



7.11.2022

Swedish Environmental Protection Agency

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cc: Richard Kristoffersson

Sweden's notification of the Espoo Convention (Your reference NV-08204-22 "Södra Victoria")

Finland's answer to the notification for a planned offshore wind farm Södra Victoria

Finland acknowledges receiving a notification from Sweden concerning the start of an environmental impact assessment procedure (EIA) of a planned offshore wind farm Södra Victoria located to the west of the Södra Midsjöbanken in Sweden's exclusive economic zone. The notification was made in accordance with Article 3 of the Espoo Convention. Included in the notification was a consultation document (samrådsunderlag) which corresponds to a scoping document. Developer is RWE Renewables Sweden AB.

A project by the same developer (former name E.ON Wind Sweden AB) has been in the Espoo Convention's consultation process earlier by the name of Södra Midsjöbanken. Due to the objections raised by authorities and experts in Sweden's permitting procedure for locating the facility at the Södra Midsjöbanken, the developer has revised its plans and proposes a different location, and therefore the EIA is launched again.

Ministry of the Environment gave the opportunity for the public and the authorities to comment on the material from 6 to 28 October 2022. The material was displayed on the Ministry's website.

Ten statements were received. The following considered that Finland should participate in the EIA and included comments in their statements: Ministry of Transport and Communications, Natural Resources Institute Finland, Traficom (Transport- och kommunikationsverket), BirdLife Finland, Finnish Association for Nature Conservation and WWF Finland. Government of Åland, Finnish Heritage Agency and Finnish Meteorological Institute did not consider their participation in the EIA necessary. Metsähallitus (Forststyrelsen) did not give a statement. The given response is enclosed and needs to be considered in its entirety.

Based on the statements received and reflecting its own views, the Ministry of the Environment states that Finland wishes to participate in the EIA of the project. Even though the intended location of the wind farm is changed, the impacts on



migratory birds¹, Harbour Porpoise, fish, fishing and also maritime navigation including maritime safety² can still have likely significant transboundary elements.

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 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](#).

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 (like oilspills) 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.

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 harmful impacts of various nature in each wind farm planning project. As the EIA will include alternatives, the project should look for alternative sites outside the IBA and Natura 2000 areas.

It is good that the developer proposes to include a chapter on transboundary impacts in its EIA report. However, the current material did not include any substance on transboundary impacts. Such information would have been easy to compile from the earlier EIA process. According to Article 3 of the Espoo Convention, already the notification should include any available information on project's possible transboundary impact. It must be highlighted that the

¹ See statements by Natural Resources Institute Finland, BirdLife Finland, Finnish Association for Nature Conservation and WWF Finland.

² See statements by Ministry of Transport and Communications and Traficom (Transport- och kommunikationsverket).



application of the Espoo Convention does not mean that the material is produced only from the national perspective and then translated.

As a note to the Swedish Government, Finland wishes to note, once again, that the EIA material from Sweden seems almost systematically lack information on transboundary impacts. Finland requests that Sweden will take quick and concrete measures to improve the situation so that the change would also be visible in practice.

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