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NABU position and engagement regarding the Fehmarnbelt Fixed Link project

Dear Members of the Committee,

In recent weeks, there have been various articles in Danish media about NABU's engagement regarding the Fehmarnbelt Fixed Link project. Our impression is that there is a misconception of our approach which focusses both on the environmental as well as on the economic and transport dimensions of the project. That is why we would like to take liberty moment to explain our position in detail.

Naturschutzbund Deutschland e.V. (Nature and Biodiversity Conservation Union – NABU) is the biggest German environmental organisation with almost 600,000 members. Besides our main office in Berlin with 160 employees, we run offices in each of Germany's 16 federal states. The variety of issues NABU deals with reaches from agriculture, waste or renewable energies to ornithology and transportation.

Sustainability is a key pillar in infrastructural development today. Our objective is to minimize environmental impacts and to preserve favourable environmental conditions where possible. Major projects, just like the Fehmarn Belt Fixed Link, do imply serious impacts on environment and natural surroundings in which they are built, sometimes irreversible. Hence, it is of crucial importance to balance between the societal and economical benefits on the one hand and the environmental impacts on the other hand. Tools like cost-benefit analyses have to be used here in order to determine whether or not the benefits outweigh the costs. Therefore, we engage in public and private dialogues to ensure that potentially dangerous implications are taken seriously into account before natural surroundings are changed irrevocably. It is our conviction that only by weighing the pros and cons of a project, the best and most sustainable solution for nature and for us, the people who live in it, can be found. That might be a feasible but less problematic alternative.

NABU does not stand for the opposition of infrastructure and industry projects in general. We are not enemies of development, on the contrary: We seek active cooperation with industry leaders and vice versa, in order to benefit from each other's knowledge and expertise in the development of

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sustainable initiatives. And before we decide to engage in a specific project, we make sure to collect the expertise that is necessary to evaluate a project from all sides: This includes not only environmental, but also economic, financial, social and jurisdictional assessments. A solid planning process requires the consideration of all these factors. It is by this holistic and sustainable approach that NABU gained respect and a good reputation in public, politics and economy in Germany. Nevertheless we might evaluate that from our point of view it is justified to oppose projects which do not fully show a socio-economic demand which justifies severe environmental impacts.

In the case of the Fehmarn Belt Fixed Link, we think that the negative impacts heavily outweigh the benefits. In comparison to e. g. the Elbe tunnel in Hamburg frequented by 160 000 users per day, the traffic numbers projected by Femern A/S are comparatively low on one hand. On the other one third of the assumptions is induced "Border-Shop"-traffic by the ferry operator. In addition Scandlines announced to compete with the Fixed Link Fehmarnbelt. Hence, the infrastructural demand is limited, the economic potentials are vague and the financial assumptions incomplete and risky. Taking these economic uncertainties into account, building an immersed tunnel in one of the most sensitive areas of the Baltic Sea is disproportionate. The environmental analysis carried out so far lacks a proper and long-term picture on the true impacts on the marine environment.

For this reason, we have raised our concerns to the planning authority in Germany during the plan approval process. During the consultation meetings in Kiel, it became obvious that Femern A/S still has a lot of work to do before its environmental analysis will be acknowledged as sufficient to the German authorities. Due to a lack of infrastructural demand in general, NABU will continue to accompany this process critically. And as long as we feel that our (and other parties') environmental objections are not taken properly into account by the planning authorities, we do not fear a legal battle at the administrative courts. Therefore we possess the expertise, the resources and independence to do so. We also would like to point out that it is not NABU who eventually stops a project in court, it is the court itself which decides that a planning process is flawed. Hence, we object to the allegation preferred by some parties that it is our fault when a project does not proceed. It is simply the responsibility of the project managers.

Unfortunately, many infrastructural projects are not planned carefully out of negligence of existing environmental and other laws. When politics decided to optimize the accessibility of the river Elbe in Hamburg NABU, among other environmental organisations, was able to prove that the impacts to the sensitive river area were not considered properly. Consequently, the Federal Administrative Court halted the project. More than three years later, the project planners still failed several times to



prove that the project can be done environmentally sound and in harmony with national and especially European law.

As we stated before, respected committee members, NABU's general policy is to engage into stakeholder dialogues, but based on mutual respect for each other. Something we have missed by Femern A/S since financial, legal or infrastructural weaknesses of the project became more and more obvious. Openness and honesty are key requirements. Instead, we have become increasingly concerned about the way how our engagement is being interpreted by some Danish media outlets, mostly based on Femern A/S PR activities. This is why we would like to take the opportunity to set up a meeting with you at Copenhagen's Folketing Transport Committee in order to discuss our point of view and answer potential questions on the challenges and opportunities of German planning laws.

We are looking forward to your reply and would be feeling most thankful for giving us an opportunity to further enhance the dialogue.

With kind regards

On behalf of NABU

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