

To:

**poststelle@gaa-ig.niedersachsen.de**

Staatliches Gewerbeaufsichtsamt Lüneburg,

Auf der Hude 2, 21339 Lüneburg

CC:

**info@stadt-stade.de / karina.schuett@stadt-stade.de**

Hansestadt Stade, Rathaus,

Hökerstraße 2, 21682 Stade

and

**info@amt-gums.de**

Amt Geest und Marsch Südholstein,

Wedeler Chaussee 21, 25492 Heist

26 June 2023

**Objection against the permitting/construction of the LNG (liquefied natural gas)  
import terminal Stade (Hanseatic Energy Hub)**

Dear Madam / Sir,

we, the undersigned US groups, and individuals are and will be directly negatively impacted by the proposed LNG import terminal Stade and object to the plans of Hanseatic Energy Hub. We explain our objection as follows:

**1. Direct link between US export terminals (in particular in Louisiana) and proposed German import terminals at Stade**

Hanseatic Energy Hub (HEH) plans to build and operate an LNG (onshore) import terminal at Stade with an annual regasification capacity of 13.3 billion cubic meters (bcm)[i] One main contract partner of HEH is the German energy company Energie Baden-Württemberg (EnBW) which booked import rights of 6 bcm (or half of the planned overall regasification capacity) for the LNG terminal at Stade.[ii] The other important contract partner for HEH is Securing Energy for Europe (SEFE), formerly Gazprom Germania, now owned by the German government. SEFE booked capacities of 4 bcm/annum of LNG for 20 years with HEH.[iii]

## **1.1 EnBW-Venture Global**

EnBW on the other hand signed two long-term supply contracts for US LNG with Venture Global.[iv] Under the Sales and Purchase Agreements Venture Global will deliver up to 2.72 bcm LNG per year for a period of 20 years (with a 10-year extension option) starting 2026. Venture Global agreed to deliver the LNG from their yet to completely build Calcasieu Pass (CP) 2 and Plaquemines LNG export facilities in Louisiana, USA. [v]

## **1.2 SEFE-Venture Global**

Venture Global announced on June 22, 2023, that it has signed a 20-year deal to provide SEFE with 3 bcm per annum of LNG – making Venture Germany’s largest supplier of fracked gas. The company wants to deliver supplies from the Calcasieu Pass 2 project – an extension of the existing export terminal.[vi]

Spot deliveries of US LNG would come on top of the long-term contracts. According to the German Federal Association of the Energy and Water Industry (Bundesverband der Energie- und Wasserwirtschaft – BDEW) 80% of already occurring direct LNG imports into Germany came from the USA.[vii]

## **2. Fuelling global warming and threatening Germany’s climate targets through fracked gas imports**

According to a Climate Action Tracker analysis[viii] published in November 2022 as part of COP27, LNG infrastructure currently under construction worldwide, as well as additional planned infrastructure, could generate more emissions by 2030 than the International Energy Agency’s Net Zero scenario allows by then. By 2050, cumulative LNG emissions could consume about 10% of the global carbon budget remaining under the Paris Climate Agreement. Current massive LNG expansion (especially on both sides of the Atlantic) is thus torpedoing efforts to mitigate the climate emergency.

A June 2022 report of the Environmental Integrity Project[ix] showed that the current US LNG buildout (partially co-financed by German banks or enabled through long-term contracts with German companies) will contribute significantly to an increased global warming which already shows dire impacts on people and the environment on both sides of the Atlantic. The New Climate Institute published in March 2023 an analysis which outlined that the German LNG plans lead to a fossil fuel infrastructure overcapacity, and they also threaten Germany’s national climate protection goals.[x]

According to the US Energy Information Agency, about 80% of the gas in the US in 2022 was shale gas extracted through fracking.[xi] The negative environmental and health impacts as well as human rights violations of the fracking industry are well documented[xii] – assumingly reasons why Germany banned fracking for shale gas. Studies and measurements also show that fracking contributes significantly to global warming.

Delivering fracked gas to German LNG terminals – in particular after 2045 - , however, would contradict the German Climate Protection Act, which stipulates climate neutrality by 2045. Also, by 2030, Germany wants to reduce greenhouse gas emissions by as much as 65% compared to 1990.[xiii]

### **3. Effects on site / Threatened wetlands**

The consequences for natural ecosystems, flora, fauna, and local people are dramatic: LNG projects not only exacerbate the climate emergency, leading among other things to rising sea levels and the loss of many coastal stretches, they also directly destroy natural habitats and the livelihoods of local people.

According to the US Federal Energy Regulatory Commission (FERC), 27 export terminals are under construction (including expansion projects at existing LNG terminals). Construction of this infrastructure threatens wetlands in a total area equal to about half of Washington, D.C. Wetlands are sites of high biodiversity and mitigate the effects of hurricanes. The most threatened wetlands are in Louisiana.[xiv] The supply chain of the LNG import terminal(s) at Stade will contribute to the destruction of these wetlands.

### **4. Livelihoods of fishermen threatened**

The potential loss of these wetlands has also fueled protests from fishermen and women who fear for their livelihoods.[xv] The small fishing boats are also increasingly being displaced by the big LNG ships - the narrow waterway in western Louisiana isn't big enough for both. Disruptions that can last several hours can cost as much as \$5,000 a night in lost revenue.[xvi] These problems will increase if the proposed additional facilities of Venture Global (partner of EnBW and SEFE and main supplier of the proposed import terminal at Stade) will come online.

The wetlands serve as nursery grounds for fish, crabs and shrimp - all-important components of Louisiana's commercial and recreational fisheries. The crab fishery alone employs 15,000 people and generates about \$1.3 billion annually, according to the Louisiana Seafood trade association.[xvii]

### **5. Air pollution, accidents, and environmental racism**

A particular burden on local people is daily air pollution[1] from existing fossil fuel infrastructure (including LNG terminals). Significantly, Indigenous people, people of color, Latinos, and low-income communities often bear the brunt of any impacts

In a January 2023 report, the non-governmental organization Louisiana Bucket Brigade documented, among other things, significant operational problems at the existing Calcasieu Pass (CP1) LNG export terminal - operated by Venture Global (co-contractor with EnBW and SEFE). The company repeatedly failed to properly report emissions and accidents that occur regularly. Since operations began 91 days were documented between January 19th and May 31st, 2022, where gas was flared and pollutants were emitted into the environment. Five accidents were reported to the Louisiana Department of Environmental Quality during this period. The company was found not to be in full compliance with its reporting requirements.[xviii]

Constant flaring has been well documented over several days with little to no interruption - including corresponding noise and light pollution as well as air pollution.[xix] The Louisiana Department of Environmental Quality was also presented with visual evidence of the harmful and hazardous air pollution and the generating of greenhouse gas emissions in the form of videos taken with special cameras.[xx].

## **6. Cumulative transboundary impacts need to be assessed and addressed**


The final investment decision for the Plaquemines LNG export terminal was taken in March 2023[xxi] – also enabled through the long-term supply contract with EnBW. Venture Global has proven to be unable to safely operate its already existing LNG export terminal (Calcasieu Pass), meaning that Stade will eventually import all the related emissions and air pollution over the contracted period of at least 20 years – with dire consequences for the environment and climate on both sides of the Atlantic.

A proper and comprehensive environmental impact assessment must assess and address the cumulative impacts of a project – in relation to its contribution to global warming and its impacts on the environment and public health. The description of the expected significant environmental effects should cover the direct and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the project.

In May 2023 seven Gulf-based organizations petitioned the U.S. Environmental Protection Agency (EPA) to investigate and correct systematic abuse of Clean Air Act permitting standards violations in Louisiana and Texas.[xxii] The potential human rights violations that are already occurring and are expected to take place in the future because of these projects are also enabled by the contractors and co-funders from Germany. This needs to be addressed in relation to the current application for a permit related to the LNG import terminal at Stade.

**We urge you to take our objection into account and deny the permit for the LNG (onshore) import terminal at Stade. We also call upon you to conduct a public hearing and to give us a chance to make our voices heard at that public hearing.**

Sincerely,

Signatories (Groups/NGOs)	Logos
<p><b>For a Better Bayou, Louisiana</b></p> <p>Contact: James Hiatt Email: james@betterbayou.net</p>	
<p><b>Healthy Gulf, Louisiana</b></p> <p>Contact: Matt Rota Email: matt@healthygulf.org</p>	
<p><b>Louisiana Bucket Brigade</b></p> <p>Contact: Anne Rolfes Email: anne@labucketbrigade.org</p>	
<p><b>The Vessel Project of Louisiana</b></p> <p>Contact: Roishetta Ozane Email: roishetta@gmail.com</p>	

Signatories (Individuals)
<p><b>John Allaire</b>, Resident Lower Cameron Parish, Louisiana (neighbour of Venture Global) email: <a href="mailto:johncallaire@yahoo.com">johncallaire@yahoo.com</a></p>
<p><b>Darryl Malek-Wiley</b>, MW &amp; Associates New Orleans, Louisiana email: <a href="mailto:darrylmw007@gmail.com">darrylmw007@gmail.com</a></p>

---

[1] Among others, by methane, benzene and volatile organic compounds.

---

- [i] <https://www.hanseatic-energy-hub.de/en/concept/our-concept/>
- [ii] <https://www.hanseatic-energy-hub.de/en/news/detail/enbw-erhoeht-buchung-fuer-Ing-import-in-stade/>
- [iii] <https://www.hanseatic-energy-hub.de/en/news/detail/sefe-group-secures-long-term-regasification-capacity-in-stade-germany/>
- [iv] <https://www.enbw.com/company/investors/news-and-publications/enbw-venture-global-Ing.html>  
<https://www.enbw.com/company/investors/news-and-publications/enbw-venture-global-Ing-supply.html>
- [v] <https://www.energy.gov/sites/default/files/2022-10/CP2%20EnBW%20LNG%20DOE%20filing%20%28Updated%20ACQ%29.pdf>  
<https://www.energy.gov/sites/default/files/2022-10/Plaquemines%20EnBW%20DOE%20filing%20%28Updated%20ACQ%29.pdf>
- [vi] <https://www.reuters.com/business/energy/venture-global-Ing-signs-20-year-contract-with-german-energy-firm-2023-06-22/>
- [vii] <https://www.klimareporter.de/deutschland/fracking-gas-stroemt-vermehrt-nach-deutschland>
- [viii] <https://climateactiontracker.org/publications/massive-gas-expansion-risks-overtaking-positive-climate-policies/>
- [ix] <https://environmentalintegrity.org/wp-content/uploads/2022/06/LNG-report-6.9.22.pdf>
- [x] <https://newclimate.org/resources/publications/deutsche-Ing-ausbauplane-fuehren-zu-uberkapazitaet-und-gefahren>
- [xi] <https://www.eia.gov/tools/faqs/faq.php?id=907&t=8>
- [xii] <https://concernedhealthny.org/compendium/>  
<https://www.tribunalonfracking.org/judges-statements/>  
<https://www.universityofgalway.ie/media/irishcentreforhumanrights/files/reports/ICHR-Report-International-Human-Rights-Impacts-of-Fracking.pdf>
- [xiii] <https://www.bundesregierung.de/breg-de/schwerpunkte/klimaschutz/klimaschutzgesetz-2021-1913672>
- [xiv] <https://news.oilandgaswatch.org/post/proposed-Ing-export-terminals-threaten-22-000-acres-of-wetlands-many-in-louisiana>
- [xv] <https://lailluminator.com/2022/11/10/shrimpers-join-environmentalists-in-protest-of-Ing-terminal-expansions/>
- [xvi] <https://www.houstonchronicle.com/business/energy/article/Ing-gulf-coast-development-fishing-disruption-18132857.php>
- [xvii] <https://www.louisianaseafood.com/industry>
- [xviii] [https://labucketbrigade.org/wp-content/uploads/2023/01/Gas\\_Export\\_Spotlight\\_CameronCalcasieuPass.pdf](https://labucketbrigade.org/wp-content/uploads/2023/01/Gas_Export_Spotlight_CameronCalcasieuPass.pdf)
- [xix] [https://elibrary.ferc.gov/eLibrary/filelist?accession\\_num=20230313-5068](https://elibrary.ferc.gov/eLibrary/filelist?accession_num=20230313-5068)
- [xx] <https://www.youtube.com/playlist?list=PL9BS7nDf-8tpnWs52cR3OvzH3YZdkJkV/k>
- [xxi] <https://ventureglobalng.com/press/venture-global-announces-final-investment-decision-and-financial-close-for-phase-two-of-plaquemines-Ing/>
- [xxii] <https://earthjustice.org/press/2023/gulf-groups-file-petition-to-correct-louisiana-and-texas-violation-of-air-pollution-permitting-standards>