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To the  
Secretariat of the Implementation Committee  
of the Espoo Convention  
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**Subject: Letter of Protest Regarding Potential Effects of the Pipeline and Port of Mukran Expansion for LNG near Rügen**

Dear Espoo Convention Secretariat,

I'm writing this letter to express our deep concern and protest against the proposed pipeline and port expansion for liquefied natural gas (LNG) near Rügen, which has the potential to negatively impact marine waters and the interests of neighboring states in the Baltic Sea. It is crucial to consider the far-reaching effects beyond the German Exclusive Economic Zone (EEZ) that this project may entail. I urge you to thoroughly assess and address the following points:

**Seabirds:**

The planning area and the German EEZ to the east are home to several species of seabirds protected under EU and national laws. These species, including black-throated and red-throated divers, great crested grebes, common scoters, velvet scoters, common mergansers, individual gannets (rare), razorbills, and guillemots, contribute to joint populations that span across neighboring countries in the Baltic Sea. The conservation of these populations is of great significance, and any disturbance or reduction of German populations in the planning area would directly impact the overall population status of these species in neighboring EU states. The disturbance caused by construction activities and regular ship traffic, particularly during the seabirds' main resting and moulting period from October to May, would pose a serious threat to these protected seabird species.

**Marine Mammals, particularly Baltic Sea Porpoise:**

The Baltic harbor porpoise population, forming a genetically delimited population in the central Baltic Sea, is already extremely threatened, with an estimated maximum of only about 500 individuals for the entire Baltic Sea. The individuals observed east of Rügen and in the Greifswalder Bodden are part of this critically endangered and low population. Any disturbance caused by ship noise or construction activities could have a severe impact on the viability of this supra-regional harbor porpoise population, further exacerbating its decline and potentially leading to extinction. Baltic harbor porpoises are protected as Annex V species under the Habitats Directive in all marine areas of the EU Member States.

**Commercially Important Fish, particularly Baltic Herring:**

The survival of Baltic herring depends on the success of their annual spring and autumn spawning migrations in the Greifswalder Bodden. The current stock of Baltic herring has dramatically declined to the extent that the quota allocation for commercial fishing has been set at zero for several years. The proposed LNG terminal plans, including the pipeline route and maintenance dredging of the Mukran harbor entrance, directly impact these spawning migrations due to various negative factors. If carried out during the fish migration periods in spring and fall, these activities will diminish the stock of

Baltic herring, threatening not only German interests but also those of neighboring countries such as Poland, Denmark, and possibly Sweden. The urgently needed stock rebuilding efforts in the Baltic Sea could be hampered.

Protected Fish Species, particularly Baltic Sturgeon:

Baltic sturgeon (*Acipenser oxyrinchus*), once extinct in the Baltic Sea, has been successfully reintroduced through a significant and costly project by Germany/BfN. The released sturgeon can be found off Rügen and in neighboring state waters such as Denmark. These strictly protected fish species feed near the bottom and would be adversely affected by pipeline construction activities off Rügen and any breaches of the Bodden edge threshold or pipeline relocation. Baltic sturgeon is protected by numerous international conventions, including the Helsinki Convention, EU law (FFH), and national species protection laws.

Shipping:

The expansion of the pipeline and port at Mukran would generate new shipping traffic, involving the transportation of dangerous goods through the Beltlakes and the Kadet Channel. Over the past decades, the Kadet Trench has witnessed an increased risk of vessel collisions and vessels going "off course" or running aground. Such risks associated with hazardous cargo transports in close proximity to the coast, and potential anchoring in the roadstead off Mukran, also pose a significant threat as potential military targets. Additionally, LNG carriers, due to their size and limited maneuverability, would pose a massive collision risk to existing and planned wind farms in the Baltic Sea off Denmark and Germany.

Considering the potential wide-ranging ecological and environmental consequences, I implore the Espoo Convention Secretariat to thoroughly investigate the proposed pipeline and port expansion near Rügen. It is crucial to conduct a comprehensive assessment of the project's potential impacts on shipping, seabirds, marine mammals, commercially important fish, and protected fish species, as highlighted above. The Espoo Convention provides a vital framework for transboundary environmental impact assessment, and it is imperative that the potential effects beyond the German EEZ are duly considered in this context.

I request the Espoo Convention Secretariat to engage with the relevant stakeholders, including Germany, and coordinate efforts to ensure that all potential impacts are assessed, mitigated, and monitored effectively. Furthermore, I urge the Secretariat to encourage open dialogue, transparency, and the participation of neighboring states in the decision-making process, to safeguard the shared interests and biodiversity of the Baltic Sea.

Thank you for your attention to this matter. I trust that the Espoo Convention Secretariat will give due consideration to the concerns raised in this letter and take appropriate actions to protect the Baltic Sea ecosystem and the interests of the neighboring states.

Yours sincerely,

Anna Meres

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