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Swedish Environmental Protection Agency

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cc: Richard Kristoffersson

Notification by Sweden on Eystrasalt Offshore (Your number NV-02980-21)

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 in the Sea of Bothnia in Sweden's EEZ, Eystrasalt Offshore

Finland acknowledges receiving a notification from Sweden concerning the start of an environmental impact assessment procedure (EIA) of a planned offshore wind farm in the Sea of Bothnia in Sweden's exclusive economic zone (EEZ), Eystrasalt Offshore. 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.

Ministry of the Environment gave the opportunity for the public and the authorities to comment on the material from 27 April to 18 May 2021. An announcement was also published in two national newspapers. The material was displayed on the Ministry's website.

Thirteen answers were received and a summary of comments is given below. The given statements and views in their entirety are enclosed to this letter.

The Government of Åland expresses its wish to be informed of the continuation of the EIA process and of the further work of the offshore windfarm.

Ministry of Agriculture and Forestry supports the view that Finland should participate in the EIA of the project. The Ministry points out that its observations are preliminary at this stage.

The consultation document does not comprehensively evaluate fish stocks or impacts on fishing. The occurrence of all fish populations during their whole life cycle should be investigated in the potentially affected area. Impact of the project on the migration of salmon stocks (including eating-hike in main Baltic Sea basin,



and their way for spawning to the salmon rivers) needs to be investigated. The studies should include both the construction and the operating period.

The planning area is very central for Finnish Baltic herring fishing. In recent years, catches have varied between 5 and 8 million kilos, representing a significant proportion of fishing opportunities for Baltic herring in the Gulf of Bothnia. Finnish catches should be comprehensively examined at least for the last ten years, and additionally reasoned estimates for alternative fishing areas should be presented.

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.

Metsähallitus (state owned enterprise that manages and protects state-owned land and water areas) considers that Finland should participate in the EIA of the project.

Eystrasalt offshore project would be the first project of this magnitude in the Baltic Sea. Since the project is exceptionally large the biota may be affected in Finnish marine protected areas and public waters.

Finnish Heritage Agency. The underwater cultural heritage sites consist of historic shipwrecks and parts of the wreckage in the open sea areas. In the view of the Agency, the wrecks are located in permanent physical locations with possible historical connections with different states. Exchange of information is important for understanding the background of sites, which also benefits the underwater protection of cultural heritage. Similarly, it is important that in the planning of large construction projects also potential impacts on underwater cultural heritage is assessed in the EEZ.

The Agency does not consider it necessary to participate in the EIA of the project as mapping, protection and research measures on wrecks cannot be considered to have actual transboundary environmental impacts.

Centre for Economic Development, Transport and the Environment in Southwest Finland considers that the participation in the EIA is necessary. It also considers that the direct impacts of the potential sea cable and its connecting point to the mainland in Finland should be the main focus of the assessment for Finland. If implemented, the project would affect also the overall planning of the marine areas in Finland including the development of offshore wind power projects.



The planning should take into account the living conditions of birds, fish and the fishing industry in an overall way.

Centre for Economic Development, Transport and the Environment in South Ostrobothnia considers that Finland should participate into the EIA.

The Centre sees that the most central impacts of the project would stem from the possible connecting cables to Finland's electricity transmission system. However, those issues are not described in more detail in the material. The cables could also affect land use planning as well as underwater and shore nature in Finland.

Finnish Environment Institute considers that Finland should participate in the EIA procedure of such an extensive project.

The construction of a large offshore wind park may have an impact on the flow conditions and sedimentation of the sea. These have been observed, for example, in studies carried out in the North Sea.

The construction may also cause significant disturbance to the bottom sediment. The movement of the bottom sediment to the water column may result in the transfer of harmful substances and nutrients bound to particles. Changes in marine hydrography may contribute to the permanence of impacts.

Changes in the structure of the sediment and the movement of the bottom sediment may affect the seabed biota and, consequently, certain fish. Also other impacts on food web are possible.

Wind turbines may also have transboundary impacts on seabirds. Impacts have been observed in wintering waterfowl in the southern Baltic Sea and along the Estonian coast. In Finland, the threat may be directed at, e.g. auks that eat far away in the open sea.

The likely transboundary impacts on Finland's sea area should be clarified by flow modelling, studies evaluating transboundary changes in the food web and assessing effects on birds and mammals.

Finnish Meteorological Institute recommends that Finnish authorities participate in the project.

The Northern Baltic Sea provides favorable conditions for the massive additional construction of wind power, but the location of wind farms must be selected so, that they do not harm the marine environment. Large-scale wind park, like Eyrasalt, will cause changes in flows and biota in the seabed that may be reflected in the viability of fish stocks. The planned area is quite close to the Finnish EEZ, but at this stage it cannot be assessed if the area of impact will extend to Finland.



The Regional Council of Satakunta considers it necessary for Finland to participate into the EIA of the project and emphasizes the importance of an open, interactive and sufficiently broad assessing process in such large-scale offshore wind energy projects.

The Council wishes to highlight the recently approved Finnish Maritime Spatial Plan 2030, which should be taken into account in the transboundary assessment. It identifies wide potential areas suitable for offshore wind power development in the vicinity of the Finnish-Swedish EEZ, close to the project area. The plan is not legally binding, its effectiveness is rather based on extensive stakeholder cooperation and coordination of the objectives of different sectors.

In the drafting phase of the Finnish Maritime Spatial Plan, the Swedish Maritime Authority (Havs och vattenmyndighet) stated that there is a potential need to investigate the cumulative effects of wind power production areas, and impacts in particular on birds, and to shipping. The effects of possible sea cabling have also been identified.

Based on the given material, the environmental values of the shallow area seem to be in the main focus. The assessment must also consider possible impacts on the Finnish side. These include impacts on birds, fish and fishery. It has been stated in the document, that information on commercial fishing is still incomplete. The Regional Council considers it important that Finnish commercial fishermen are taken into account and given the possibility to participate in the assessment procedure. Impacts due to the transfer of energy and sea cables should be assessed extensively. The positioning of sea cables must take into account the potential offshore wind power projects on Finland's side. Impact assessment must pay attention to shipping and varying ice conditions in the area. The cumulative impacts of Finnish and Swedish offshore wind power areas should also be assessed.

The Regional Council of Southwest Finland did not deliver a statement.

The Finnish Coordination Group for Maritime Spatial Planning (Regional Councils of Kymenlaakso, Helsinki-Uusimaa, Southwest Finland, Satakunta, South Ostrobothnia, Ostrobothnia, Oulu Region and Lapland and the Ministry of the Environment) sees it important that quarters responsible for Finland's maritime spatial planning coordination and other key authorities and stakeholders participate in the EIA in Sweden. The assessment of direct and indirect transboundary and cumulative impacts on sea, biota, climate and biodiversity are considered important.

The Coordination Group considers that the scoping document identifies professional fishing and shipping, significant cultural and nature values, and human activities at sea. The document highlights quotations from the maritime spatial plan prepared by Havs- och vattenmyndighet for the Gulf of Bothnia that support the increasing energy production. However, the planned wind park is not



located in the areas planned for energy in the Marine Spatial Plan, but in the area B140 that is designed for general use without prioritizing maritime operators.

To keep the overall development of energy production predictable and controlled, it is seen important, that the development of offshore wind power focuses primarily on areas identified for energy in the marine spatial plan.

The planning area of the project is an important catchment area for Baltic herring used by Finnish fishermen. The project must identify the fishing areas of Finnish professional fishermen in the Swedish sea area and the impacts the project can have on their operational preconditions.

There are several wind energy development projects in the Bothnian Sea and the area is seen central also in the near future in the marine spatial plans of Sweden and Finland. The cumulative impacts of the overall development should stay controlled in order not to cause negative effects. In order to control cumulative effects, not even a single project can cause significant or transboundary impacts. For example, the noise of the Eystrasalt Offshore project (Figure 17) is estimated to reach Finland's EEZ.

It must be noted that Eystrasalt project is situated at its shortest only 13 km from the Finnish EEZ and close to the area identified potential for offshore wind energy in Finland's marine special plan (see picture in the statement).

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

The planned windfarm area and its vicinity constitute a significant fishing area for Finnish professional fishing. The Eystrasalt region is important for fish as reproduction, growth and/or foraging especially for Baltic herring. The impacts of the project on natural conditions and fish stocks in the Sea of Bothnia, as well as on fishing, must be thoroughly investigated and the information obtained must be critically examined.

Fingrid Oyj. No concrete connections to the Finnish transmission system have been presented in the consultation material, so the Finland's transmission system operator Fingrid Oyj has 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 views in the given statements should be taken into account in the EIA. It has been highlighted in several statements that Finnish authorities and stakeholders wish to be included in the actual assessment process, instead of only giving comments on the EIA documentation afterwards. The developer is urged to take this into account in its process.



The consultation material points out that the developer may investigate possible cable options also to Finland. This would extend the project also to Finland's EEZ, territorial waters, landing points and create a need to investigate reinforcement of the existing transmission system. Taking into account the European Court of Justice rulings and the Commission guidance (*Guidance on the Application of the Environmental Impact Assessment Procedure for Large-scale Transboundary Projects 2013* and *Interpretation suggested by the Commission as regards the application of the EIA Directive to ancillary/associated works 2012*) an EIA would be also needed in Finland. As the windfarm and its transmission system form a coherent whole, the Ministry of the Environment is of the view that their planning and EIA should be done at the same time in order to assess the overall impacts of the whole project as well as its cumulative impacts.

Permanent secretary

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Enclosure

Statements and views from Finland