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## Response to the EIA report for Saare-Liivi offshore wind farm in the Gulf of Riga, Estonia

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The Gulf of Riga is a significantly important area for birds, which means exceptional caution needs to be applied when siting a wind farm. Adapting the location in accordance with known occurrences of birds is very much necessary. It needs to be pointed out that a major "migration corridor" passes the proposed wind farm area. This means that Saare-Liivi offshore wind farm can still have a significantly negative impact on birds migrating through/over the Gulf of Riga.

Of high importance to acknowledge, is the fact that a large part of the remaining original wind farm area covers waters that are known to be significantly important for staging, moulting, and wintering seabirds, e.g. significant numbers of long-tailed ducks and velvet scoters, as pointed out in the EIA report. The adaption of the wind farm location has reduced the impacts, but major impacts may still be present.

If the Saare-Liivi offshore wind farm is pursued, the mitigation measures presented in table 4.1-1 must be implemented. BirdLife Sweden wishes to emphasize the following.

- In order to minimize mass collision events, the illumination lights of the wind farm must be adapted in the best possible way to avoid attraction of birds.
- Implementation of instantaneous shut-down curtailment of wind turbines is, under specific conditions, absolutely necessary! This technique is already in use in The Netherlands<sup>1-2</sup>, and must be implemented further within the offshore wind industry, e.g. at Saare-Liivi. In a Polish project, a potential loss of approximately two million birds per year was modelled. This is an unacceptable toll on birds populations, which might even be critical for some species (in addition to other relevant threats). Curtailment events mainly occur at low wind speeds, when economic consequences are negligible<sup>11</sup>. In a German risk analysis, 36% of all bird collisions happened in October. By stopping/slowng the turbines a total of 30 hours when migration intensity exceeded a prescribed threshold, 27% of collisions could be avoided<sup>3</sup>
- For birds passing in daylight, the possibility of triggering a stronger avoidance effect (e.g. by painting one or more of the rotor blades<sup>4,5</sup>) should be investigated and implemented.
- Long-term monitoring of wintering/staging seabirds, as well as the general bird migration, needs to be performed. This is necessary to inform the progress and effectiveness of implemented mitigation measures.

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<sup>1</sup> Machado R *et al.* 2024. Bird Curtailment in Offshore Wind Farms: Application of curtailment in offshore wind farms at a sea basin level to mitigate collision risk for birds. Birdlife Europe and Central Asia and STRIX, Brussels, Belgium. DOI: 10.5281/zenodo.11237120

<sup>2</sup> <https://www.youtube.com/watch?v=mkScszf8NC4>

<sup>3</sup> Welcker J & Vilela R. 2019. *Weather-dependence of nocturnal bird migration and cumulative collision risk at offshore wind farms in the German North and Baltic Seas*. Technical report. BioConsult SH, Husum. 70 pp.

<sup>4</sup> Stokke BG *et al.* 2020. *Effect of tower base painting on willow ptarmigan collision rates with wind turbines*. Ecology and Evolution 10(12): 5670–5679; <https://doi.org/10.1002/ece3.6307>

<sup>5</sup> May R *et al.* 2020. *Paint it black: Efficacy of increased wind turbine rotor blade visibility to reduce avian fatalities*. Ecology and Evolution 10(16): 8927–8935; <https://doi.org/10.1002/ece3.6592>

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For more detailed analyses and suggestions, we refer to the expert opinions of the national partner of BirdLife International – The Estonian Ornithological Society.



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