



LIETUVOS RESPUBLIKOS APLINKOS MINISTERIJA
THE MINISTRY OF ENVIRONMENT OF THE REPUBLIC OF LITHUANIA

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Ministry of Climate of the Republic of Estonia
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2025-05-
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No. D8(E)-
No. 16-3/25/1197-3

**REGARDING THE ENVIRONMENTAL IMPACT ASSESSMENT OF THE INITIAL
AREA OF THE OFFSHORE WIND FARM PROJECT “SAARE-LIIVI”**

The Ministry of Environment of the Republic of Lithuania would like to thank the Ministry of Climate of the Republic of Estonia for submission of environmental impact assessment (EIA) report of the offshore wind farms project „Saare-Liivi“ (hereinafter also referred to as the Project).

The Ministry of Environment, as an authority responsible for coordination of the transboundary EIA process in accordance with the UNECE Convention on Environmental Impact Assessment in a transboundary Context (Espoo Convention) published the received documentation on its website and distributed it to the relevant national authorities, providing an opportunity to submit comments and proposals.

The Ministry of Environment did not receive any comments or proposals from the public. However, we did receive some essential proposals and suggestions from the State Protected Area Service.

We agree with the conclusion of the EIA report stating that the second main alternative may have a significant impact on the populations of the black-tailed godwit (*Melanitta fusca*) and the snow duck (*Clangula hyemalis*), i.e. birds whose aggregations during migration and wintering are protected in special national and “Natura 2000” areas Lithuania. Therefore, this alternative is not acceptable in the context of protection of birds in Lithuania.

Regarding the third alternative (alternative site with a reduced northeast angle as shown in Figure 4.1-1 of the EIA report), it could be considered as acceptable if all the environmental impact mitigation measures outlined in the environmental impact assessment report are implemented. However, considering the sensitivity of the protected species, the EIA report lacks a clear plan for selecting and implementing measures to avoid significant impacts on biodiversity or compensatory measures in case they cannot be avoided, if a significant impact occurs. The EIA report should outline a plan for actions if monitoring reveals that the impact is significant and the measures proposed in the EIA report to mitigate the effects are insufficient. We recommend preparing a plan that indicates the threshold values for significant impact on species, as well as the timeline and mechanism for decision-making and implementation, in case a significant impact occurs. This would correspond to the European Commission's guide “Managing Natura 2000 sites. The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC”: „for the competent authority to be able to decide if the mitigation measures are sufficient to remove any potential adverse effects of the plan or project on the site (and do not inadvertently cause other adverse effects on the species and habitat types in question), each mitigation measure must be described in detail, with an explana-

tion based on scientific evidence of how it will eliminate or reduce the adverse impacts which have been identified. Information should also be provided of how, when and by whom they will be implemented, and what arrangements will be put in place to monitor their effectiveness and take corrective measures if necessary. “

We would like to draw attention that the EIA report includes provisions for a long-term monitoring period for certain bird species, but not for those species, which are sensitive to the impacts of wind farms. This fact may compromise the results of long-term monitoring and impact control; therefore we suggest revising the monitoring periods for birds.

Finally, we would like to point out that the cumulative impacts on bird species, considering other wind farm parks planned in the Baltic Sea, are not sufficiently assessed.

Although Chapter 5 of the EIA report “Cumulative Impacts” indicates the main sources of cumulative impacts and potential effects, such as displacement of birds from their usual habitats and increased risk of birds colliding with the turbines, it would be useful to foresee measures of managing cumulative impacts and risks.

We kindly request to consider the above-mentioned comments and suggestions, and to inform us how they were taken into account. We also kindly ask you to send us information mentioned in Article 6 of the Espoo Convention when the final decision is made and according to Article 7 inform us about the results of post project analysis of the Project.

Yours sincerely,

Vice-minister
Tomas Vaitkevičius

DETALŪS METADUOMENYS

Dokumento sudarytojas (-ai)	Lietuvos Respublikos aplinkos ministerija 188602370, A. Jakšto g. 4, LT-01105 Vilnius
Dokumento pavadinimas (antraštė)	REGARDING THE ENVIRONMENTAL IMPACT ASSESSMENT OF THE INITIAL AREA OF THE OFFSHORE WIND FARM PROJECT "SAARE-LIIVI"
Dokumento registracijos data ir numeris	2025-05-21 Nr. D8(E)-2068
Dokumento gavimo data ir dokumento gavimo registracijos numeris	–
Dokumento specifikacijos identifikavimo žymuo	ADOC-V1.0
Parašo paskirtis	Pasirašymas
Parašą sukūrusio asmens vardas, pavardė ir pareigos	Tomas Vaitkevičius, Viceministras
Sertifikatas išduotas	TOMAS VAITKEVIČIUS LT
Parašo sukūrimo data ir laikas	2025-05-20 22:55:27 (GMT+03:00)
Parašo formatas	XAdES-T
Laiko žymoje nurodytas laikas	2025-05-20 22:55:49 (GMT+03:00)
Informacija apie sertifikavimo paslaugų teikėją	SK ID Solutions EID-Q 2021E, SK ID Solutions AS EE
Sertifikato galiojimo laikas	2025-03-19 18:45:56 – 2030-03-19 23:59:59
Informacija apie būdus, naudotus metaduomenų vientisumui užtikrinti	"Registravimas" paskirties metaduomenų vientisumas užtikrintas naudojant "RCSC IssuingCA-2, VI Registru Centras - i.k. 124110246 LT" išduotą sertifikatą "DBSIS, Informatikos ir ryšių departamentas prie Lietuvos Respublikos vidaus reikalų ministerijos, į.k.188774822 LT", sertifikatas galioja nuo 2025-05-16 11:31:08 iki 2028-05-15 11:31:08
Pagrindinio dokumento priedų skaičius	–
Pagrindinio dokumento priedamų dokumentų skaičius	–
Priedamo dokumento sudarytojas (-ai)	–
Priedamo dokumento pavadinimas (antraštė)	–
Priedamo dokumento registracijos data ir numeris	–
Programinės įrangos, kuria naudojantis sudarytas elektroninis dokumentas, pavadinimas	DBSIS, versija 3.5.80.6
Informacija apie elektroninio dokumento ir elektroninio (-ių) parašo (-ų) tikrinimą (tikrinimo data)	Atitinka specifikacijos keliamus reikalavimus. Visi dokumente esantys elektroniniai parašai galioja (2025-05-21 08:01:32)
Paieškos nuoroda	–
Papildomi metaduomenys	Nuorašą suformavo 2025-05-21 08:01:32 DBSIS