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Swedish reply to the additional consultation pursuant to article 5 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention), regarding the planned offshore wind farm Saare-Liivi, (ref: 17.03.2025 16-3/25/1197-3)

On the 15th of March 2025, the Ministry of Climate in the Republic of Estonia informed the Swedish Environmental Protection Agency (SEPA) that the project had reached the EIA report stage and invited Sweden to comment on the documentation regarding Utilitas Wind OÜ Saare-Liivi offshore wind farm (OWF) project, in the Gulf of Riga.

The developer, Utilitas Wind OU, plans to establish an OWF consisting of 299 turbines with maximum capacity of 14 – 20 MW.

The Swedish Environmental Protection Agency is the responsible authority for submitting and receiving notifications and otherwise fulfilling obligations for environmental impact assessments in a transboundary context [Espoo Convention] in Sweden, according to the Environmental Assessment Regulation (2017:966). The consultation was directed to the organizations which had previously submitted their comments and lasted from the 20th of March to the 14th of May 2025.

Remarks received during the consultation

A brief summary of the statements received is included below, please note that the summary is written on behalf of the Swedish EPA and not for the body to which the proposal is referred for consideration. All statements are enclosed in full to this letter.

Bird Life Sweden points 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. In their statement they also list mitigation measures that is needed.

Please see full statement attached.

The **Swedish Pelagic Federation PO [SPF]** considers that the planned offshore wind farm Saare-Liivi could possibly cause transboundary impacts if the construction or operation of the park cause any negative impacts on fish stocks caught by their member’s vessels. The summary of the EIA report states that the wind farm will not have any negative impacts on fish. At the same time, it is mentioned in section 3.4 of the report that “... the exact indirect impacts on the fish population and, consequently, on the entire marine ecosystem remain unclear”. If this is the case, it is contradictory to simultaneously state with certainty that the future park will not have any transboundary effects. In their statement they include risk minimizations measures that they see necessary.

Please see full statement attached.

The **Swedish Transport Administration** states that they do not have any further comments.

As the decision has been made electronically there is no need for signatures.

For the Swedish Environmental Protection Agency

Nanna Wikholm
Head of Unit

Richard Kristoffersson
Point of contact for the Espoo
Convention

Attachments

Comments from the Swedish Transport Administration

Comments from BirdLife Sverige

Comments from The Swedish Pelagic Federation

Cc

The Ministry of Climate and Enterprise, Eleonora Rönström and Sandra Jalalian