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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 Erik Segersäll OWF (Your number NV-05873-22)

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 “Erik Segersäll” in Sweden's 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, “Erik Segersäll”, in the Baltic Sea in Sweden's exclusive economic zone (EEZ). The developer of the project is Deep Wind Offshore. 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 13 June to 22 August 2022. The material was displayed on the Ministry's website. Answers were received from the following: Government of Åland, Ministry of Transport and Communications, Ministry of Defence, Traficom (Transport- och kommunikationsverket), Finnish Transport Infrastructure Agency (Trafikledsverket), Finnish Wildlife Agency, Finnish Meteorological Institute, Metsähallitus (Forststyrelsen), Natural Resources Institute Finland, BirdLife Finland and Finnish Association for Nature Conservation. The given statements are enclosed to this letter and need 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 of the project. The EIA documentation should address properly the transboundary impacts and in this respect a separate chapter is proposed looking at the environmental impacts from Finland's point of view.

The current material did not include anything on transboundary impacts. According to Article 3, already the notification should include any available information on project's possible transboundary impact. Finland wishes to note again that the EIA material from Sweden seems systematically lack information on transboundary impacts. It must be highlighted that the application of the Espoo Convention does not mean that the material is produced only from the national perspective and then translated. In the Espoo process, the current state of the environment and environmental impacts should be described and assessed from



the affected party's perspective. 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).

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. In this project, especially impacts on maritime safety¹ and migratory birds² are important from Finland's point of view.

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 planned project is situated in an area that is important for these Harbor Porpoises and the wind farm may affect seriously the health (hearing) and the movement patterns of the species within this area as well as the links with other areas, like the Finnish sea area close to Åland. In this respect underwater noise must especially be evaluated and actions on mitigating the impacts of the project related to underwater noise must be included into the assessment. Thereby planning (e.g. seismic surveys), building and operating phases need to be considered. 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 Noise-generating 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 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,

¹ The competent authority in charge of the winter navigation and icebreaking, the Finnish Transport Infrastructure Agency (Trafikledsverket) must be consulted. About maritime safety: Ministry of Transport and Communications, Traficom (Transport- och kommunikationsverket) and Finnish Transport Infrastructure Agency. The need to do ice load study (isbelastningsundersökning), see the Government of Åland.

² Due to the lack of knowledge on migratory birds monitoring needs to be carried out. Minimum monitoring would be, for example, visual monitoring in the area over a period of two years at different times of the year. Reference Finnish Wildlife Agency, BirdLife Finland and Finnish Association for Nature Conservation. These statements contain also more broadly the issues about impact assessment on birds.



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.

Permanent secretary

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Enclosure

Statements from Finland