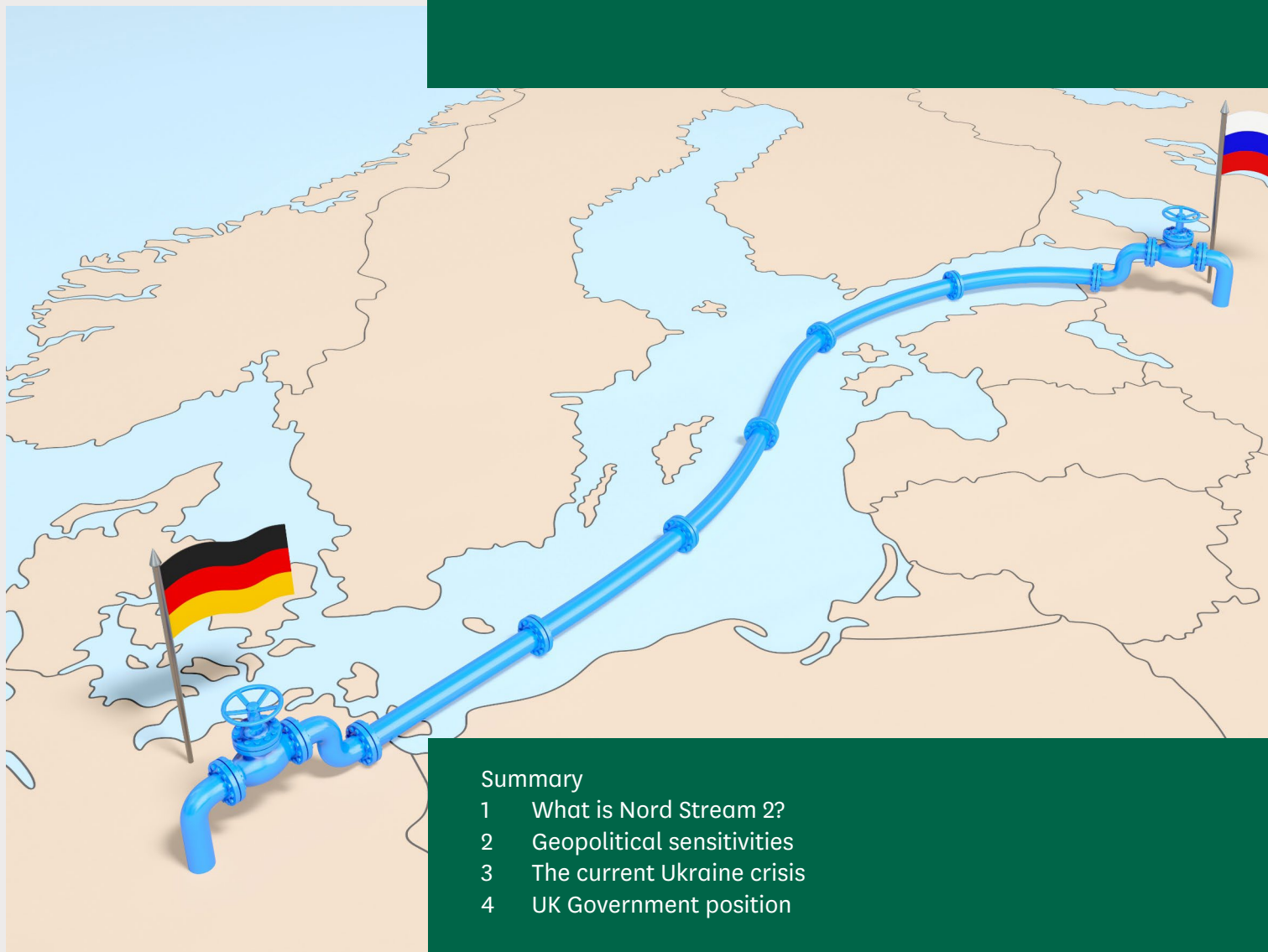


Research Briefing

By Claire Mills

2 March 2022

Geopolitical implications of Nord Stream 2



Summary

- 1 What is Nord Stream 2?
- 2 Geopolitical sensitivities
- 3 The current Ukraine crisis
- 4 UK Government position

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Contents

Summary	4
1 What is Nord Stream 2?	6
1.1 Other Russian pipelines into Europe	7
2 Geopolitical sensitivities	9
2.1 EU energy security	9
2.2 Implications for Ukraine	11
3 The current Ukraine crisis	14
3.1 Suspension of certification	14
3.2 Withdrawal of investors	15
3.3 Support for European energy security	16
4 UK Government position	17

Summary

Nord Stream 2 (NS2) is a natural gas pipeline that directly connects Russia to Germany, via the Baltic Sea. It was launched in 2015 by Nord Stream 2 AG, a subsidiary of the Russian state-controlled company Gazprom.

It follows a similar route to the original Nord Stream pipeline that was completed in 2011 and, once operational, NS2 is expected to double the total capacity of that route to 110 billion cubic metres (bcm) per year. Nord Stream 2 AG estimates this will be enough to supply some 26 million European households and has described the pipeline as essential to [enhancing “the EU’s security of supply of natural gas” \(PDF\)](#).

Construction on the pipeline began in 2018 but it has been delayed due to protracted legal battles and the imposition of US sanctions against companies working on the project in 2019. After nearly five years, and at a reported cost of \$11 billion, [the pipeline was eventually finished in September 2021](#).

However, the pipeline has not been certified by German regulators and is not yet operational.

Opposition to the pipeline

Opposition to the pipeline has been fierce. Russia and Germany’s longstanding view has been that the pipeline is a purely economic project. However, the US, UK and the EU have all expressed concerns over its geopolitical implications.

[Critics view the pipeline as a political project of the Kremlin](#) and part of a broader geopolitical strategy to undermine the West by increasing European reliance on Russian gas supplies and potentially giving Russia leverage over security of supply.

In recent months, President Putin has been accused by the EU of [“weaponising” Russian gas supplies \(PDF\)](#) to Europe in order to keep prices high and get the pipeline approved by EU regulators. Allegations which [the Kremlin has denied](#).

Implications for Ukraine

Nord Stream 2 has implications for Ukraine. Although not a huge importer of Russian gas, Ukraine is a major transit country of current Russian gas pipelines into Europe. Transit fees are thought to account for almost 3% of Ukraine's GDP, which will bring an expected revenue of [\\$2-3 billion](#) annually over the next five years.

The direct supply of gas to Europe via Nord Stream 2 would allow Russia to largely bypass Ukraine, if it so chose, which the Ukrainian Government has described as akin to an ["economic and energy blockade"](#).

As such, there has been pressure to protect Ukraine as a gas transit country. In July 2021, Germany and the US reached an agreement to prevent the pipeline ["being used as a weapon"](#) against Ukraine.

The current crisis in Ukraine

Already controversial, the Nord Stream 2 project has taken on greater significance amidst the current crisis in Ukraine.

Western nations, including the UK, US, EU and NATO allies, warned Russia that taking military action in Ukraine would have [significant economic consequences](#), and a halt to the Nord Stream 2 project was considered an ultimate sanction.

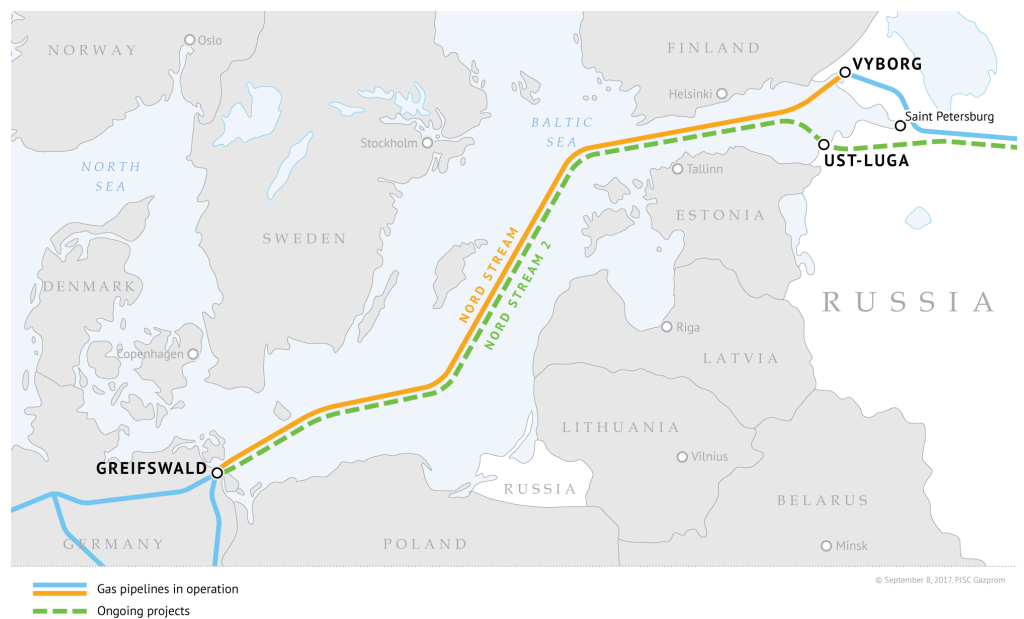
On 22 February 2022 [the German Government halted the certification process](#) for NS2 "for the time being", and several investors in the project have said they are considering ending their involvement in protest over Russia's actions in Ukraine.

The longer-term future of the pipeline is now tied to the Ukraine crisis and how that may be resolved, all of which is uncertain. Indeed, [media reports on 1 March 2022 suggest that Nord Stream 2 AG is considering filing for insolvency](#). The company has neither confirmed nor denied the reports.

1

What is Nord Stream 2?

Nord Stream 2 (NS2) is a natural gas pipeline that directly connects Russia to Germany, via the Baltic Sea.¹ Launched in 2015 by [Nord Stream 2 AG](#), a subsidiary of the Russian state-controlled company Gazprom, it follows a similar path to the original Nord Stream pipeline that was completed a few years earlier.²



Source: Gazprom

Recognising that domestic production in the EU has declined, at a time when global demand is rising, Nord Stream 2 AG describes the pipeline as essential to enhancing “the EU’s security of supply of natural gas”.³ It says the pipeline will contribute to the EU’s climate goals by providing “the route with the least environmental impact”.⁴

¹ The pipeline runs through the exclusive economic zones/ territorial waters of Russia, Finland, Sweden, Denmark and Germany. Permits with all of these countries are in place.

² Gazprom has a 50% financial stake in Nord Stream 2 AG. European energy companies ENGIE, Uniper (formerly E.ON), Wintershall, OMV and Shell are all investors in the project, each committing 10% of the cost of the venture. (Nord Stream 2 AG, [Press release](#), 12 November 2015)

³ Nord Stream 2 AG, [Project Background](#), February 2021 [accessed 7 February 2022]

⁴ Nord Stream 2 AG, [Project Background](#), February 2021 [accessed 7 February 2022]

Once operational, NS2 is expected to double the total Nord Stream capacity to 110 billion cubic metres (bcm) per year, which Gazprom estimates is enough to supply some 26 million European households.⁵

Construction on the pipeline began in 2018 but it has been delayed due to protracted legal battles and the imposition of US sanctions against companies involved in the pipeline's construction in 2019. After nearly five years, and at a reported cost of \$11 billion, the pipeline was eventually completed in September 2021.⁶

The pipeline has not yet been certified by German regulators and is not operational.⁷ In November 2021, German regulators said that the pipeline did not comply with German law and suspended its certification until the operator of the pipeline meets German legal requirements on ownership.⁸

1.1

Other Russian pipelines into Europe

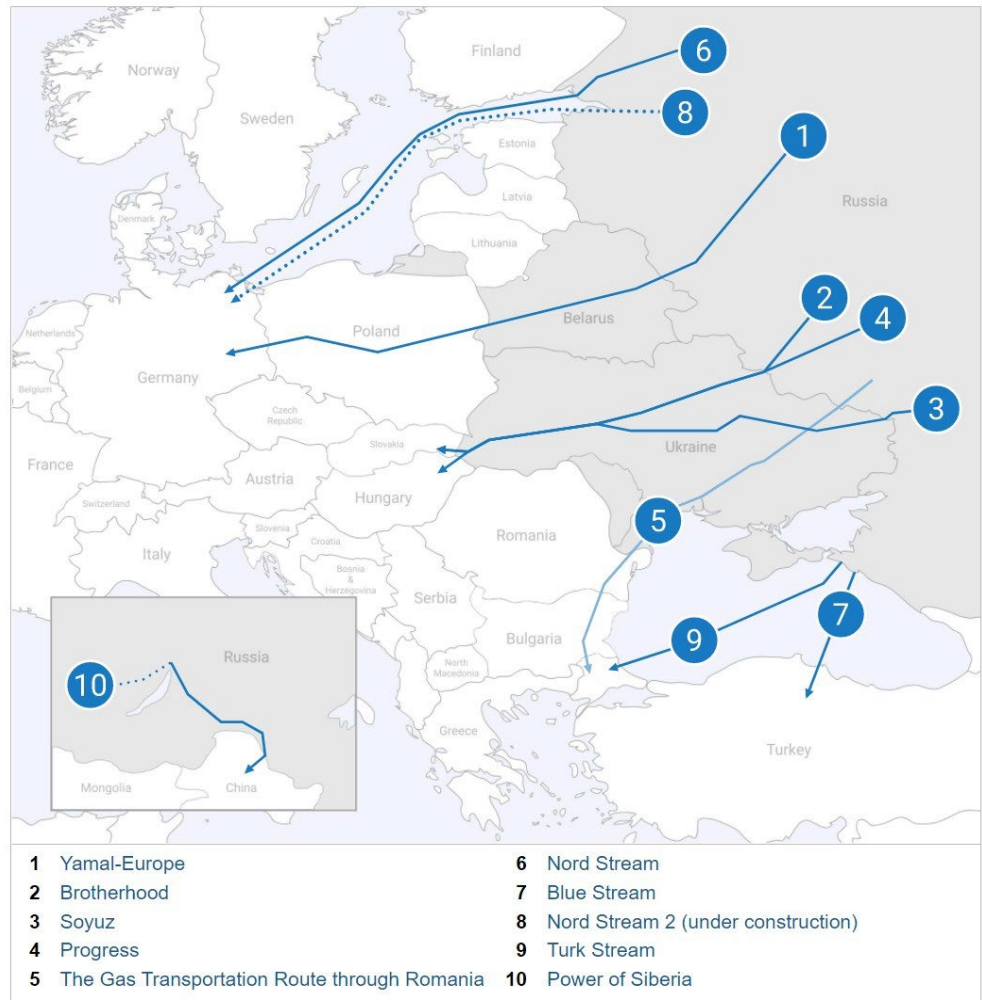
The other major pipelines from Russia into Europe are Nord Stream 1, the Yamal-Europe pipeline to Germany, which transits Belarus and Poland, and the Brotherhood/Soyuz/Progress pipeline network, which passes through Ukraine.

⁵ Nord Stream 2 AG, [Facts and figures](#), September 2021 [accessed 8 February 2022]

⁶ Reuters, "[Russia completes Nord Stream 2 construction, gas flows yet to start](#)", 10 September 2021 and Nord Stream 2 AG, [Press release](#), 10 September 2021

⁷ The European Commission has made two attempts to have some regulatory control over the pipeline using Gas Directive 2009/73, [seeking a mandate from Member States](#) to negotiate an agreement with Russia in June 2017⁷ and [proposing an amendment to Gas Directive 2009/73](#) in November 2017. Both were judged to have no legal basis by the European Council's legal service and could only be enacted as a "political choice".

⁸ Bundesnetzagentur, [Certification for Nord Stream 2 suspended](#), 16 November 2021



Gazprom, [Transportation projects](#), accessed 14 February 2022

It is the trunk pipelines that transit Ukrainian territory, that currently provides most of Europe's gas supply. Together these pipelines constitute the largest gas transport corridor into Europe with a capacity of over 100bcm. The Yamal-Europe pipeline, by comparison, delivers 33bcm and Nord Stream 1 delivers 55bcm.

2

Geopolitical sensitivities

The Nord Stream 2 pipeline has been the subject of controversy and disagreement among EU nations and between Germany and Washington since its inception. Those who support the project have clear reasons for doing so: the pipeline will double the capacity of Nord Stream and will provide a significant proportion of the EU's future gas demand.⁹ This is particularly pertinent to Germany which has ended nuclear energy production and is reliant on gas imports, with Russia accounting for more than half of its supplies.¹⁰

For critics, including the European Commission and several central and eastern European countries, there are two main concerns:

- Energy security and the EU's dependence on Russian gas supplies, raising the question of whether Russia could use the pipeline for geopolitical advantage in the future.
- The impact on Ukraine as a transit country and whether Russia could use Nord Stream 2 as a tool of hybrid warfare to further undermine Ukraine's territorial integrity.

2.1

EU energy security

“As I have said on many occasions, this is strictly a commercial project without any hint of politics”.

[President Vladimir Putin](#), 15 February 2022

While Russia insists Nord Stream 2 is a commercial project, critics of the pipeline view it as a political project of the Kremlin and part of a broader geopolitical strategy to undermine the West by increasing European reliance on Russian gas supplies and potentially giving Russia leverage over security of supply.

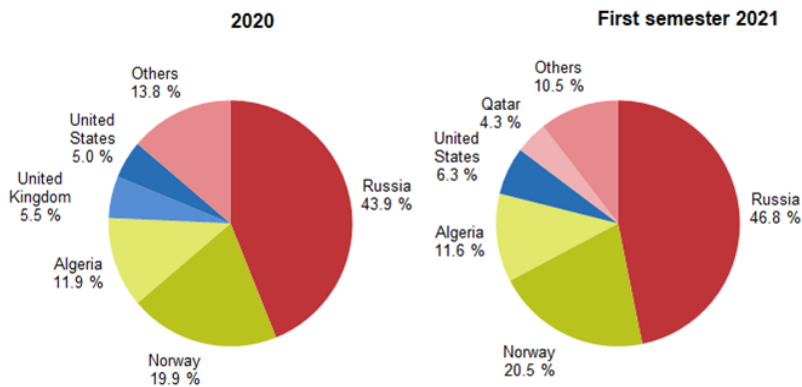
According to Eurostat, the EU's statistical office, in 2020 Russian gas supplies accounted for 43.9% of EU gas imports, rising to 46.8% in the first quarter of 2021. Of the EU Member States, ten countries in central and eastern Europe (Bulgaria, Czech Republic, Estonia, Latvia, Hungary, Austria, Romania, Slovenia, Slovakia and Finland) imported more than 75% of their natural gas imports from Russia.¹¹

⁹ Nord Stream 2 AG, [Facts and figures](#), September 2021

¹⁰ Eurostat, [EU imports of energy products](#), October 2021, Table 2

¹¹ Eurostat, [EU imports of energy products](#), October 2021, Table 2

Extra EU imports of natural gas from main trading partners, 2020 and first semester 2021
(share (%) of trade in value)



Source: Eurostat database (Comext) and Eurostat estimates



Eurostat, [EU imports of energy products](#), October 2021

“Together with the US, we oppose the use of energy supply as a weapon and geopolitical lever”.

[EU High Representative, Josep Borrell](#), 6 February 2022

Over the last year, Russia has been accused of limiting its supplies of gas, thereby exacerbating the shortages that have been felt in Europe.¹² While Russia has been fulfilling its contractual obligations, it has not provided much additional gas.

One assessment in July 2021 suggested that Gazprom was providing 20% less gas into the European market compared to pre-pandemic levels.¹³ There was subsequent debate about whether Gazprom could do more to increase supply. On 21 September 2021 the International Energy Agency issued a statement which, alongside highlighting global factors affecting gas supply,¹⁴ also expressed the view that Russia “could do more” to increase gas availability in Europe.¹⁵

Stakeholders also expressed concern that Russia may also be limiting supply to keep market prices high and to exert pressure on German regulators to approve the Nord Stream 2 pipeline. Russia has been [accused by some in the UK Parliament of engaging in “hybrid war”](#) and in September 2021, EU lawmakers called on the EU Commission to investigate Gazprom’s role in the gas crisis.¹⁶

However, Russia has denied manipulating the market or attempting to [“weaponise” the energy crisis](#), with President Putin calling it “politically motivated tittle tattle”.¹⁷ Speaking at a Moscow Energy Forum in October

¹² See for example: [“Europe gas prices: how far is Russia responsible?”](#), BBC News, 14 October 2021

¹³ [“Gazprom’s folly: In seeking to deliver Nord Stream 2, it may undermine its own access to EU markets”](#), Atlantic Council, 16 July 2021

¹⁴ Including maintenance issues in Norway, weather related factors and decreased availability of renewable energy.

¹⁵ [International Energy Agency Press Release](#), 21 September 2021

¹⁶ [“What caused the UK’s energy crisis”](#), The Guardian, 21 September 2021 and [“EU lawmakers urge probe of Gazprom’s role in gas-price jump”](#), Bloomberg, 17 September 2021

¹⁷ [“Russia denies weaponizing energy amid Europe gas crisis”](#), BBC News, 13 October 2021

2021, he blamed the current energy crisis on Europe and said that Gazprom was already meeting its commitments under existing contracts. He also said the company was “ready to provide more if requested” and there had been “no refusal” to do so.¹⁸

Yet, the Kremlin also used this opportunity to highlight the benefits of Nord Stream 2 in alleviating the situation. On 15 September 2021, Kremlin Presidential Press Secretary, Dmitry Peskov, was reported by the Russian News Agency TASS as saying that “Obviously, the commissioning of Nord Stream 2 as soon as possible will substantially balance natural gas price parameters in Europe”.¹⁹

The EU High Representative, Josep Borrell, has, on several occasions, called on the EU to better ensure its energy security, arguing that “higher energy prices raise major issues for EU foreign and security policy”,²⁰ and that the EU must reduce its strategic dependencies and the “outsize role that energy considerations play in EU-Russia relations”.²¹

2.2 Implications for Ukraine

Only a year after the annexation of Crimea in 2014, the Nord Stream 2 pipeline was proposed.

While Ukraine is not a major importer of Russian gas, as outlined above, it is a major transit country for pipelines into Europe. Transit fees are thought to account for almost 3% of Ukraine’s GDP. Ukraine expects gas transit revenue of [\\$2-3 billion](#) annually over the next five years, after a transit deal was reached in December 2020 between Russia and Ukraine. Ukraine’s total government revenues were around [\\$50 billion in 2020](#).

The direct supply of gas to Europe via Nord Stream 2 would allow Russia to largely bypass Ukraine, if it so chose,²² which the Ukrainian Government described in 2018 as akin to an “economic and energy blockade”.²³

Indeed, Russia has used energy supplies in the past to pressure Ukraine. In 2006, [Russia cut off all gas to Ukraine](#) in a dispute ostensibly over price and debts accumulated by a Ukrainian gas company. Many thought that Russia

¹⁸ [“Russia denies weaponizing energy amid Europe gas crisis”](#), BBC News, 13 October 2021

¹⁹ [“Nord Stream 2 launch to balance gas price parameters in Europe, says Kremlin”](#), TASS, 15 September 2021

²⁰ EU External Action Service, [EU High Representative’s Blog](#), 14 October 2021

²¹ EU External Action Service, Europe in danger: [Speech by High Representative Josep Borrell](#), 25 January 2022

²² In February 2022 President Putin said that Russia was ready to continue distributing gas through Ukraine if there was demand from European importers, it was profitable and the transit network was in “proper technical shape” (President of Russia, [News conference](#), 15 February 2022)

²³ [Merkel: New Pipeline Impossible Without Clarity For Ukraine](#), Radio Free Europe RadioLiberty, 10 April 2018

was also behaving in a threatening manner to discourage alignment with the West.²⁴ Supplies were reduced again in 2008, 2009 and again in 2014.

As well as threatening Ukraine's transit revenues, bypassing Ukrainian transit routes would also affect eastern European countries that receive most of their gas from Russia via this network. As such, there has been pressure to protect Ukraine as a gas transit country.

US-German Joint Agreement and the waiving of sanctions against NS2

In May 2021 the US waived sanctions on the company building the pipeline, Nord Stream 2 AG, and its CEO, Matthias Warnig. Despite its continued opposition to NS2, sanctions were considered by the Biden administration to be counter-productive to transatlantic relations and therefore in the national interests of the US to waive them. In a statement, the US State Department said:

We will continue to oppose the completion of this project, which would weaken European energy security and that of Ukraine and Eastern flank NATO and EU countries. Our opposition to the Nord Stream 2 pipeline is unwavering. Though we may not always agree, our alliances remain strong, and our position is in line with our commitment to strengthen our Transatlantic relationships as a matter of national security.²⁵

The move was welcomed by the German Government and viewed as a chance towards "normalisation" by Deputy Russian Foreign Minister, Sergei Ryabkov.²⁶ Ukraine criticised the decision, however, reiterating its view that "Nord Stream was Russia's most dangerous geopolitical project".²⁷ Several Republican Congressmen also condemned the waiver suggesting "if the Putin regime is allowed to finish this pipeline, it will be because the Biden Administration chose to let it happen".²⁸

However, in response to ongoing US concerns over Nord Stream 2, in July 2021 the US and Germany announced they had reached an agreement on the pipeline to "prevent it being used as a weapon". In a joint statement they said this could involve sanctions on Russian exports:

Should Russia attempt to use energy as a weapon or commit further aggressive acts against Ukraine, Germany will take action at the national level and press for effective measures at the European level, including sanctions, to limit Russian export capabilities to Europe in the energy sector, including gas, and/or in other economically relevant sectors. This commitment is designed to

²⁴ See for example, European Parliament, Policy Department for External Relations, [Energy as a tool of foreign policy of authoritarian states, in particular Russia](#), April 2018

²⁵ US Department of State, [Nord Stream 2 and European energy security](#), 19 May 2021

²⁶ "[Nord Stream 2: Biden waives US sanctions on Russian pipeline](#)", BBC News, 20 May 2021

²⁷ "[Nord Stream 2: Biden waives US sanctions on Russian pipeline](#)", BBC News, 20 May 2021

²⁸ "[Nord Stream 2: Biden waives US sanctions on Russian pipeline](#)", BBC News, 20 May 2021

ensure that Russia will not misuse any pipeline, including Nord Stream 2, to achieve aggressive political ends by using energy as a weapon.²⁹

Both countries also reiterated their support for “Ukraine’s sovereignty, territorial integrity, independence, and chosen European path” and committed to pushing back against “Russian aggression and malign activities in Ukraine and beyond”.

They also expressed their belief that “it is in Ukraine’s and Europe’s interest for gas transit via Ukraine to continue beyond 2024” and that Germany would seek to facilitate an extension of Ukraine’s gas transit agreement with Russia.³⁰

²⁹ US Department of State, [Joint Statement of the United States and Germany on support for Ukraine, European energy security and our climate goals](#), 21 July 2021

³⁰ US Department of State, [Joint Statement of the United States and Germany on support for Ukraine, European energy security and our climate goals](#), 21 July 2021

3 The current Ukraine crisis

On 22 February 2022 the German Government announced that the certification process for NS2 would be suspended.

Western nations, including the UK, US, EU and NATO allies, warned Russia that taking military action in Ukraine would have [significant economic consequences](#),³¹ and a halt of the Nord Stream 2 project was among those measures under discussion.

Initially there was some ambiguity over whether allies would be united in taking this step. Several senior figures in the new German coalition government, including Chancellor Scholz and the Defence Minister, Christine Lambrecht, had previously argued that as a “commercial project” it should not be linked to Russian-Ukrainian tensions.³² Under pressure from its allies, however, the German Government appeared to shift position and at the end of January 2022 said that, in the event of Russian military action in Ukraine “nothing would be off the table, including Nord Stream 2”.³³

3.1 Suspension of certification

Considered an “ultimate sanction”, few expected Nord Stream 2 to be among initial sanctions measures announced. However, on 22 February, Chancellor Scholz announced that the certification process for Nord Stream 2 would be suspended “for the time being” and that “the geopolitical situation makes a reassessment of Nord Stream 2 imperative”.³⁴

This was in response to Russia’s recognition of the two separatist regions in Ukraine (the Luhansk People’s Republic and Donetsk People’s Republic) and Russia’s deployment of forces to the region under the guise of peacekeepers,

The certification process for the pipeline had already been suspended in November 2021 until the operator of the pipeline met German legal requirements on ownership.³⁵

³¹ White House, [Background press call by Senior Administration officials on Russia Ukraine economic deterrence measures](#), 25 January 2022

³² See The Financial Times, “Germany’s Russia problem: Ukraine crisis tests new Government”, 31 January 2022 and Politico, [“Russian test for Scholz: Ukraine crisis exposes divisions in Berlin”](#), 17 January 2022

³³ Twitter, [German Ambassador to the United States](#), 26 January 2022

³⁴ Federal Ministry for Economic Affairs and Climate Action, [Press release](#), 22 February 2022

³⁵ Bundesnetzagentur, [Certification for Nord Stream 2 suspended](#), 16 November 2021

The German Government has since withdrawn the previous Government's [security of supply analysis](#), which is a prerequisite for certification of the pipeline.³⁶

The US Government has also terminated its waiver on NS2 sanctions (see above) and reinstated them, with immediate effect, on Nord Stream 2 AG, the company that owns the pipeline, and its CEO, Matthias Warnig.³⁷

3.2 Withdrawal of investors

Gazprom has a 50% financial stake in Nord Stream 2 AG. European energy companies ENGIE, Uniper, Wintershall, OMV and Shell are all investors in the project, each committing 10% of the cost of the venture.³⁸

Several investors have said they are considering ending their involvement in the project in protest at Russia's actions in Ukraine.

On 28 February 2022 the Board of Shell plc announced that it will "exit" its joint ventures with Gazprom and any related entities, including the NS2 project. Shell's CEO, Ben van Beurden, has said "Our decision to exit is one we take with conviction. We cannot – and we will not – stand by".³⁹

OMV has said it will "reconsider its participation".⁴⁰ Wintershall has called for compensation;⁴¹ while Engie has said it is "closely following the situation".⁴² Uniper CEO, Klaus-Dieter Maubach, said it was now unclear if, and how, the certification process could be restarted.⁴³

The longer-term future of the pipeline is now tied to the Ukraine crisis and how that may be resolved, all of which is uncertain. Indeed, it has been reported that Nord Stream 2 AG, the company behind the pipeline, is considering filing for insolvency after terminating its employee's contracts.⁴⁴

A statement posted on the Nord Stream 2 AG website states:

³⁶ Federal Ministry for Economic Affairs and Climate Action, [Economic Affairs Ministry transmits supply security analysis in NS2 \[...\]](#), 26 October 2021

³⁷ US Department of State, [Sanctioning NS2 AG](#), 23 February 2022

³⁸ Nord Stream 2 AG, [Press release](#), 12 November 2015

³⁹ Shell plc, [Press statement](#), 28 February 2022

⁴⁰ TASS, ["Austria's OMV will reconsider its participation in Nord Stream 2"](#), 1 March 2022

⁴¹ Financial Times, "Nord Stream 2 backers says Wintershall Dea says it expects compensation for investment", 24 February 2022

⁴² Reuters, ["France's Engie closely following the situation after Nord Stream 2 halted"](#), 23 February 2022

⁴³ S&P Global Market Intelligence, ["Nord Stream 2 financier Uniper 'profoundly unsettled' over Russia-Ukraine crisis"](#), 23 February 2022

⁴⁴ Share Talk, ["Nord Stream 2 owner contemplates insolvency following pipeline halt and sanctions"](#), 1 March 2022

We cannot confirm the media reports that Nord Stream 2 has filed for bankruptcy. The company only informed the local authorities that the company had to terminate contracts with employees following the recent geopolitical developments leading to the imposition of US sanctions on the company.

We can confirm that we have taken down this website due to serious and continuous attacks from outside.⁴⁵

3.3 Support for European energy security

Within the broader context of efforts to reduce Europe's demand for Russian energy,⁴⁶ there are concerns that Russia may continue to “weaponise” gas supplies to Europe in retaliation for any Western sanctions.⁴⁷

At a press conference on 25 January 2022, White House officials indicated the US was “taking steps to ensure that the global energy supply isn’t disrupted”. They added:

should Russia choose to weaponize its natural gas by cutting supply to Europe even more than it’s already done, we’re in discussions with governments and major producers around the world about surging their capacity.⁴⁸

In a joint statement on 28 January, the US and EU confirmed they were “working jointly towards continued, sufficient, and timely supply of natural gas to the EU from diverse sources across the globe to avoid supply shocks, including those that could result from a further Russian invasion of Ukraine”.⁴⁹

⁴⁵ [Nord Stream 2 AG](#)

⁴⁶ In July 2021 the US and Germany outlined [a number of initiatives](#) intended to reduce the demand for Russian energy, particularly in Central and Eastern European countries.

⁴⁷ See Atlantic Council, [“Ukraine crisis: will Putin deploy his energy weapons against Europe?”](#), 30 January 2022; The Times, [“Fears mount Russia will weaponise gas supplies over Ukraine crisis”](#), 23 January 2022

⁴⁸ White House, [Background press call by Senior Administration officials](#), 25 January 2022

⁴⁹ European Commission, [Joint statement by President von der Leyen and President Biden on US-EU cooperation on energy security](#), 28 January 2022

4 UK Government position

The UK imported 2.3 billion cubic metres of gas from Russia in 2020, or 3% of its gas supply.

International Energy Agency: Natural gas information (2021 edition)

Although the UK imports only a small amount of gas directly from Russia, the UK has a vested interest in European energy security, the interests of Ukraine and the effect of Russian actions more broadly.

Successive governments have raised objections over Nord Stream 2, arguing “It is not necessary to meet future European demand for gas and could harm European energy security and the interests of Ukraine”.⁵⁰ In June 2021, the Government confirmed its focus continues to be “supporting resilient European energy markets,” including measures that diversify supply.⁵¹

On 31 January 2022, Foreign Secretary Elizabeth Truss welcomed statements by the German Government “in which they were very clear that it [NS2] will not go ahead in the event of a Russian incursion”. She reiterated that European dependence on Russian gas supplies must be reduced and supported recent US and EU efforts on security of supply, indicating the UK was “working with partners across the Middle East”.⁵²

The Government has since welcomed Germany’s suspension of the certification process.⁵³

As Nord Stream 2 is not a UK project, [Russian sanctions legislation](#) introduced by the Government on 10 February 2022 does not specifically mention the pipeline.⁵⁴ However, the legislation will allow the UK to target the strategic interests of the Russian state more broadly, including the energy sector and specific companies such as Gazprom who owns Nord Stream 2.

1 Further reading

- Congressional Research Service, [Russia’s Nord Stream 2 natural gas pipeline to Germany](#), December 2021
- European Parliament Research Service, [The Nord Stream 2 Pipeline](#), July 2021
- Atlantic Council, [“Europe’s energy crisis highlights dangers of reliance on Russia”](#), 10 October 2021

⁵⁰ PQ242893, 15 April 2019

⁵¹ HL422, Nord Stream 2 pipeline, 7 June 2021

⁵² HC Deb 31 January 2022, [Russia: sanctions](#), c65

⁵³ HL Deb 25 February 2022, [Ukraine](#), c523

⁵⁴ [The Russia \(Sanctions\) \(EU Exit\) \(Amendment\) Regulations 2022](#)

- [European Council on Foreign Relations, “The Nord Stream 2 dispute and the transatlantic alliance”](#), 20 April 2021
- [Politico, Opinion Piece by the Polish Foreign Minister and Ukrainian Foreign Minister: “Nord Stream 2 has damaged the West enough. Time to put an end to it”](#), 22 February 2021
- [NATO Review, “Energy security in the era of hybrid warfare”](#), January 2021
- [RUSI Newsbrief, “Nord Stream II: the battle lines have been drawn”](#), June 2018

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