investigations in N2000 habitat area no 96, in Lillebælt just south of the project area.</p> <p>Field studies in relation to Baltic Pipe mainly focused on securing that the most sensitive habitat types (eelgrass and reefs/hard seabed areas) were mapped precisely, as they are the most complex and sensitive habitats to impact with the longest recovery time.</p> <p>In hard bed habitats (hard benthic bottom/stone reef), qualitative lists of species (observed species) were compiled together with an overall quantitative description (individuals, common, predominant) of the species observed. It is not possible to create a DKI index based on this data.</p> <p>Section 6, bed flora and fauna, describes loss of habitat, covering the sea bed with sediment and spread of sediment, as well as other disruption of the species living on the sea bed, as a result of the Baltic Pipe</p>	<p>The Danish Energy Agency has no more comments on this issue.</p>

		<p>project. A description and assessment of the re-establishment and restoration process for the different types of nature in the project area, and for recolonisation of the flora and fauna, are provided.</p> <p>Against this background, NIRAS decided that the impact of the benthic invertebrates from the project has been highlighted sufficiently to be able to assess the impact in relation to the quality element in the plans for the bodies of water.</p>	
68	<p>5. The impact from environmentally dangerous substances (EDS) is assessed in the environmental impact assessment if environmental quality standards are stipulated by law and action levels are given in the dredging guidelines. The latter are applied when assessing dredging and do not in themselves constitute criteria under which the targets from the Water Framework Directive and Marine Strategy Framework Directive are to be set. One suggestion may be to include criteria/threshold values for EDS, to be applied under the auspices of OSPAR and HELCOM.</p>	<p>As described in the report, the project will not introduce any environmentally dangerous substances (EDS) to body of water. The description of the sediment's EDS content reflected the Danish Nature Agency's monitoring of EDS in the area, and comparing this with the action levels in the dredging guidelines will ensure that the sediment's EDS content does not exceed the average background level, which itself is not expected to have any effect, according to the Danish Environmental Protection Agency website. There are no direct sources of EDS close to the project area (direct discharges, ports etc.) As the project in itself will not introduce any EDS to the body of water, the level of contamination affecting the sediment is not expected to change. After the application for dredging work was submitted to the Danish Environmental Protection Agency, the Agency also decided that the sediment is so pure that there would be no need to take sediment samples for analysis purposes.</p> <p>Any impact that may occur will be from EDS potentially released to the aqueous phase from the swirling sediment. As described in the report, this impact will be short-term and, against the background of the hard-bed content of EDS in the sediment, limited in scope.</p> <p>Against this backdrop, NIRAS decided that the EDS impact of the project has been highlighted sufficiently – including an adequate description of the sediment's EDS content.</p>	<p>The Danish Energy Agency has no more comments on this issue.</p>

Consultation responses – Baltic Sea

No.	Public Consultation Response	Response GazSystem (Rambøll)	Response the Danish Energy Agency
The Viking Ship Museum			
69	The Viking Ship Museum's statement here states that there are no comments on the information put forward regarding ancient monuments on the sea bed in the Baltic Sea. The environmental impact report provides an excellent account of the current and future maritime archaeology measures that will be necessary prior to the construction work.	-	This has been noted.
70	However, a timetable of preliminary maritime archaeology investigations that is no longer valid appears at different points of the report and the other documents; it may be possible to correct this.	<p>New up-to-date timetable (subject to minor adjustments):</p> <ul style="list-style-type: none"> • August 2017–November 2018: Geophysical and geotechnical sea bed investigations. • August 2018–April 2019: ROV video inspections of man-made objects on the sea bed, including potential cultural artefacts. • July 2018–spring/summer 2019: The Viking Ship Museum: Archaeological assessments of investigation findings, incl. potential Stone Age relics. Consultations with the Viking Ship Museum's 'Slots- og kulturarvsstyrelsen' (Castle and cultural heritage committee). • Summer 2019: Potential, where relevant, Viking Ship Museum ROV/diving operation along the chosen BP route. • Summer 2019: The Viking Ship Museum: Archaeological report <p>Furthermore:</p> <ul style="list-style-type: none"> • Preliminary construction phase/construction phase: Investigation of anchor corridor. • Construction phase: If artefacts are found, STOP the work immediately and notify the Viking Ship Museum/Castle and cultural heritage committee. 	This has been noted.
71	It must also be noted that the provisions of the Museum Act will be applicable to all activities derived from the project, so it is not a given that the investigations carried out so far will cover a sufficient area; for example, in the event of a pipe fitting vessel being used, requiring anchors to be set down.	To be noted.	This has been noted.
72	Reference is also made to Section 29h(1) Museum Act, according to which any traces of ancient monuments or wrecks found during construction work must be immediately reported to the Danish Agency for Culture and Palaces, and work is to stop.	To be noted.	This has been noted.
Citizens			
73	At best, a route around Denmark as described at the meeting in Odense could be considered. However, according to the proponents of the project, this solution would be much more expensive.	Refer to response no. 1.	The Danish Energy Agency has no more comments on this issue.
The Danish Fisheries Agency, Fiskeriinspektorat Øst Ringsted (Fisheries Inspectorate East Ringsted)			
74	The Danish Fisheries Agency, Fiskeriinspektorat Øst Ringsted (Fisheries Inspectorate East Ringsted) has no comments to make at present.	-	This has been noted.

Nord Stream AG			
75	Against this background, Nord Stream AG does not currently have any objections to the construction work on the Baltic Pipe project. Baltic Pipe will intersect the route of the existing Nord Stream AG pipeline. Baltic Pipe, and in particular Polish company Gaz-System S.A., which is responsible for the section crossing the existing Nord Stream route, have entered into dialogue with Nord Stream AG to discuss this intersection. It would be appreciated if the dialogue through the project planning phase of the initial phase of the Baltic Pipe project can be open and constructive. The parties are aiming to enter into an agreement on the intersection.	-	This has been noted.
76	NSP operates two of the 48 "natural gas pipelines in the Gulf of Finland that intersect with the Baltic Pipe Project. The existing pipeline system's operational life is expected to be at least 50 years from 2011 and 2012 respectively.	-	This is a comment that does not require a response.
77	Nord Stream AG has the permits required to operate the pipeline system and to conduct the investigative activities that will guarantee the integrity of the pipelines.	-	This is a comment that does not require a response.
78	NSP and Baltic Pipe are in dialogue with a view to making an agreement on the intersection, i.e. the location of the future intersection, and the design, construction and operation of the pipelines.	GAZ-SYSTEM S.A. is in ongoing dialogue with Nord Stream AG to ensure that the necessary agreements are made for the intersection. These agreements will cover the location of the future intersection, including the design, construction and operation of the pipeline. In cases where the infrastructure is not in place or not operating, the normal practice is for the intersection agreements to be revised to be consistent with this and ensure that both parties' interests have sufficient protection. In particular, arrangements are to be made to identify and rectify circumstances in which it may be necessary for both parties to conduct construction activities close to the pipeline intersection at the same time.	<p>The establishment licence states that the developer must enter into agreements with the owners of the cable and pipeline systems that will intersect with the pipeline. The aim of such agreements would be to ensure that the owners are indemnified as a result of the intersection.</p> <p>The developer must take out insurance that would compensate for any damage done during the activity carried out according to the permission, even if the damage is accidental.</p> <p>Furthermore, the developer must submit their choices of design and methods in connection with the intersection of the other infrastructure to the Danish Energy Agency for its approval after making</p>

			agreements with the owner of the infrastructure that will be intersected but do so before the pipeline is decommissioned.
79	<p>If the scheduled activity window for Baltic Pipe and NSP is to coincide, both parties must ensure the following:</p> <p>A.) that the schedule for their activities accommodates the other shipping traffic related to marine activity to ensure marine safety. In the event of an emergency situation, the maritime traffic linked to any emergency situation in the existing pipeline system must be prioritised.</p> <p>B.) that the design of the Baltic Pipe pipeline is suitable for the intersection with existing NSP pipelines.</p>	Please refer to the answer at no. 78.	Please refer to the answer at no. 78.
80	<p>If no intersection agreement is concluded with Baltic Pipe (GAZ SYSTEM S.A.), NSP would recommend that the following be factored into the permission issued to Baltic Pipe:</p> <p>A.) Baltic Pipe shall agree the design and installation deliveries for the intersection work with NSP before the start of the installation.</p> <p>B.) The angle of the intersection point between the pipeline in the Baltic Sea and the NSP pipelines must not be less than 300° and, at most, as close to 900° as possible.</p> <p>C.) The vertical separation between pipelines in the Baltic Sea and the NSP pipelines must measure three hundred millimetres (300 mm) at least. This vertical separation must be guaranteed when using a physical barrier, e.g. a concrete mattress.</p>	Please refer to the answer at no. 78.	Please refer to the answer at no. 78.
81	<p>D.) The design of the Baltic Pipe pipeline in the Baltic Sea shall:</p> <ul style="list-style-type: none"> • reflect the local sea bed conditions in their entirety; • reflect the volume of stress loads that will impact the NSP pipelines, induced by the Baltic Pipe pipeline; • demonstrate that the Baltic Pipe pipeline and/or other support materials are receptive to subsidence that might increase the loads on the NSP pipelines to an unacceptable level; • consider the maximum load in the event that the Baltic Pipe pipeline is unintentionally flooded. <p>E.) The Baltic Pipe pipeline shall, wherever possible, be placed between two permanent anodes on the NSP pipelines. Where this is not possible, a minimum separation distance of 15 metres (15 m) shall apply. This design must consider the stated installation tolerances, e.g. a set installation tolerance of +/- 2.5 m. The separation between the Baltic Pipe pipeline and the anodes on the NSP pipelines must be at least seventeen-and-a-half metres (17.5 m) in length.</p>	Please refer to the answer at no. 78.	This has been noted. See also the comments in consultation response 78.

82	<p>F.) If the Baltic Pipe pipeline contains anodes, these must be placed as far as possible away from the NSP pipelines (i.e. the intersection point must be the midpoint between two anodes on the Baltic Pipe pipeline).</p> <p>G.) If the pipeline for Baltic Pipe requires corrosion protection, it must have a sacrificial anode system mounted on it. Baltic Pipe must submit proof showing that their described cathodic system of protection with sacrificial anodes does not impact Nord Stream's cathodic system of protection with zinc anodes in the area of the planned crossing point.</p> <p>H.) The Baltic Pipe pipeline must, where possible, avoid the placement of joints on NSP pipelines. In all circumstances, the design must demonstrate that joints are not in danger of causing damage.</p> <p>I.) The design must ensure that the Baltic Pipe pipeline is stable, sufficiently protected and does not increase the risk of damage to the NSP pipelines to an unacceptable level.</p> <p>J.) Where the Baltic Pipe pipeline crosses the NSP pipelines, the design must ensure that the Baltic Pipe pipeline is not susceptible to impacting fishing activities.</p>	Please refer to the answer at no. 78.	This has been noted. See also the comments in consultation response 78.
83	<p>K.) The material for the placement of rocks must be constructed so that it is compatible with the local environment and must not be susceptible to deterioration and must have a maximum diameter of one hundred and twenty-five millimetres (125 mm). The placement of rocks must not change bottom currents, which could have an impact on the integrity of the NSP pipelines (e.g. increased free-span)</p> <p>L.) Anchoring must not be permitted within two hundred metres (200 m) of the NSP pipelines.</p> <p>M.) Where anchor chains cross the NSP pipelines, the minimum horizontal distance between the anchor and the two crossed pipelines (in the span line) must be four hundred metres (400 m).</p> <p>N.) Where anchor chains cross the NSP pipelines, the minimum vertical distance between the anchor chain and the top of the NSP pipelines must be 30 metres (30 m).</p> <p>O.) The design must include a quantitative risk assessment (QRA) which must be carried out in accordance with an industry-recognised standard, such as DNV-GL RP F116 or similar.</p>	Please refer to the answer at no. 78.	This has been noted. See also the comments in consultation response 78.
84	<p>P.) The QRA must demonstrate that the Baltic Pipe pipeline represents an acceptable risk level for the NSP pipelines. The acceptable risk level must be in accordance with the DNVGL OSF101 standard.</p> <p>Q.) The design of the Baltic Pipe pipeline route must avoid all munitions within 300 m of the NSP pipelines with a minimum distance of 25 m. The design must outline the specified installation tolerances for the Baltic Pipe pipeline, e.g. a specified installation tolerance</p>	Please refer to the answer at no. 78.	This has been noted. See also the comments in consultation response 78.

	of +/- 10 m in the separation between the Baltic Pipe pipeline and munitions of at least thirty-five metres (35 m). For the sake of clarity, the Baltic Pipe pipeline is defined as any other material infrastructure that has cause to be installed on the seabed (e.g. including material for the placement of rocks).		
85	We ask you to please keep us updated on future developments for this project.	Please refer to the answer at no. 78.	This has been noted. See also the comments in consultation response 78.
Citizen (Avodan)			
86	<p>My clients protest against the project, because it will, to a very large extent, impair their ability to fish in the fishing grounds off of which they have lived for many years.</p> <p>This is particularly the case for the areas of Rønne Reef, Faxe Bay and the western part of the Baltic Sea. In the view of my clients, the project would destroy significant breeding grounds for sand lances in Rønne Reef and in Faxe Bay.</p> <p>There are no other areas in the Baltic Sea in which to catch sun lances, now that Kriegers Flak has been closed off.</p> <p>The experiences gained from the Kriegers Flak power cable are worrying. For example, no clarification has been given with regard to when it will potentially open up once more for fishing. No matter whether the gas pipeline is entrenched or placed on the seabed, the ability to fish is destroyed to a high degree.</p>	<p>The environmental assessment has been based on the impact on the commercially most significant fishing activities in the 2010-2015 period. Additional data from the 2016-2018 period supports the fact that sun lance fishing is not a commercially significant type (Appendix 2). The project recognises that sun lance fishing does occur in the named areas, particularly in Faxe Bay and in the western part of the Baltic Sea and may be important to individual fishermen. Data (VMS and logbook data) show that sun lance fishing in the areas fluctuates to a large extent each year which means that the yield varies greatly from year to year.</p> <p>It is likely that there will be less of an impact on sun lance fishing in the construction phase (if sun lances are being fished in the construction year concerned) and in those areas where the pipeline is laying freely on the seabed (and trawling is potentially limited). The project does not agree with the fact that there will be a significant deterioration of fishing activities if the pipeline is entrenched, as it is not known whether trenching will give rise to large rocks on the seabed alongside the pipeline. If the pipeline is laying freely on the seabed, an exemption from the Cable Order, stating that a protection zone of 200 m is to be established, is requested (<i>Kabelbekendtgørelsen</i>, order no. 939 of 27 November 1992 concerning the protection of sea cables and underwater pipelines). Exemption is considered a possibility, as the pipeline is designed to be 'trawlable'. The authorities (The Danish Maritime Authority) will be the ones to determine whether an exemption can be granted pursuant to the Cable Order. If sun lance fishing, as with other types of fishing, is economically impacted by the project, negotiations with regard to economic compensation will be possible.</p> <p>Sedimentation of suspended material and the sedimentation is not worse than what one might expect in normal storm scenarios. Therefore, it is unlikely that this should, for example, have an influence on the particle size distribution in the top sediment layer which is important for which habitats the sun lances choose.</p> <p>Gaz-System S.A. understands that there must be an agreement between the developer and the fishery association, and this must be documented with the Energy Agency prior to the laying down of pipes. Gaz-System S.A. has in this regard planned meetings with the fishery association, which will form the basis for the entering into an agreement between Gaz-System S.A. and the fishery association.</p>	The Energy Agency notes that terms have been inserted requiring the entering into an agreement between the developer and the fishery association which must be documented with the Energy Agency prior to the laying down of pipes.
87	<p>Where the gas pipeline lays on the seabed, it is not possible to carry out trawling. Where the gas pipeline is entrenched, it is also not possible to carry out trawling, because the equipment is ruined by large rocks which have been ploughed/dug up in connection with the laying down of the pipeline and which are not removed along the line of the trench. The rocks destroy the equipment.</p> <p>The rocks can easily be seen on echo sounders. Apart from what impact the building work itself will have on these sun lance breeding</p>	Please refer to the answer at no. 86.	Please refer to the answer at no. 86.

	grounds, it is unknown to my clients what impact the pipeline will have subsequently.		
Citizen			
88	If it is very important to establish a gas pipeline to Poland, which is something I do not have any understanding of, then it is only justifiable to lay it through the Little Belt and the Baltic Sea and not on land, which I will now argue.	Refer to response no. 1.	The Danish Energy Agency has no more comments on this issue.
The Danish Ministry of Defence Estate Agency			
89	<p>Environmental Impact Report for the Baltic Sea</p> <p>It can be seen in the environmental impact report for the Baltic Sea at p. 337 that: "The sensitivity of the military training areas towards this type of impact [temporary safety zone around pipe-laying ships] is assessed to be at a medium level, as the presence of ships will suspend all military activities in the area..."</p> <p>It cannot be accepted that military activities are suspended in connection with the establishment of the pipeline. It is recommended that the establishment of the pipeline takes place within a time frame where no military activities in the area have been planned and that the establishment is coordinated in close cooperation with the defence.</p>	Gaz-System will engage in an ongoing dialogue with the Ministry of Defence during the planning and implementation of the construction works. On this basis, Gaz-System expect that the laying of the pipe can be planned, so that it is carried out without causing any inconvenience to military training activities.	The Danish Energy Agency has no more comments on this issue.
90	<p>Unexploded Ordnance (UXO)</p> <p>On several parts of the pipeline there is a risk of UXO occurrence. Against this background, the Defense Command recommends that another UXO survey be carried out before the work on the seabed starts.</p> <p>The Defense Command is aware that the applicant has coordinated precautions and handling of UXO risks with the Navy's mine clearing service. Coordination directly with the mine clearing service is still possible but it is underscored that the Defense Command must approve the plan for the UXO survey. After approval, the UXO survey may be carried out. After the UXO survey is finalized, a list of potential UXO discoveries will be provided, which will be reviewed by the Navy's mine clearing service.</p>	Gaz-System has had a detailed UXO survey carried out along the entire pipeline route. This has been planned and carried out in consultation with the Royal Navy's Mining Service. Furthermore, the list of potential UXO findings will be reviewed with the Royal Navy's Mining Service.	The Danish Energy Agency points out that a condition has been added that the contractor must abide by the demands of the Military relating to how the project is carried out.

91	<p>It is emphasized that in a potential subsequent phase of the investigation that includes an actual identification of established anomaly/anomalies, a mine team leader from the mine clearing service must be present. Expenses incurred for this are paid by the applicant.</p> <p>The Defense Command points out that in case of verification of leftover ammunition or items that may be dangerous (UXO) the work must stop immediately, and the Joint Operations Center must be contacted, cf. Decree 1351 of 29 November, 2013, art. 14 about shipping safety in relation to construction work and other activities, etc. in Danish waters.</p>	<p>It has been planned pursuant to agreement with the Royal Navy's Mining Service that a mining team leader from the Royal Navy's Mining Service will participate in a subsequent survey where identification of the observed anomalies will take place.</p>	<p>The Danish Energy Agency points out that a condition has been added that the contractor must abide by the demands of the Military relating to how the project is carried out.</p>
92	<p>Besides the above conditions, attention must be drawn to the fact that the granted permissions as well as the contact details for the ship or ships that is/are to carry out the work must be made available to the Joint Operations Centre via the authority granting the permission. If there are any updates for the contact information, they can be forwarded to the Joint Operations Center at these addresses:</p>	<p>It will be ensured that the granted permissions as well as the contact details for the ship or ships that is/are to carry out the work are made available to the Joint Operations Centre.</p>	<p>The Danish Energy Agency points out that a condition has been added that the contractor must abide by the demands of the Military relating to how the project is carried out.</p>
<p>Citizen</p>			
93	<p>Besides the safety, operational and economical risks and disadvantages the pipeline causes on land, there is a considerable risk that the coast and the beach along Strandegård and Feddet will change as a consequence of the project. I find it difficult to imagine that a project of this size will not impact the coast and the beach on both the eastern and western side of the project area. On Feddet, I run the Feddet Beach Camping and Holiday Park and therefore, I would like a guarantee that the width of the beach and the stretch along Feddet, south-east of the project area, will not be negatively changed during and after the project period.</p>	<p>The developer has decided to construct the gas pipeline from land to sea via sub-drilling, precisely to avoid impacts on the coast, including the cliff. It must be expected that the construction activities on the water may result in visible traces of turbulent sediment in some periods, e.g. in relation to the sub-drilled gas pipeline, where it enters the seabed to be coupled with the part of the gas pipeline that is placed at sea. This will happen approx. 0.4 km from the coast. After the construction phase, there will be no impact from the sub-drilled gas pipeline, which lies 4-10 m below the cliff/seabed, and the part of the pipeline which is established at sea (offshore), which lies at a depth of at least 1 m below the seabed. The presence of the gas pipeline is therefore not expected to give rise to influence in the form of, for example, erosion of the cliff and the coast or change in the beach along Feddet Strand camping and holiday park, which is located approx. 1km from the pipeline.</p>	<p>The Danish Energy Agency has no more comments on this issue.</p>
94	<p>In the event that the project is completed, we still believe that the gas pipeline should be placed in a trench in the seabed - even if this might incur additional costs during construction and operation. That way, the costs will just go back to the project rather than being placed on landowners of Danish farmland for an eternity.</p>	<p>Refer to response no. 1.</p>	<p>The Danish Energy Agency has no more comments on this issue.</p>
95	<p>If Baltic Pipe is to be established, I fully believe that the gas pipeline should be laid in the water. This desire to spare the land and place a gas pipeline in the waters around Denmark has been presented over and over again by many from the beginning. However, it has been rejected with the argument that it is too expensive. Never have calculations been referred to, to show how much more expensive it would be to protect our land. I cannot accept that the country's governing parties do not find that our Danish landscape, nature, business and habitats are worth demanding payment to protect!</p>	<p>Please refer to answer no. 1.</p>	<p>The Danish Energy Agency has no more comments on this issue.</p>

Danish Fishermen PO			
96	<p>Baltic Sea</p> <p>In the outset of the report, as well as in table 9-125, it is mentioned that “For demersal trawlers, the impact is expected to be minor, as it will occupy less than 1% of the total fishing area in the Arkona and Bornholm basins.” This statement requires that it has been taken into account that some fishing areas are more important than others and that trawl routes are not cut through and thereby destroyed in a much greater area than merely the 400-metre corridor. As a starting point, the fishermen are not interested in compensation, but rather in being able to fish. Therefore, DFPO also expects that exemption from the Cable Order is requested, so fishing can be carried out above the gas pipe in the same manner as for Nord Stream 1 and the upcoming project 2. On this basis, it cannot be concluded that there will be no socio-economic loss for commercial fisheries if the pipeline is established and the fishermen do not have the ability to fish above this. From table 9-125, it can be seen that we are dealing with an area of 57.7 km², which will be closed off if no exemption from the Cable Order is requested. The area to be closed off to/destroyed for fishing will, in reality, be far greater, because trawl routes are cut through by the pipeline. That the inconvenience in relation to the pipeline and a protection zone of 200 m on each side of the cable is assessed to be “not substantial” is a strong underestimate of the project’s impact on commercial fisheries.</p> <p>It is essential that fishermen can operate above the pipeline, and that exemptions from the Kabelbekendtgørelsen (Order Regarding Protection of Submarine Cables and Submarine Pipelines) are granted so that it is possible to freely carry out fishing activities above the pipeline after the construction has finished.</p>	<p>GazSystem is familiar with the Kabelbekendtgørelsen and the possibility of applying for an exemption. They will consider the available options and juridically evaluate what is required for an exemption. Due to this it is up to the relevant authorities (Søfartsstyrelsen, the Danish Maritime Authority) to decide whether exceptions from the Kabelbekendtgørelsen may be granted.</p>	<p>The Danish Energy Agency points out that a condition has been added that Gaz-System S.A. must abide by the demands of the Danish Maritime Authority relating to how the project is carried out, its operation and dismantling.</p>
Sibelco			
97	<p>During dredging operations, material is removed from the seabed, and due to this the seabed is continuously lowered. In the current common areas (“fællesområder”), the dredging operations may lead to the seabed of sand being lowered by ten metres in the next 50 years, compared to the current seabed level. The position of the gas pipeline in relation to the current plan will cut through the south-west corner of the potential common area 526-IA and may also affect upcoming dredging in the common areas 526-JA and 526-HA.</p> <p>The Environmental Impact Report estimates that dredging is only affected for a few days, while the current pipeline is laid out in the relevant area. The aspect concerning risks posed by the lowering seabed and safety distances that may be required around the pipeline, as well as how much these safety distances will remove from potential common areas, has not been considered.</p>	<p>It is correct that the pipeline route cuts through the potential common area 526-I, “Bakkegrund Syd”.</p> <p>It is presumed that raw material extraction will not be carried out within a distance of 200 m from the pipeline, that is, within the safety area. See BEK no. 939 from the 27/11/1992 (Kabelbekendtgørelsen).</p> <p>Raw material extraction at over 200 m from the pipeline in common area 526-I, “Bakkegrund Syd”, will not affect the pipeline integrity, as the direction of current where the pipeline cuts through area 526-I lies parallel with the pipeline (see Attachment 3). This means that the lowering of the seabed that potential raw material extraction would create does not occur upstream from the pipeline, and thus would not affect the movement of sand around the pipeline. Because of this, it is our evaluation that raw material extraction at over 200 m from the pipeline route would not lead to erosion around the pipeline, and thus not a threat to the pipeline integrity.</p>	<p>The Danish Energy Agency has no more comments on this issue.</p>

	<p>The following impact on the dredging industry will likely affect the potential common areas as well as a reduction of the sand available in the general area.</p> <p>Sibelco is therefore of the opinion that the risks contained in laying the pipeline in areas that are affected by industries that lower the seabed must be considered.</p>		
98	<p>To ensure a future sustainable dredging industry, the marked areas on the seabed should also be available for the indicated uses in the future. When considering the gas pipeline position, it should therefore be considered that potential common areas for extraction of sand must be available for a long time as well as during all of the current 50-year period.</p> <p>Sibelco suggests a change in the gas pipeline's position so that it is routed west of the common area 526-JA. Such a change would mean that the gas pipeline would not cut through an existing and known area of interest.</p>	<p>Positioning the pipeline west of the common area 526-JA has not been chosen as the water depth there is lower and thus the risk of damage caused by ship hulls impacting with the seabed would be higher. In addition to this, using pipelaying ships with dynamic positioning is not possible on lower water depths. If the pipeline is moved even further west it will cross the Natura 2000-area Adler Grund og Rønne Banke. When establishing the route, it has been a high priority to avoid crossing this area.</p> <p>The suggested route has been selected based on a joint analysis of whether it is possible to minimise the risk of accidents, minimise the environmental impact, and minimise the impact on socio-economic activities, including raw material extraction. Unfortunately, it has in this integrated assessment not been possible to avoid a lesser impact of the possibilities for potential extraction of raw materials.</p>	<p>The Danish Energy Agency has no more comments on this issue.</p>
<p>The Danish Maritime Authority</p>			
99	<p>For the part of the Baltic Pipe to be constructed at sea, the Danish Maritime Authority's () interests from the meetings already held etc. will be taken into account, sailing risk analyses will be conducted and the attached Executive Order and assessment form will be complied with. References to the attached Executive Order and assessment form can preferably be written into the conditions of the establishment permit e.g. section 4.7.3 and 4.7.5.</p>	<p>The contractors are familiar with the procedure and will follow current legislation.</p>	<p>The Danish Energy Agency points out that a condition has been added that the contractor must abide by the demands of the Danish Maritime Authority relating to how the project is carried out, its operation and dismantling.</p>
<p>Environmental Protection Agency</p>			
100	<p>On page 105 in the Environmental Impact Report regarding gas pipelines in the Baltic Sea, it is stated that the route will minimise the impact on raw material extraction areas. The report map (figure 9-89) shows that the pipeline will enter in a potential common area. In addition to this, an evaluation has not been carried out regarding the pipeline importance for surveyed raw material resources that may be subject to raw material extraction at a later date. The Environmental Protection Agency therefore requires the figure 9-89 on page 335 to clarify the pipeline route in potential common areas, and also that the report describes whether the project will affect surveyed raw material resources. To be able to qualify the remark, the Environmental Protection Agency also requires a GIS-file for the pipeline. In relation to the clarification of the pipeline map in the potential common area, this is clearer now, but it would be better to also have an indication of the 200 m safety area around the cable on the map, as to be able to see the overlap with raw material areas. But in relation to the</p>	<p>It is correct that the pipeline route cuts through the potential common area 526-I, "Bakkegrund Syd".</p> <p>The pipeline with a 200 m safety area removes an area of 1.6 km² (the equivalent of 7.4 % of the total area of 21.7 km²) of the south-west corner of area 526-I. This area will thus not be available for raw material extraction.</p> <p>Geophysical surveys that were carried out as a part of the BP preliminary investigations indicate that the seabed where the pipeline cuts through area 526-I, "Bakkegrund Syd" (KP 175.2 - KP 177.4) consists of medium grained sand for between 7 and 12 meters below the seabed surface. If it is conservatively presumed that sand to a depth of 10 m below the seabed surface can be used, the pipeline with its 200 m safety area thus removes approximately 1.6 * 10⁷ m³ sand that potentially could be exploited.</p> <p>Shape-files of the route and safety area, as well as maps of the raw material areas (Map attachment 1) and the route and safety area are attached to the consultation report.</p>	<p>The Danish Energy Agency has consulted the Environmental Protection Agency that confirms that the response from the contractor is sufficient pertaining to the pipeline's effect on identified resources of raw materials at Bornholm and the raw material excavation area Fakse Bay North. Based on this, the Danish Energy Agency does not have any further comments on this issue.</p>

	<p>description of whether the project will affect surveyed raw material resources, we still consider this to be missing for the Baltic Sea area. This has, however, been done for the North Sea area on page 79 in the attached report.</p>		
101	<p>In addition to this, on page 334 in the Baltic Sea Report it is made clear that the raw material extraction area Fakse Bay North overlaps with the safety area that will be established around the pipeline, which means that at this location it will be required to stop the extraction of raw material. The Environmental Protection Agency requires a description of how it is intended to bring this raw material extraction to a stop, and what consequences this will have for the raw material supply as well as the licence holders. It can also be disclosed that further surveys of this extraction area have been requested, with the purpose of adding new supply licences to the area. The application has been reviewed at an authority hearing at the Danish Energy Agency (attached), among others, but we have not received any consultation report from the Danish Energy Agency. As it is a considerable investment for a company to carry out raw material surveys in regards to raw material extraction, we strongly recommend that the company carrying out the survey is contacted as soon as possible to inform them of the plans for establishing the Baltic Pipe in the extraction/survey area.</p>	<p>The pipeline route and 200 m safety area in Faxe Bay has, because of the nature of the seabed, been adjusted slightly in relation to the route that was included in the forwarded consultation material (the Environmental Impact Report). Because of this, the route goes further south than originally planned, meaning that the raw material extraction areas in Faxe Bay are not affected.</p>	<p>Referring to the response under no. 100.</p>
102	<p>General comments regarding the North Sea, the Little Belt and the Baltic Sea:</p> <p>1. After construction has ended in the North Sea, Little Belt, and the Baltic Sea, the extent of physical loss and physical disturbance to the overall habitat types will be assessed, documented, and reported to the Environmental Agency. The report on the extent of physical loss and physical disturbance to the overall habitat types (as defined in the Danish Marine Strategy, if possible) will be done once, immediately after construction has ended.</p> <p>The project has already confirmed this in the VVMs: "If the authorities require a report on the loss and physical disturbance of the seabed, an analysis will be submitted when the Baltic Pipe gas line has been established".</p> <p>Hence, it is recommended that the requirement of this report is included as a demand in the construction permit.</p>	<p>Agree</p>	<p>It is established as a standard condition for permission that:</p> <p>The Developer must develop a monitoring program for the construction phase, including for laying the pipeline. The monitoring programme must include the environmental conditions and must be approved by the Danish Energy Agency prior to starting the construction of the pipeline.</p> <p>The Developer must carry out an evaluation of the pipeline after it has been laid out, including a post-lay survey. The assessment with conclusions shall be</p>

			<p>submitted for the Danish Energy Agency's approval with regard to whether further seabed intervention work shall be performed.</p> <p>The developer shall also prepare a monitoring programme for the operating phase. The monitoring programme shall include the environmental conditions and be approved by the Danish Energy Agency before the pipeline is put into service.</p> <p>Furthermore, a condition has been added that the contractor must document the extent of physical loss, and the physical disturbance of the general habitat types of the seabed must be assessed, documented and reported to the Environmental Protection Agency. If possible, the extent of physical loss and physical disturbance must be in accordance with the general habitat types as defined by the Marine Strategy Directive. The report about the extent of physical loss and physical disturbance of the general habitat types of the seabed should be available no later than 2 months after completion of the construction.</p>
103	<p>2. It is recommended that a monitoring programme for sediment dispersion is implemented. At a minimum, monitoring the sediment dispersion should be carried out when there is sediment dispersion in sensitive marine habitats like eelgrass, biogenic reefs, and stone reefs. Monitoring sediment dispersion should be complimented by monitoring sensitive marine areas like eelgrass, biogenic reefs and stone reefs. Hence, monitoring will verify the basis for the</p>	<p>The Developer will create monitoring programs for approval by the Authorities.</p>	<p>See comment no. 102 above.</p>

	assessment of potential environmental impacts as reported in the VVMs as well as document the degree of potential impact on sensitive marine habitats.		
104	<p>Comment for the Baltic Sea: A coastal area with <i>Zostera marina</i> of approximately 5 000 m² will be removed at the tunnel construction mouth. This area should be included in the overall evaluation of physical loss and physical disturbance of the seabed habitat types. Potentially it should be considered whether to implement a monitoring program for the re-establishment of <i>Zostera marina</i> in the area with suitable intervals and up to a period of 10 years, to document the predictions of re-establishment stated in the EIA-assessment.</p>	The Developer will create monitoring programs for approval by the Authorities.	See comment no. 102 above.