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**Baltic Sea Parliamentary Conference**

Schlossgartenallee 15, 19061 Schwerin Germany  
Secretary General Bodo Bahr [bodo.bahr@bspcmail.net](mailto:bodo.bahr@bspcmail.net)

*RE: Adverse and large-scale environmental impacts of the Lynetteholm project*

**Dear Madame/Sir,**

Coalition Clean Baltic, an international environmental NGO network, uniting 24 organizations from 11 countries of the Baltic Sea Region, would like to express its grave concerns about the proposed Lynetteholm project in Copenhagen, that is currently under discussion in the Danish Parliament.

Despite being promoted as a flood protection and climate change adaptation measure, the project's negative environmental impacts, according to our knowledge, seriously outweigh its merits.

Most obvious and long-term impacts will occur due to traffic congestion for construction purposes as well as disturbance of the seabed and dumping of sediments due to dredging and reclamation. However, the external experts are seriously concerned that establishment of Lynetteholm could have disastrous consequences for the whole Baltic Sea environment, leading to obstruction of one of three deep channels in Øresund and blocking salt waters inflow to the Baltic Sea. The latter is vital important for bringing oxygen-rich North Sea waters to oxygen-depleted bottom layers of the Baltic and thus, for balancing fragile and eutrophied Baltic Sea ecosystem. Blocking this natural process is totally unacceptable given the current poor status of the Baltic Sea environment and the efforts undertaken by all the coastal nations within HELCOM to improve it.

Henceforth, the environmental impacts of Lynetteholm project are far beyond the area of the construction site in Øresund and should have been treated through multilateral transboundary EIA, carried out in line with the Espoo Convention and other respective legislation. It was regretful to learn that only Sweden was consulted about the project and that its predominantly [negative response](#), including on dumping and risks to Swedish Natura 2000 areas, have been neglected. Germany and some other Baltic countries were only informed at this very late stage in the project development process, and only after urging requests.

To our understanding this also seriously contradicts with the obligations of Denmark in accordance with the [Helsinki Convention](#), 1992 (Art.3,7,15,17, HELCOM Recommendations [40-1](#), [35-1](#), [18-2](#), [17-3](#)), as well as under the Directive 2011/92/EU on EIA and Directive 2001/42/EC on SEA.

Given the above, we are calling the Danish Parliament to postpone the decision on the proposed Lynetteholm project until proper transboundary EIA is carried out and necessary mitigation measures are devised and agreed with all concerned and affected parties.

Aija Caune,  
Chairperson  
Coalition Clean Baltic

Mikhail Durkin  
Executive Secretary  
Coalition Clean Baltic

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**E-mail:** [secretariat@ccb.se](mailto:secretariat@ccb.se); [www.ccb.se](http://www.ccb.se) **Org. number:** 802015-1281 **CCB is a member of The World Conservation Union (IUCN)**

*Coalition Clean Baltic is a network of environmental NGOs sponsored by:*

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