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Response 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 "Baltic North" in the Polish Economic Zone (EEZ)

Finland has received notification (your case number DOOŚ-tos.440.3.2012.JA) from Poland concerning the environmental impact assessment (EIA) of the wind farm "Baltic North", within the Polish Exclusive Economic Zone of the Baltic Sea. The notification was made in accordance with Article 3 of the Espoo Convention.

Baltex Power SA in Poland is planning an offshore wind farm called "Baltic North" in the Southern Middle Bank area of the Polish Economic Zone. The wind farm will consist of 260 wind turbines of 3-10 MW each. Poland has, in accordance with the ECE Convention on environmental impact assessment in a transboundary context, informed Finland of the project. A Swedish version of an information sheet describing the project and the planned environmental impact assessment has been submitted to Finland for comments.

Finland, as the affected party, hereby declares a wish to participate in the consultation regarding the environmental impact assessment (EIA) of the project.

In terms of 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.

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 that 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.

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 turbine 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. Birds of the auk family move widely on the shoals of the Baltic Sea during their overwintering period, as their primary nutrition consists of fish and other benthic animals. The foundations of the wind turbines and the dispersal of sediment across the seabed would decrease the number of benthic animals suitable as nutrition. A critically endangered species, the common guillemot has a colony of 35–70 pairs nesting in the Gulf of Finland, and another, slightly smaller colony nesting in Åland. Small colonies face a major risk of extinction. Loss during overwintering in shoals, together with the mortality rate of adult birds in the Gulf of Finland, may destroy the resident colony.

Many factors influence the preservation of sea birds and habitats in the Baltic Sea; the aggregate impacts of these factors 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. For Finland, the preservation of sea birds and their habitats, not only in Finland but in the entire Baltic Sea area, is at stake because of the Southern Middle Bank project.

The project must pay special attention to measures alleviating its impacts, both when planning the location of wind turbines and during the construction phase of the project, and when determining solutions during the operation of the wind farm, as regards individual turbines, underwater cables and other constructions.

On behalf of the Permanent Secretary,
Director General



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For information

Ministry for Foreign Affairs of Finland

Ministry of Agriculture and Forestry

Ministry of Transport and Communications

Åland Government

Finnish Environment Institute

Centre for Economic Development, Transport and the Environment for Southwest Finland

Centre for Economic Development, Transport and the Environment for Uusimaa

Centre for Economic Development, Transport and the Environment for Southeast Finland

Metsähallitus

Finnish Association for Commercial Fishermen (Suomen Ammattikalastajaliitto SAKL ry)

Finnish Association for Nature Conservation

WWF Finland