



9.9.2022

Swedish Environmental Protection Agency

registrator@naturvardsverket.se

cc: Richard Kristoffersson (SEPA), Emma Sjöberg (Ministry of the Environment in Sweden)

Notification by Sweden on Olof Skötkonung OWF (NV-06333-22)

## **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 “Olof Skötkonung” 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, “Olof Skötkonung”, 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 18 July to 29 August 2022. The material was displayed on the Ministry's website. Answers were received from the following parties: Government of Åland, Ministry of Transport and Communications, Ministry of Agriculture and Forestry, Ministry of Economic Affairs and Employment, Finnish Heritage Agency, Centre for Economic Development, Transport and the Environment in Southwest Finland, Ålands Environment and Health Protection Agency, Ministry of Defense, 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 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 Baltic



Sea and particularly in the Gulf of Bothnia should be considered in the EIA documentation. The cumulative impacts should be properly assessed to best mitigate harmful impacts in the wider area and ecosystem of the Baltic Sea. 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 offshore wind farm could independently and cumulatively with other proposed wind farms have impacts on the navigation of maritime transport to the ports of the Baltic Sea particularly during wintertime. This issue can have an impact on the environment in case of maritime accidents. In assessing the impacts on maritime transport and safety, the EIA documentation should also take into account the shipping routes outside the confirmed routes and the route allocation systems. The Ministry proposes that the competent authority in charge of the winter navigation and icebreaking as well as the competent authority in charge of maritime safety in Finland are consulted for the EIA documentation and for the projects future execution to ensure maritime safety and prevent maritime accidents with potentially harmful impacts on the environment.<sup>1</sup>

The independent and cumulative impacts of the proposed wind farm should also be 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. The EIA documentation should address the project area's importance to bird foraging with a comprehensive aerial survey during the open water season. 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 project in addition with other similar projects in the area could also affect marine fauna due to underwater noise. Particularly fish populations in the area of the operating wind farm could be affected. This could also impact commercial fishing in the immediate and wider reaching area of the Bothnian Sea, which is an important area for the Finnish fishing industry. The project's possible impacts on fish and commercial fishing have not been properly examined yet in the consultation document, which only included an undetailed examination on the subject. The impacts on fish populations and commercial fishing should be adequately assessed in the EIA documentation and in cooperation with both Finnish and Swedish fishing industry operators.

With regard to the contents of the consultation document, the Ministry would like to note that the consultation document did not include any mention of

---

<sup>1</sup> The competent authority in charge of the winter navigation and icebreaking: the Finnish Transport Infrastructure Agency (Trafikledsverket). The competent authority in charge of maritime safety: Ministry of Transport and Communications, Traficom (Transport- och kommunikationsverket) and Finnish Transport Infrastructure Agency.



transboundary impacts with the exception of the landscape visualization done from Åland. The application of the Espoo Convention necessitates that the current state of the environment and environmental impacts of the proposed project are described and assessed from the affected party's perspective.

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, maritime safety, fish populations, marine fauna and commercial fishing from Finland's perspective.

Permanent secretary

Juhani Damski

Specialist

Anniina Kaikkonen

Enclosure

Statements from Finland