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**Bulgaria:**

Centre for Environmental  
Information and Education  
(CEIE)  
For the Earth!

**Czech Republic:**

Centrum pro dopravu a  
energetiku  
Hnutí Duha

**Estonia:**

Estonian Green Movement–FoE

**Georgia:**

Green Alternative

**Hungary:**

Nature Protection Club of  
Eotvos Lorand University (ETK)  
National Society of  
Conservationists–FoE (NSC)

**Lithuania:**

Atgaja

**Macedonia:**

Eko–svest

**Poland:**

Polish Green Network (PGN)  
Institute of Environmental  
Economics (IEE)

**Russia:**

Sakhalin Environment Watch

**Slovakia:**

Friends of the Earth – Center  
for Environmental Public  
Advocacy (FoE–CEPA)

**Ukraine:**

National Ecological Centre of  
Ukraine (NECU)

CEE Bankwatch Network's  
mission is to prevent  
environmentally and socially  
harmful impacts of  
international development  
finance, and to promote  
alternative solutions and public  
participation.

**TO:**

Peter Carter  
*Associate Director*  
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We are writing to inform you about deficiencies in the Hungarian scoping procedure for the Environmental Impact Assessment (EIA) for the Nabucco gas pipeline, for which we as National Society of Conservationists have been recognized as an interested party. In our opinion this scoping procedure may lead to an EIA that does not comply with the EIA Directive (85/337/EEC) and the Hungarian legal act on environmental impact assessment (314/2005, XII. 25.).

## **1. Lack of assessment of indirect and cumulative environmental impacts**

The EIA scoping document does not contain any reference to assessment of indirect environmental impacts of the project. We would like to underline that in line with the EIA Directive (85/337/EC) the environmental impact assessment has to deal with all the direct and indirect impacts of the project (Article 3) on „human beings, fauna and flora” and „soil, water, air, climate and the landscape”. Annex IV of the Directive specifies that description should contain effects resulting from: *“The existence of the project; the use of natural resources; the emission of pollutants (..)”* and *“should cover the direct effects and any indirect, secondary, cumulative, short, medium and long-term, permanent and temporary, positive and negative effects of the project.”* We would like to emphasize that this particular pipeline project may have several immediate indirect effects. Among them:

- CO<sub>2</sub>, NO<sub>x</sub> and SO<sub>x</sub> emissions resulting from gas combustion,
- impacts of constructing and operation of additional gas pipelines from Iraq, Syria and Turkmenistan (Trans–Caspian pipeline) necessary to bring gas to the starting point of Nabucco in Turkey,
- impacts of developing and operation additional gas extraction facilities,
- the production and transportation of the pipes,
- environmental impacts of the aircraft monitoring the pipeline (weekly – 50 m altitude).

## **2. The lack of assessment of alternative solutions.**

Furthermore, in the scoping documentation there is no indication that alternatives (in terms of achieving the aim of energy diversification, routing and technical solutions) required by the EIA Directive (Article 5)

will be assessed in the EIA process. Moreover, the National Society of Conservationists has taken part in several public hearings during which the construction company suggested that the route of the pipeline would be accepted, therefore there is no need to identify and assess an alternative routing. The same position saying that the selection of the route corridor has been completed was expressed by Nabucco consortium in their press release dated 23 of April.

In our opinion, both indirect impacts of the project and alternatives required by the EIA Directive should be considered for the whole project crossing five countries and having potential adverse impacts on more. This requires preparation of an overall EIA report similar to the one for the Nord Stream gas pipeline. Unfortunately, even on the country level in Hungary, the Nabucco project has been divided into four regional sections for the purpose of environmental impact assessment. Such an approach prevents any robust EIA process that takes into account all the project impacts and assesses all available alternative solutions.

The National Society of Conservationists and CEE Bankwatch Network ask the EBRD/EIB to make sure that the aforementioned problems are addressed sufficiently and the obligations resulting from EU and Hungarian law are observed before it makes any decision regarding financing the project.

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