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Swedish Environmental Protection Agency

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Notification by Sweden on Najaderna OWF (NV-06832-22)

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 “Najaderna” 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, “Najaderna”, in the Baltic Sea in Sweden's exclusive economic zone (EEZ). The developer of the project is Eolus Vind AB. The notification was based on Article 3 of the Espoo Convention. Included in the notification was a consultation document.

The Ministry of the Environment gave the opportunity for the public and the authorities to comment on the material from 5 September to 26 September 2022. The material was displayed on the Ministry's website. Answers were received from the following parties: Government of Åland, Ministry of Transport and Communications, Finnish Heritage Agency, Centre for Economic Development, Transport and the Environment in Southwest Finland, Ministry of Defense, Traficom (Transport- och kommunikationsverket), Finnish Transport Infrastructure Agency (Trafikledsverket), Finnish Wildlife Agency, Natural Resources Institute Finland, BirdLife Finland, Finnish Association for Nature Conservation, Finnish Shipowners' Association, Suomen Ammattikalastajat ry (Finlands Yrkesfiskarförbund r.f.) and WWF Finland. The given statements are enclosed to this letter and need to be considered in their entirety.

Based on the received comments, and reflecting its own views, the Ministry of the Environment states that Finland will participate in the EIA procedure. The EIA documentation should properly address the transboundary impacts and in this respect, the Ministry proposes that a separate chapter looking at the project's environmental impacts from Finland's point of view is included in the EIA documentation. Furthermore, the Ministry wishes that the following aspects are taken into consideration in the EIA documentation.

In addition to the proposed wind farm's independent impacts, the cumulative impacts of the multiple offshore wind farms that are being planned in the Baltic Sea and particularly in the Gulf of Bothnia should be given consideration in the



EIA documentation. The cumulative impacts of these projects should be properly assessed to best mitigate harmful impacts in the wider area and ecosystem of the Baltic Sea. These assessments should take into account the objectives for prevention, protection and conservation of the marine environment as set in EU legislation and strategy.¹ Many factors influence the state of the Baltic Sea and its ecosystem. 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 solutions.

The proposed offshore wind farm could independently and cumulatively with other proposed wind farms have impacts on the navigation of maritime transport to the ports of the Baltic Sea particularly during wintertime. This issue can have an impact on the environment in case of maritime accidents. Restricting route options in maritime traffic can also extend the traveling distances of vessels and consequently increase emissions from maritime transport. In assessing the impacts on maritime transport and safety, the EIA documentation should also take into account the shipping routes outside the confirmed routes and the route allocation systems. The Ministry proposes that the competent authority in charge of the winter navigation and icebreaking as well as the competent authority in charge of maritime safety in Finland are consulted for the EIA documentation and for the projects future execution to ensure maritime safety and prevent maritime accidents with potentially harmful impacts on the environment.²

The proposed wind farm's impacts should also be thoroughly investigated with regard to bird migration and foraging in the area. Bird species are known to be sensitive to disturbance caused by offshore wind farms in the open sea. The EIA documentation should address the project area's importance to bird foraging with a comprehensive aerial survey during the open water season. The International Single Species Action Plans for migrating waterfowl as set in AEWA should also be taken into account in the project's planning with regard to the species the project might impact. AEWA guidelines on how to avoid, minimize or mitigate the impact of infrastructural developments affecting waterfowl should also be considered.³

The project is located particularly along the migration routes for Greylag and Bean geese. All known methods to minimize the collision mortality of these geese species as well as other migrating bird species should be implemented in the technology, location and coloration of the proposed wind farm. The possibility of positioning the wind turbines in a way that minimizes their air space in relation to

¹ The marine strategy framework directive (2008/56/EC), EU Biodiversity Strategy for 2030 (COM (2020) 380 final).

² The competent authority in charge of the winter navigation and icebreaking: the Finnish Transport Infrastructure Agency (Trafikledsverket). The competent authority in charge of maritime safety: Ministry of Transport and Communications, Traficom (Transport- och kommunikationsverket) and Finnish Transport Infrastructure Agency.

³ Relevant AEWA links can be found in the Finnish Wildlife Agency's statement.



bird migration routes should be investigated. The Ministry also proposes radar monitoring covering the spring and autumn migration periods to establish the magnitude and height of bird migration in the area and to assess the risk of collisions. Radar monitoring could also be used to assess the project's impacts on migrating bat species in the area.

The project in addition with other similar projects in the area could also affect marine fauna due to underwater noise. Particularly fish populations in the area of the operating wind farm could be affected. This could also impact commercial fishing in the immediate and wider reaching area of the Bothnian Sea, which is an important area for the Finnish fishing industry. The impacts on fish populations and commercial fishing should be adequately assessed in the EIA documentation and in cooperation with both Finnish and Swedish fishing industry operators.

With regard to the contents of the consultation document, the Ministry would like to note that the consultation document did not include any mention of transboundary impacts. The application of the Espoo Convention necessitates that the current state of the environment and environmental impacts of the proposed project are described and assessed from the affected party's perspective.

To conclude, the Ministry wishes that the EIA documentation includes a separate chapter for transboundary impact assessments with specific regard given to bird migration and foraging, maritime safety, fish populations, marine fauna and commercial fishing from Finland's perspective.

Director General

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Specialist

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Enclosure

Statements from Finland