

Opinion about EIA on the different localities for the Deep Sea Port of Island Saaremaa

Estonian Green Movement
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1. A system for disclosure and commenting of updated version of the EIA of the different localities for the deep sea port of island Saaremaa was unsatisfactory

The public (at least the Friends of the Earth-Estonia and according to our information several other non-governmental environmental organisations) was not informed about the date for completion of the updated version of the EIA. In reality there were only two weeks to study the updated version of the EIA. Although the first version of the EIA was released already in Fall of 1999 those interested in commenting it had to make full study of the updated version in order not to miss changes made in the document.

It is strange that in Estonia that with acknowledged development of Internet society the EIA of the different localities for the Deep Sea Port was not available in the website. Staff of the Friends of the Earth-Estonia (FoE-Estonia) couldn't find it nor in the website of the Saaremaa County Government, Estonian Marine Institute or the Ministry of the Environment. Upon our request to receive the EIA by e-mail the Environmental Management Division of the Ministry of the Environment replied in phone that they do not have digital version of the document for distribution.

Although the FoE-Estonia managed to get a digital copy of the EIA from other NGOs we can't be sure if it was the authentic and latest draft. Unfortunately the digital version didn't include annexes, graphs and photos that are essential to give thorough assessment of the EIA. When undersigned (translator's note - Peep Mardiste, coordinator of the FoE-Estonia with headquarters in Tartu) was trying to go and examine annexes of the EIA on January 17, 2000, the rooms of Environmental Management Division that were publicly announced to host facilities for studying of EIA (Rävala 8-C601/602, Tallinn) were locked at 13:00 without any notice about reception times on the door. Limited time didn't allow us to pay visit to another locations for examining the EIA - Estonian Marine Institute in Tallinn or Saaremaa County Government in Kuressaare.

Taking into account the above mentioned we conclude that the possibilities of commenting the EIA of the different localities for the Deep Sea Port of Island Saaremaa were significantly reduced for those not living in Tallinn or Kuressaare. Contrary to the opinion of the Government of the Republic of Estonia the FoE-Estonia finds that the Deep Sea Port of Saaremaa Island is not a project of local importance and it has great importance for entire Estonia. As the annexes and graphs of the EIA were not accessible for the FoE-Estonia we are unfortunately unable to make detailed comments on the document.

2. Planning process of the Deep Sea Port had been unsatisfactory

EIA of the different harbour localities states in the paragraph 9 of conclusions' section (page 72) that the planning process of the Deep Sea Port had been satisfactory so far. The position of the FoE-Estonia is that the process had been unsatisfactory. The EIA of the different localities for the Deep Sea Port of Island Saaremaa had been just a formality as it seems that the future port location had been chosen by political process.

Such conclusion is supported by fact that the port location publicly preferred by the Saaremaa County Government (Undva in Uudepanga Bay) had been lately studied in much bigger detail than other possible locations. County Government has already failed grant application to receive funding from EU Phare 2000 for surfacing of the currently gravel road to possible port location of Undva. Why do they still talk publicly about fair competition between different locations Kihelkonna municipal government has initiated the process for detailed (spatial) plan for the Undva port which could be illegal. While doing so the municipal government is referring the paragraph 10'1 of the national act on planning and building. At the same time it's stated in the same law (paragraph 9'10) that detailed plan has to follow current environmental laws and acts. By the time detailed plan was initiated the public consultation and review process of the EIA of the different localities for the Deep Sea Port of Island Saaremaa was still going on and the EIA was not yet effective.

3. Deep Sea Port may not fulfil one of the main aims of the project, increased local employment rate

One of the main positive side factors accompanying the project is said to be increased employment rate among local people both in stages of the port construction and operation (paragraph 10). Knowing slightly the situation with similar large projects in other countries and in Estonia one could foresee that because of the lack of qualified employees in the site both construction workers and future servicing staff will come from Kuressaare (translator's note - capital of the county) or even from mainland. Assumable builder of the port EMV/Skanska is definitely having enough well-qualified workers outside Saaremaa without enough work. Predicted fast growth of the entrepreneurship among local population for servicing increased volume of tourists may not realise.

4. All of the possible locations for the Deep Sea Port have not been studied carefully enough; EIA was carried out in big hurry

Similarly to the first draft of the EIA of the different localities for the Deep Sea Port (turned down by the Ministry of the Environment) the final version is concentrating on comparison between three alternative locations (Undva, Veere and Tamme). Analysis on the two new possible locations (Vaigurand and Suuriku-Kuriku) that have been added after the first draft are very weak and presented only in paragraphs on hydrobiology, botany and impact to the geological objects. The analysis about Undva location are more detailed also if compared to these in Veere and Tamme. In order to get more objective overview on alternative port locations the authorities that ordered the of the EIA should have called for more detailed background analysis in Veere and Tamme in prior. It is also stated in the executive summary of the EIA that there were not enough data available and that alternative port locations had not been studied in the same detail obstructing the assessment. The timeline (some half of the year) for

the EIA of the different localities for the Deep Sea Port was too short considering the importance of the project.

5. Cruise ships for developing of the ecological tourism?

EIA is listing sea tourism and ecological tourism to be developed through constructing of the Deep Sea Port as some of the key activities for the Island of Saaremaa to survive (paragraph 1). It is doubtful to link fun-oriented mass-tourism that is associated with the cruises with ecological tourism. There must be other solutions for developing of the sea tourism and ecological tourism like establishing of the network of small well mapped and safe yacht harbours instead of one large Deep Sea Port.

6. Undva has no real advantage in ice conditions

The EIA mentions better ice conditions among advantages of the port location of Undva in Uudepanga Bay. At the same time one must take into account that the better ice conditions are caused by bigger openness to winds and therefore storms in Uudepanga Bay. Such a linkage should have been more clearly underlined in paragraph 7.

7. The EIA has no clarity in names of the port locations

In its executive summary the EIA of the different localities for the Deep Sea Port (pages 2-3) is listing following potential locations for the port: Tamme (Küedema Bay), Veere (Tagalahe Bay), Undva (Uudepanga Bay), Vaigurand and Suuriku-Kuriku (Tagalahe Bay). Both in the same executive summary and in other paragraphs another possible location of Ninase is mentioned. Such a use of parallel names for one location which is not explained is making it difficult for people to understand the EIA.