



Ministry of the Environment of Estonia  
Narva mnt 7a  
15172 ESTONIA  
keskkonnaministeerium@envir.ee  
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### **Finland's response to Estonia's letter regarding the environmental impact assessment of the offshore wind farm project in North-West Estonia**

On 15 August 2019, the Ministry of the Environment received a letter from the Ministry of the Environment of Estonia concerning the environmental impact assessment (EIA) of the offshore wind park project in North-West Estonia. In its letter, the Ministry of the Environment of Estonia states that on 13 July 2018, it made a decision not to approve the EIA report for the project because the report was neither appropriate nor sufficient. Enefit Green AS (formerly Neljä Energia AS), the project promoter, has supplemented the report following the decision by the Ministry. The Ministry of the Environment of Estonia has sent an updated summary of the EIA report for possible comments.

The EIA procedure for the North-West Estonian wind farm has been ongoing since 2007 when Finland informed Estonia that it would be participating in the EIA of the project. A summary of the EIA report was sent to Finland in July 2011, and Finland submitted its comments to Estonia in January 2012. In 2017, Finland received a letter and a supplement of the EIA report from the Estonian environmental authorities. According to the letter, the comments Finland had submitted to Estonia in 2012 had been taken into account in the supplement to the EIA report. Finland submitted its comments on the supplemented EIA report in May 2017. Since then, the project promoter has supplemented the EIA report again, following the above-mentioned negative decision by the Estonian Ministry of the Environment in 2018.

In August 2019, the Ministry of the Environment of Finland sent a request for comment on the supplemented EIA report to the authorities that had submitted an opinion on the first supplement to the report in 2017. These authorities were the Ministry of Agriculture and Forestry of Finland, the Ministry of Transport and Communications, Metsähallitus (a state-owned enterprise) and the Centres for Economic Development, Transport and the Environment of Uusimaa, South-east Finland and Southwest Finland. The request for comment was also sent to the Ministry for Foreign Affairs of Finland for information.

In addition, the request for comment of the Ministry of the Environment and a summary of the supplement to the EIA report were published on the Ministry's website. During the public commenting period from 29 August to 30 September 2019, the Centre for Economic Development, Transport and the Environment of Southeast Finland, the Ministry for Foreign Affairs of Finland and the Ministry of Agriculture and Forestry of Finland submitted statements or supplements to their previous statements. No comments from the public were received. The statements received are enclosed in their entirety.

**The Ministry of the Environment** would like to point out that in its previous statements, the Ministry has expressed that the construction of wind energy projects in the Baltic Sea must not cause long-term adverse impacts on birds or other marine organisms or alter the water conditions in the sea. The Ministry has also stated that regarding the possible effects on Finland of the wind farm projects, the impacts on migratory birds and bats and their migration routes should be considered. The Ministry regards these views still as important.

Based on the statements received, and reflecting its own views, the Ministry of the Environment requests Estonia to take all the statements and comments that Finland has submitted in 2011, 2012 and 2017 into due account in the EIA of the offshore wind farm project.

### **Summary of the statements**

**The Centre for Economic Development, Transport and the Environment of Southeast Finland** stated that the most important issue when assessing the environmental impact of the wind farm is birdlife, the impact on birdlife and the proper investigation of this impact. In the implementation phase of the project, it is particularly important to carefully plan and implement measures to prevent or mitigate any adverse effects based on studies that have already been carried out, as well as supplementary studies. In a statement issued in 2017, the Center of Economic Development, Transport and the Environment of Southeast Finland welcomed the fact that no wind turbines would be established on the Apollo shallow. According to the supplement to the EIA report, no wind turbines will be established on the shallow, and mitigation measures will be taken in order to reduce the adverse impacts and risks of collision of birds caused by the wind farm.

The Centre for Economic Development, Transport and the Environment of Southeast Finland stated that it prefers option 2 to option 1 for birds, as option 2 has fewer wind turbines, and a development area TP 1 is located further from the protection area of the Apollo shallow. However, according to the Centre of Economic Development, Transport and the Environment, due to the size of the wind farm, special attention should be paid to monitoring the environmental impacts of the project. Monitoring the impacts on birds, bats and marine mammals is of particular importance.

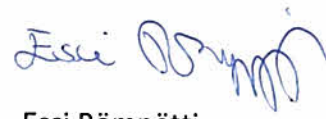
**The Ministry for Foreign Affairs of Finland** stated that it has no comments on the supplement to the EIA report. However, the Ministry for Foreign Affairs pointed out that the EIA procedure is subject to the Convention on Environmental Impact Assessment in a Transboundary Context and stressed the importance of complying with international commitments.

**The Ministry of Agriculture and Forestry** stated that it has nothing to add to its previous statements on the matter.

Director General,  
on behalf of the Permanent Secretary



Leena Ylä-Mononen



Essi Römpötti

Specialist

**Enclosures**

Statements received

**For information (without enclosures)**

The Ministry for Foreign Affairs of Finland

