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VN/7853/2022

21.4.2022

Swedish Environmental Protection Agency

registrator@naturvardsverket.se

cc: Richard Kristoffersson

Notification by Sweden on Fyrskeppet (Your number NV- 01248-22)

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 Fyrskeppet in Sweden's EEZ

The Ministry of the Environment acknowledges that Finland received the notification from Sweden concerning the start of an environmental impact assessment procedure (EIA) of a planned offshore wind farm, Fyrskeppet, northeast from Gävle in Sweden's exclusive economic zone (EEZ). The developer of the project is Fyrskeppet Offshore AB. The notification was made in accordance with Article 3 of the Espoo Convention. Included in the notification was a consultation document in Finnish and in Swedish.

The Ministry of the Environment gave the opportunity for the public and the authorities to comment on the material from 28 February to 25 May 2022. The material was displayed on the Ministry's website.

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. Participation is supported by the Ministry of Transport and Communications, Traficom (Transport- och kommunikationsverket; joint statement with Finnish Transport Infrastructure Agency (Trafikledsverket)), Centre for Economic Development, Transport and the Environment in Southwest Finland, the Finnish Environment Institute, the Finnish Wildlife Agency, Natur och Miljö rf., Suomen Ammattikalastajat ry (Finlands Yrkesfiskarförbund r.f.) and WWF Finland. The Finnish Association for Nature Conservation does not see it as important to participate in the EIA of this project as it does in other offshore wind farm projects. BirdLife Finland does not consider it necessary to participate into the EIA as the wind farm is located quite far and the anticipated non significant impacts on birds. The Finnish Heritage Agency and the Finnish Meteorological Institute do not see the need to participate in the EIA from their field of expertise. The Natural Resources Institute Finland and Metsähallitus (Forststyrelsen) replied that they had no comments.

The given statements are enclosed to this letter and should be considered in their entirety. Summary of the statements is given below.



Impact on fish and fishing

Suomen Ammattikalastajat ry (Finlands Yrkesfiskarförbund r.f.) points out that the Fyrskeppet wind farm is planned into the Gulf of Bothnia, which is considered the most important area for Finnish fishing. The impacts of the installation on the natural conditions, fish stocks and fishing in the Gulf of Bothnia must be thoroughly assessed and the obtained information critically examined.

Professional fishers and the Association of Finnish Fishers are very concerned about this development, as the cumulative impacts of different projects on nature and fish stocks have not been studied sufficiently. In practice, large marine areas will become closed to fishing. The association has also published a more general statement on offshore wind power planning and the link is provided in their statement.

WWF Finland points out that the project would cover a relatively large area (534 km²) in the central habitat of the Baltic herring stock in the Gulf of Bothnia, which is also a key fishing area in the trawling. Finland's quota share exceeds 80 per cent. Baltic herring is a key species in the Baltic Sea ecosystem. The Baltic herring and its fishing in the Gulf of Bothnia are also the few examples of EU waters where we can say that the fish stock and its fishing are on a genuinely sustainable basis based on research data.

WWF considers that Finland's goal should be to ensure a good status of the Baltic herring population in the Gulf of Bothnia. It is difficult to estimate the possible long-term impacts of offshore wind turbines on the herring stock in the Gulf of Bothnia, but it can already be assumed at this stage that the on the movements of both Baltic herring and salmon will also steer fishing away from the project area.

Special attention must be paid to the impact assessment on fish. The planning must also ensure that the offshore wind farm does not weaken the operating conditions of the fishing industry in the central fishing area of the Gulf of Bothnia.

Centre for Economic Development, Transport and the Environment in Southwest Finland considers that the most significant environmental impacts of the project on Finland are related to fish and the fishing industry. The area is a very important trawling area for Finnish fishing vessels and should be taken into account in the process.

In addition, the need for comprehensive planning in the Baltic Sea should be taken into account when considering the living conditions of birds and fish stocks as well as the fishing industry.



Impact on maritime safety

The Ministry of Transport and Communications. The project must consider the unimpeded use of waterways, radar systems and safety in maritime transport. It is also essential that the windfarm does not interrupt the use of radio frequencies.

Traficom and the Finnish Transport Infrastructure Agency note in their joint statement that vessels use routes outside the confirmed routes and Traffic Separation Schemes and this needs to be taken into account in the planning to avoid impact into maritime operating conditions and safety.

The cumulative impacts of offshore wind power projects on navigation should be considered. When the amount of wind farms increase over time, they may impact the navigation, especially during winter, in the Gulf of Bothnia. The effect can be extremely high in the Bothnian Bay. The competent authorities in charge of the winter navigation and icebreaking should be consulted in all offshore windfarm projects in the EEZ. In Finland this authority is the Finnish Transport Infrastructure Agency (Trafikledsverket).

Impact on migratory birds

The Finnish Wildlife Agency is concerned about the potential impacts of the project on migratory water fowl. The greatest risks may arise if wind farms are built in shallow marine areas which are important foraging areas for seabirds. The problem is particularly acute in winter when the Baltic Sea's wintering habitats are scarce and birds are concentrated in certain key areas. In order to minimize disturbance to sea birds, wind turbines should be set up in areas that are more than 35 meters deep. This way, the shallow areas used by seabirds for foraging would remain intact and suitable habitat for avian fauna.

The planned wind farm is on the migration route for sea and forest geese nesting in North Ostrobothnia in Finland. The route of monitored GPS-controlled birds and the flight altitude of birds in relation to the planned installation in different weather conditions must be examined in more detail in order to assess the impacts to geese populations. The flight height of geese on the migratory route may vary depending on weather conditions.

From the very beginning, mitigation measures need to be considered to reduce potential collision mortality at critical times (use of technology, coloring etc.). It should also be investigated whether location of turbines could be consecutive in relation to the flight direction of the migration routes. This could reduce the risk of collision especially in weather conditions, where the visibility is poor and the birds fly low.



The planning must take into account the AEWA (African Eurasian Migratory Waterbird Agreement) International Single Species Action Plans for migratory waterbirds, especially for the Velvet Scoter (*Melanitta fusca*), Taiga Bean Goose (*Anser fabalis fabalis*) and Long-tailed Duck (*Clangula hyemalis*). The Agency makes also reference to two guidelines adopted under the African Eurasian Migratory Waterbird Agreement which are pertinent in this regard (*Guidelines on how to avoid, minimize or mitigate impact of infrastructural developments and related disturbance affecting waterbirds* and *Guidelines on How to Avoid or Mitigate Impact of Electricity Power Grids on Migratory Birds in the African-Eurasian Region*). Links to the Action plans and AEWA guidelines are provided in the statement of The Finnish Wildlife Agency.

The Finnish Environment Institute considers that even though the project may not cause direct environmental impacts to marine environment in Finland, still the impacts on sea birds and sea currents need to be studied carefully due to the size of the wind farm.

BirdLife Finland has not knowledge that the planning area would be of particular importance for birds. However, the birds of the open sea are poorly known and the data concerning the foraging areas for fish eating razorbills and black-throated divers is practically nonexistent. These species are known to be sensitive to the disturbance of wind turbines on the open sea and therefore the significance of the area e.g. for foraging of these species must be examined.

It is important that the project includes radar monitoring covering both spring and autumn migration periods to determine the magnitude and height of migration in the area and to assess the risk of collision. It is particularly important to assess the possible impacts of the project on the whole migration route taking into account also other projects along the migratory pathways.

Natur och Miljö rf. considers it particularly urgent to minimize the risk of injuries to migrating bird species. Construction methods and techniques must minimize high noise levels and reduce the spread of bottom sediments during construction as high levels of sediment in the water can negatively affect the reproduction of several fish species. Investigating the impact of electromagnetic fields on fish and eel stocks in the areas affected by wind turbines is also important. The Association may be able to contribute to the environmental assessments.

Transboundary impacts to Finland need to be highlighted

The EIA documentation has to address properly the transboundary impacts and in this respect a separate chapter is proposed looking at the environmental impacts specifically from Finland's point of view.

Assessing the cumulative impacts on the Baltic Sea as a whole is also 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 cumulative impacts of various nature in each wind farm planning process.

Many factors influence the state of the Baltic Sea and, consequently, the status of e.g. seabirds and fish and their habitats. In addition to wind power plants, other threats also affect the status of many species, including harmful substances. 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. 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, 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.

Permanent secretary

Juhani Damski

Senior Ministerial Adviser

Seija Rantakallio

Enclosure

Statements from Finland