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Additional answer to the notification in accordance with Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) for the wind farm "Baltica 1" in the Polish Economic Zone (EEZ)

Finland sent an answer to the notification on 2 May, 2013 acknowledging receipt of the notification and indicating that it will participate in the environmental impact assessment (EIA) of wind farm Baltica-1 project within the Polish EEZ. Finland also indicated that an additional letter was to be sent to provide comments concerning the scope for the assessment of the environmental impacts of the project based on the Project Description Document provided in Swedish.

The material was put out for public comments. Comments were received from the following quarters. Ministry of Agriculture and Forestry and Ministry for Foreign Affairs had no comments within their field of operation. No comments from the public were received.

Aland government. The EIA must contain sufficiently comprehensive and qualitatively acceptable baseline data to demonstrate project's impact to migrating and wintering species in the Baltic Sea.

Uusimaa Centre for Economic Development, Transport and the Environment. The open sea shoals in the Baltic Sea are extremely important areas for waterfowl. Southern Middle Bank is important overwintering area for long-tailed duck, which is internationally considered to be endangered. Also other birds use the area for feeding and within migration. The impact study on birds must be diverse and comprehensive. It must be based on up-to-date material. Cumulative impacts with other planned wind farms must be taken into account.

Southeast Finland Centre for Economic Development, Transport and the Environment. From the international point of view the central question is the avifauna and project's impacts to it, appropriate impact assessment and providing the mitigation measures. Distribution of bats and marine mammals must be included in the assessment. Cumulative impacts of all wind farms in the area must be taken into account. Monitoring of birds, bats, fish, sea bottom biota and marine mammals must be of special importance. The migrating birds are essential.

Finnish Association for Nature Conservation. Important impacts on Finland are due to the migrating birds and bats. The use of shoal environment and impact on underwater noise to fish and marine mammals must be assessed as Finland's grey seals do visit the area. There is also wish to gain harbor porpoise back to the Finnish nature. Some bird species overwinter in the area and the area must be evaluated in this respect. Cumulative impacts of the two other wind farm projects, in Poland and in Sweden, must be taken into consideration.

Documents were quite general and it was not made clear who makes the assessments, what will be assessed and where. Bats must be surveyed properly in field condition (bat detectors on floating rafts). No alternatives were presented. Possible reserve power and changes in the whole power grid must be taken into account in the EIA.

Finnish Environment Institute. In terms of the environmental protection, it is vital that the project does not alter the water conditions in the Baltic Sea and does not result in significant, long-term adverse impacts on bird life or other marine organisms. The starting point must be a solution that does not alter the natural water flow conditions or have any significant impacts on the structure and functioning of the marine ecosystem.

South Middle Bank is one of the most significant staging areas for long-tailed duck during migration and overwintering. Hundreds of thousands of long-tailed ducks nesting in North Russia and Scandinavia use the area. In one aerial count 220 000 long-tailed ducks were calculated. The most recent estimate is that 6 % of the Baltic Sea population overwinters here.

Approximately 1,500-2,000 pairs of long-tailed duck nest in Finland. The migration route and overwintering areas of this population are unknown, but it is assumed that the birds migrate to the southern Baltic Sea via the Gulf of Bothnia. If Finland's birds migrate along the route, the Southern Middle Bank wind farm may have significant impacts on Finland's small population of long-tailed duck. The threatened species evaluation of 2010 placed Finland's nesting population of long-tailed duck in the 'least Concern' (LC) category but, due to its dramatic reduction, the population migrating through Finland was classified as 'Vulnerable' (VU).

Between 1992-1993 and 2007-2009, the wintering long-tailed duck population of the Baltic Sea has fallen from 4.3 million individuals to 1.9 million, that is, by more than 50 per cent. The same period has seen a 46 per cent population decrease in the long-tailed duck in the key overwintering areas of the central Baltic Sea, Hoburgs Bank (south side of Gotland) and Middle Bank. This is partly a consequence of poor nestling survival in the Siberian nesting areas. Because of the lower nestling survival rate, the death rate from oil spills and hunting is focused on the adult population, resulting in a continuous fall in long-tailed duck populations.

Unauthorised oil spills are one reason for the decreasing numbers of long-tailed duck. According to Swedish studies, such spills kill tens of thousands of long-tailed duck every year in the Baltic Sea. In the Hoburgs Bank area, 12 per cent of long-tailed ducks caught in fishing equipment (998 individuals) had traces of oil on their plumage. Numerous oil spills have been observed near the Southern Middle Bank, originating from the shipping route that cuts through the area. Hence, the long-tailed duck is already under threat in the Southern Middle Bank area. Wind power may add to these threats.

According to research, the negative impacts of wind farms go down to hundreds of meters or even kilometers from the wind power plant. The impact may extend to 2 kilometers for long-tailed duck, so the cumulative disturbance together with the other two planned wind farms may cover the whole Southern Middle Bank's shoal area.

The area is also frequented by the black-throated diver and the common eider (NT, near threatened). Of the auk family, the black guillemot, razorbill and common guillemot (CR, critically endangered) can be found there, as well. Regarding these bird species, it is unknown whether some birds using the area belong to the population nesting in Finland. Among these species, wind turbines pose a direct threat of collision for divers, because they generally fly at the height of the blades of the wind turbines. In turn, auks usually fly low, close to the surface of the water and therefore are at no risk of colliding with the wind turbines blades. However, the direct disruptive impact of the wind farm and the poor nutritional quality of the seabed due to construction would pose a threat to all waterfowl.

The significance of the Southern Middle Bank to the long-tailed duck and common eider is based on the abundant mussel population of the area. Long-tailed ducks frequent the area from October to April and common eiders during the moult period for males, in June-July.

Noise impact is dependent on the building method as the noise may be continuous or occasional. According to the EU Marine Strategy Framework Directive impulsive noise (detonation, drilling, pile driving etc.) may be restricted so that neighboring countries must agree on, amongst other

things, on the amount and timing of blasting and pile driving. This is why also the noise impact and its significance must be assessed.

The cumulative impacts of all wind farm projects with Southern Middle Bank must be assessed. The Finnish Environment Institute wishes that an international panel will be set up to evaluate the scientific credibility of the assessment and projecting different viewpoints.

The Ministry of the Environment requests Poland to take the above mentioned comments into account in the EIA of the Baltica-1 project. A special emphasis must be given to the cumulative impacts of the various offshore wind farms in the Southern Middle Bank area, both on the Polish and the Swedish side.

Helsinki Commission (HELCOM) is drafting at the moment a recommendation on safeguarding important bird habitats and migration routes in the Baltic Sea from negative effects of wind and wave energy production at sea. A "Background report on the potential conflicts between bird conservation and wind power production in the Baltic Sea" has been produced within HELCOM. Finland hopes that these essential principles and knowledge will already be used and taken into account in this procedure.

Finland would appreciate the EIA documentation material to be provided also in Finnish. If this is not possible, please provide enough time for the translation before the public hearing.

Permanent Secretary



Hannele Pokka

Ministerial Adviser



Seija Rantakallio

