Ympäristöministeriö
Miljöministeriet
Ministry of the Environment
Finland

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Swedish Environmental Protection Agency
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cc: Richard Kristoffersson (SEPA), Emma Sjöberg (Ministry of the Environment in Sweden)

Notification by Sweden on Polargrund Offshore wind farm (Your number NV-06840-22)

Answer to the Espoo Convention notification concerning a planned Polargrund Offshore wind farm in Sweden's territorial waters and 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, Polargrund Offshore, in the Bothnian Bay in Sweden's territorial waters and exclusive economic zone (EEZ). The plan is to produce either electricity or hydrogen. The developer of the project is wpd Offshore Sweden. The notification was based on Article 3 of the Espoo Convention[1]. 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 provided material from 29 August to 21 September 2022. The material was displayed on the Ministry's website. In favour of participating to the EIA of the project were Traficom (Transport- och kommunikationsverket), Centre for Economic Development, Transport and the Environment in Lapland (NMT-centre in Lapland[2]), Centre for Economic Development, Transport and the Environment in North Ostrobothnia (NMT-centre in North Ostrobothnia), Finnish Transport Infrastructure Agency, Finnish Wildlife Agency, BirdLife Finland, Finnish Association for Nature Conservation and Suomen Ammattikalastajat ry. (Finlands Yrkesfiskarförbund r.f). Ministry of Defence, Finnish Heritage Agency, Finnish Meteorological Institute and Natural Resources Institute Finland did not see the need to participate in the EIA.

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. Part B of the project is bordering Finland's EEZ and the material mentions transboundary impacts, however the topic has not been dealt with in a manner that would have been desirable at this stage. In the next stage, the EIA report must contain an assessment, including mitigation measures, with sufficient accuracy and appropriate methods so, that drawing conclusions on the significance of transboundary environmental impacts is possible. It is good that the developer has proposed a separate chapter to deal with environmental impacts in Finland.

[1] Convention on Environmental Impact Assessment in a Transboundary Context
[2] Närings-, trafik- och miljöcentralen

Finland expects that this chapter describes also the current state of the environment in the affected area in Finland with the same accuracy as in Sweden. The given statements already provide central information to the developer in this respect[3] and they also include important information to use in the scoping of transboundary impacts.

The given statements point out the importance of assessing at least the following transboundary environmental impacts,

- changes in the environment, especially in the underwater environment including sediments, underwater noise, increase of salt and heat load from hydrogen production (NMT-centre in North Ostrobothnia), hazardous substances (see point below on risks),
- sea mammals, especially Baltic ringed seal (Finnish Wildlife Agency),
- migratory birds and bats (NMT-centres in Lapland and in North Ostrobothnia, Finnish Wildlife Agency, BirdLife Finland, Finnish Association for Nature Conservation),
- fish fauna and fishing, especially sea trout, anadromous whitefish of Bothnian Bay and salmon (NMT-centre in Lapland, Natural Resources Institute Finland, Finlands Yrkesfiskarförbund r.f.),
- shipping and maritime safety[4] (Traficom, Finnish Transport Infrastructure Agency, NMT-centre in North Ostrobothnia),
- risks of oil accidents of service and construction vessels as well as the constructions (generators). Such accidents might occur in the building phase, during maintenance and later in the demolition phase,
- Natura 2000 area, landscape, built environment, tourism (NMT-centre in North Ostrobothnia),
- environmental objectives of water framework directive and marine strategy framework directive (MSFD)[5].

The issues and concerns taken up in the statements must be considered in their entirety. The statements are enclosed to the letter.

The offshore wind farm Halla is under planning and undergoing an EIA in Finland. The project has been notified to Sweden. Even though assessing the cumulative

[3] The Espoo Convention also allows the Party of origin to request information on the current state of the environment from the affected party (Article 3 paragraph 6). NB Surveys have been carried out in the area in Finland and also in two joint Finnish and Swedish projects: SEAmBOTH and Seacombo.
[4] The competent authority in charge of the winter navigation and icebreaking, the Finnish Transport Infrastructure Agency (Trafikledsverket) must be consulted.
[5] Finland's MSFD outcomes including the environmental targets and the programme of measure (in Finnish and Swedish) are availabe at https://www.ymparisto.fi/fi-fi/meri/Merenhoito.

impacts of several separate projects, especially taking place in different countries, is challenging, Finland and Sweden and the developers should find ways to include a cumulative assessment of these known projects to the Bothnian Bay's environment. Assessing the cumulative impacts on the Baltic Sea as a whole is would also be vital as the planning of offshore wind farms is very active within the region at the moment. It is essential to find ways to mitigate harmful impacts of various kind in each wind farm project.

Many factors influence the state of the Baltic Sea and, consequently, the status of e.g. seabirds, fish, sea mammals and their habitats. In addition to wind power plants, other threats also affect the status of many species, including harmful substances, effects of noise 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 assessed, including far-reaching ones, in order to ensure that the decision on the implementation of the project is based on firm knowledge of the impacts and on the best possible solution.

In particular, Finland wishes to stress the need to take into account relevant EU and international obligations, including decisions and guidance adopted under the Convention on Migratory Species (CMS) [6]: AEWA[7] and ASCOBANS; and also under HELCOM, EUROBATS etc. with respect to windfarm development. These aim for the need to restore and maintain key habitats and species in a favourable conservation status.

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Enclosure Statements from Finland

[6] 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 Noisegenerating Offshore Industries: Implementation Report and from the web site of CMS.
[7] Links provided in the Finnish Wildlife Agency's statement.