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Swedish Environmental Protection Agency

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cc: Richard Kristoffersson

Notification by Sweden on Baltic Offshore Delta (Your number NV-00618-22)

Answer to the notification in accordance with Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) for a planned offshore wind farm Baltic Offshore Delta in Sweden's EEZ

The Ministry of the Environment acknowledges that Finland received a notification from Sweden concerning the start of an environmental impact assessment procedure (EIA) of a planned offshore wind farm, Baltic Offshore Delta, in the Baltic Sea in Sweden's exclusive economic zone (EEZ). The developer of the project is Njordr Offshore Wind AB. The notification was made in accordance with Article 3 of the Espoo Convention. Included in the notification was a consultation document. The original deadline for Finland's answer was postponed until 6 April due to the translation of the consultation document into Finnish to enable the public hearing.

The Ministry of the Environment gave the opportunity for the public and the authorities to comment on the material from 28 February to 25 May 2022. The material was displayed on the Ministry's website. Eleven answers were received and a summary of the comments is given below. The given statements are enclosed to this letter and should be considered in their entirety.

The Government of Åland expresses its wish to participate in the EIA. It is important to consider the negative impact on migratory birds that use the area for staging and wintering as well as impacts on fishing and fish spawning grounds. Ship traffic and proximity to large waterways must be taken into account.

The Ministry of Agriculture and Forestry wants Finland to participate in the EIA. The impacts on professional fishing needs to be assessed properly with more sufficient data and maps than in the consultation report. The building of offshore wind farms will reduce the suitable area for fishing, so also the cumulative reduction of such areas should be considered. The potential positive impact of the project for fish stocks at the ecosystem level of the Baltic Sea should not be exaggerated.

The occurrence of all fish populations during their whole life cycle should be investigated in the potentially affected area. The impact of the project on the migration of salmon stocks (both their migration to the main Baltic Sea basin for



feeding, as well as their spawn migration to the salmon rivers) need to be investigated. The studies should include both the construction and the operating period.

The possibility for Finns to fish in the planned area is based, among other things, on the regulation of the EU Common Fisheries Policy (1380/2013). The implementation of the project would reduce the possibilities of utilizing the right of access to Swedish waters granted by the EU legislation and also of utilizing the EU right to fish quotas and their exploitation. In general, the developer should investigate comprehensively, in particular, the aspects of fishing under EU law while as a rule all EU Member States in the Baltic Sea have the right to fish in the area.

The Ministry of Transport and Communications supports the participation in the EIA. The project must consider the unimpeded use of waterways, radar systems and safety in maritime transport. It is also essential that the windfarm does not interrupt the use of radio frequencies. The Ministry makes reference to Traficom's statement on winter navigation.

The Ministry of Defence considers no need to participate from its administrative sector's point of view.

Traficom (Transport- och kommunikationsverket) supports the participation in the EIA. The EIA should also use maritime charts to point out relevant information for navigation. When the developer defines the project area, the Traffic Separation Schemes (TSS) need to be taken into account. It must also be noted that vessels use routes outside the confirmed routes and TSS.

The cumulative impacts of offshore wind power projects on navigation should be considered. When the amount of wind farms increase over time, they may impact the winter navigation to the Gulf of Bothnia. The competent authorities in charge of the winter navigation and icebreaking should be consulted in all offshore windfarm projects in the EEZ. In Finland this authority is the Finnish Transport Infrastructure Agency (Trafikledsverket).

BirdLife Finland is of the view that Finland should participate in the EIA even if it is likely that the main routes of larger birds migrating during the daytime do not cross the planned area and significant impacts are therefore not very likely. However, there is no information on birds migrating during the nighttime. Signal lights of wind power plants can attract birds to a great extent in some weather conditions. It is important that the project includes radar monitoring covering both spring and autumn migration periods to determine the magnitude and height of night migration in the area and to assess the risk of collision.

It is particularly important to assess the possible impacts of the project on the whole migration route taking into account also other projects along the migratory



pathways. The cumulative impact of several projects may have population level effects.

Suomen Ammattikalastajat ry (Finlands Yrkesfiskarförbund r.f.) considers it essential that Finland participates in the EIA.

The extensive construction of wind power parks will change the environment and have an impact on the state of the marine environment, fish stocks, birds as well as fishing. The impacts of the project on the natural conditions, fish stocks and fishing in the north main basin must be thoroughly investigated and the information obtained must be critically examined. Professional fishers and the Association of Finnish Fishers are very concerned about this development, as the cumulative impacts of different projects on nature and fish stocks have not been studied sufficiently. In practice, large marine areas will become closed to fishing. The association has also published a more general statement on offshore wind power planning and the link is provided in the statement.

Natur och Miljö rf. considers it beneficial that Finland participates in the EIA. The consultation document addresses many key issues regarding the environmental impact of the planned wind farm and those are important to be investigated carefully. It is particularly urgent to minimize damage risks to migrating bird species. Construction methods and techniques must minimize high noise levels and reduce the spread of bottom sediments during construction as high levels of sediment in the water can negatively affect the reproduction of several fish species. Investigating the impact of electromagnetic fields on fish and eel stocks in the areas affected by wind turbines is also important. The Association may be able to contribute to the environmental assessments.

Metsähallitus (Forststyrelsen) does not see the need to participate in the EIA.

The Finnish Meteorological Institute and the **Natural Resources Institute Finland** replied that they had no comments.

Based on the received comments, and reflecting its own views, the Ministry of the Environment states that Finland will participate in the EIA of the project. The EIA documentation should address properly the transboundary impacts and in this respect a separate chapter is proposed looking at the environmental impacts from Finland's point of view.

Assessing the cumulative impacts on the Baltic Sea as a whole is important as the planning of offshore wind farms is very active within the region at the moment. It is essential to find ways to mitigate cumulative impacts of various nature in each wind farm planning process. In this project, the impacts on fish, fishing, maritime safety and migratory birds have been highlighted. The Ministry wishes to point out also the importance to assess the project's impact on the Baltic proper Harbour Porpoise population, which is Critically Endangered (CR). The planned



project is situated in an area that is important for these Harbor Porpoises and the wind farm may affect seriously the health (hearing) and the movement patterns of the species within this area as well as links with other areas. In this respect underwater noise must especially be evaluated and actions on mitigating the impacts of the project related to underwater noise must be included into the assessment. Thereby planning (e.g. seismic surveys), building and operating phases need to be considered. The Convention on the Conservation of Migratory Species of Wild Animals (CMS) has information on such assessments which can be obtained e.g. from the following links [CMS Family Environmental Impact Assessment Guidelines for Noise-generating Offshore Industries: Implementation Report](#) and from the web site of [CMS](#).

Many factors influence the state of the Baltic Sea and, consequently, the status of e.g. seabirds, fish, the Harbour Porpoise and their habitats. In addition to wind power plants, other threats also affect the status of many species, including harmful substances and being caught as bycatch. This kind of data can be taken into account when describing the current state of the environment and when forming the basis to anticipate cumulative impacts, which may prove fatal. All contributing factors must be known and their impacts, including far-reaching ones, assessed, in order to ensure that the decision on the implementation of the project is based on firm knowledge of its impacts and on the best possible solution.

In particular, Finland wishes to stress the need to take into account relevant international obligations, decisions and guidance adopted under AEWA, ASCOBANS HELCOM, the Convention on Migratory Species etc. with respect to windfarm development and the need to restore and maintain key habitats and species in a favourable conservation status.

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