Ympäristöministeriö
Miljöministeriet
Ministry of the Environment
Finland

Diaarinro
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Ministry of the Environment of Estonia
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Notification by Estonia on Saare-Liivi OWF (16-3/22/2464-5)

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 “Saare-Liivi” in the Gulf of Riga

The Ministry of the Environment acknowledges that Finland received a notification from Estonia concerning the start of an environmental impact assessment procedure (EIA) of a planned offshore wind farm, “Saare-Liivi”, in the Gulf of Riga near the island of Kihnu. The developer of the project is Utilitas Wind OÜ. 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 26 September to 24 October 2022. The material was displayed on the Ministry’s website. The following parties considered that Finland should participate in the EIA procedure and included comments in their statements: Suomen Ammattikalastajat ry, Natur och Miljö fr, Finnish Association for Nature Conservation, WWF Finland and the Finnish Wildlife Agency. Government of Åland, Finnish Heritage Agency, Traficom and the Finnish Transport Infrastructure Agency did not consider their participation in the EIA procedure necessary. Ministry of Agriculture and Forestry of Finland and the Finnish Meteorological Institute did not give a statement. 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 area of the Baltic Sea 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 wind farm's impacts should 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. Offshore wind farms built where the sea is under 35 meters deep can especially affect waterfowl foraging, which should be taken into account in the EIA documentation. The EIA documentation should address the project area's importance to bird foraging with a comprehensive aerial survey during the open water season.

The project is located particularly along the migration route of the Greylag Goose (Anser anser). The project area is also located near the Pärnu Bay IBA (Important Bird Area), which is of particularly critical importance for the Velvet Scoter (Melanitta fusca) and the Long-tailed Duck (Clangula hyemalis). The project's possible impacts on the foraging and migration of these species should be thoroughly addressed. 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 these and other species the project might impact. AEWA guidelines on how to avoid, minimize or mitigate the impact of infrastructural developments affecting waterfowl should as well be considered.[2]

All known methods to minimize the collision mortality of the aforementioned species as well as other migrating bird species should be implemented in the technology, location and coloration of the proposed wind farm. The structure and blades of the wind turbines should be made easily noticeable to migrating birds. The possibility of implementing automated stop technology in the wind turbines during the height of bird migration as well as the possibility of positioning the wind turbines in a way that minimizes their air space in relation to bird migration routes should be investigated.[3] 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. The Ministry notes that the generally increasing height and width of the structure and blades of modern wind turbines can pose new and increased risks to bird migration in the

[1] The marine strategy framework directive (2008/56/EC), EU Biodiversity Strategy for 2030 (COM (2020) 380 final).
[2] Relevant AEWA links can be found in the Finnish Wildlife Agency's statement.
[3] Further details on possible mitigation measures for collision mortality can be found in the Finnish Wildlife Agency's statement.

area of the Baltic Sea, which should be taken into account in the project's planning.

The project in addition with other similar projects in the area of the Baltic Sea could also affect marine fauna due to disturbance caused by construction and underwater noise during operation. Wind farm construction physically alters the benthic community e.g. mussel beds, particularly where cables and turbine foundations are established. Fish populations in the area of the operating wind farm could also be affected by the underwater noise. Impacts on the benthic community and fish populations can have an effect on waterfowl foraging in the area as well. The project's impacts on fish populations and the benthic community during construction and operation should be adequately assessed in the EIA documentation.

The Ministry would like to note that it maintains its earlier comments included in its previous letter sent to the Ministry of the Environment of Estonia on 6.4.2022. The previous letter is attached to this letter and should also be considered in its entirety when conducting the EIA procedure especially with respect to the project's possible impacts on bird species.

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, fish populations and marine fauna from Finland's perspective.

Permanent Secretary — Juhani Damski

Specialist — Anniina Kaikkonen

Enclosure — Statements from Finland

Finland's letter to Estonia on 6.4.2022