

Authority Services

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Ministry of Climate
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Finland's response to the consultation regarding the environmental impact assessment report of the offshore windfarm Saare-Liivi in Estonia

The Finnish Environment Institute acknowledges that Finland has received the consultation letter regarding the environmental impact assessment (EIA) report dated 17 March 2025 concerning the offshore windfarm Saare-Liivi's initial project area. The letter is based on the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention). In addition, the Agreement between the Government of the Republic of Estonia and the Government of the Republic of Finland on Environmental Impact Assessment in a Transboundary Context is applied.

Notification

Estonia notified Finland of the EIA programme for the offshore windfarm Saare-Liivi on 8 September 2022. As a response to the notification, the Ministry of Environment replied on 8 November 2022 that Finland intends to participate in the EIA procedure of the planned project.

Changes in the project area

On 25 April 2023, the Finnish Environment Institute received updated information regarding the environmental impact assessment of Utilitas Wind OÜ Saare-Liivi offshore wind farm project in the Gulf of Riga from the Estonian Ministry of Climate. In the letter of updated information, it was stated that according to the 9 March 2023 decision No. 1-7/23-063, the significant environmental impacts regarding the additional area of Saare-Liivi offshore wind farm will be assessed in the ongoing EIA procedure already initiated by 23 December 2021 decision No. 1-7/21-521. As part of the project's ongoing EIA procedure the developer must prepare a new (i.e. supplementary) EIA programme and if necessary, a new EIA report in terms of the additional area. In addition, the developer has to decide whether to prepare two separate EIA reports or one EIA report that covers the entire area (i.e. initial and additional area). As soon as the preparation of the new EIA programme is completed, the outcome will be sent to the concerned countries for commenting.

Notification for the additional project area

In July 2023, the Finnish Environment Institute received a notification from the Estonian Ministry of Climate (Kliimaministerium) of the EIA procedure for the additional area of the project. The Finnish Environment Institute submitted Finland's response to Estonia on 12 September 2023.



The planned project

Utilitas Wind OÜ is planning an offshore wind farm in the Gulf of Riga, in the coastal waters of Pärnu County. The option considered most feasible in the EIA report contains maximum of 80 wind turbines with a capacity of 15 or 20 megawatts (MW). The total capacity of the wind farm will be a maximum of either 1,200 MW or 1,600 MW. The EIA report covers a plan for a maximum 31-kilometer-long interconnection cable with an estimated 220 kilovolts (kV) or, alternatively, 330 kV alternating current.

Consultation in Finland

In accordance with Section 30 (911/2022), Subsection 1 of the Finnish Act on Environmental Impact Assessment (252/2017), the Finnish Environment Institute is the competent authority and responsible for tasks under the Espoo Convention. The Estonian Ministry of Climate of (Kliimaministeerium) requested to provide comments concerning the assessment of the environmental impacts of the project affecting Finland and to submit the comments from the public and authorities regarding the EIA report.

The public and the authorities were given the opportunity to comment on the consultation documents from 20 March to 9 May 2025, which were available on the website of Finland's environmental administration (ymparisto.fi) and on a platform by Ministry of Justice in Finland for requesting and submitting statements electronically (lausuntopalvelu.fi). Statements were also requested from relevant stakeholders.

Remarks received during the consultation

The Finnish Environment Institute has prepared an English summary of the seven statements received in Finland. The original statements in Finnish, which are enclosed to this letter, include important and detailed remarks which need to be examined and taken into consideration in their entirety.

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

Based on the results of the impact assessment, the impact on birdlife is likely to be significant unless appropriate mitigation measures are implemented. Mitigation measures are also necessary to minimize transboundary impacts, as a large proportion of the birds resting in the area are migratory birds. If all necessary mitigation measures are implemented, the project is not likely to have a significant impact on birds migrating to Finland. The Centre for Economic Development, Transport and the Environment of Southwest Finland (ELY Centre of Southwest Finland) therefore supports the implementation of the proposed mitigation measures for birds, bats, and seals and considers the smallest project option, main option 3, to have the least negative impact on nature. Regarding seals, the ELY Centre notes that the mitigation of impulse noise caused by the construction of wind turbines is a mitigation measure for the construction phase but is listed in the table as a measure for the operational phase. The mitigation needs to be specifically implemented when the wind turbines are installed.

Monitoring of nature values during the construction and operation phases is a good practice, and the ELY Centre of Southwest Finland considers its inclusion in the project plan to be very positive. Monitoring can also improve our understanding of the cumulative impacts of other windfarm projects in the Baltic Sea area, for example, on birds migrating along the Baltic Sea coast.

Through implementing mitigation measures, transboundary impacts on the natural environment have been adequately excluded in the assessment.



Centre for Economic Development, Transport and the Environment of Southwest of Finland - Fisheries Authority

The Pärnu River, which flows into the northeastern part of the Pärnu Bay, is one of Estonia's most significant migratory fish waterways. Based on the material provided with the request for a statement, the environmental impact assessment phases of the project have not evaluated the impact of the construction and operation of the offshore wind farm on the behaviour and life cycle of salmon and other migratory fish. If the project is expected to have an adverse impact on migratory fish, this could have transboundary effects. Therefore, the Fisheries Authority recommends that an assessment of the project's impact on migratory fish stocks be prepared as the project progresses.

There is no Finnish Baltic herring fishing in the Gulf of Riga area. The Baltic herring (*Clupea harengus membras*) in the Gulf of Riga constitutes a separate population from the Baltic herring stock in the main basin of the Baltic Sea, which also does not migrate to the main basin to any significant extent (ICES 2024). Therefore, the construction of the offshore wind farm is not expected to have direct adverse effects on other herring stocks in the Baltic Sea or on Finnish herring fishing in the main basin, the Gulf of Bothnia, and the Gulf of Finland.

Indirect effects on Finnish herring fishing could occur if the herring stocks in the Gulf of Riga decline or if the project reduces fishing opportunities in the Gulf of Riga, resulting in increased commercial herring fishing by Estonia and Latvia in the main basin of the Baltic Sea. However, according to the studies carried out in the EIA, the project area under consideration is neither a major herring spawning area nor a significant herring fishing area. As the assessment has progressed, the original planning area was reduced and limited in such a way that the potential adverse effects of the project on fisheries have decreased. The turbines are planned to be placed in marine areas with depths of 25–40 meters. Herring spawning typically occurs in shallower areas.

In addition to the measures mentioned above, mitigation measures related to the timing of construction work and the method of turbine foundation have been proposed to ensure the protection of herring spawning and migration. The Fisheries Authority recommends that the proposed mitigation measures be followed when the project is implemented.

The Fisheries Authority supports the EIA report's proposal to monitor fisheries impacts during construction and operation of the project. The need is emphasized by the fact that the impacts of offshore wind farms on the marine ecosystem are not fully understood. It is also appropriate to consider other offshore wind farms planned in the vicinity and their combined effects on fish stocks and fisheries in the planning and implementation of the monitoring. Existing and future fisheries surveys and studies may highlight important aspects that can be applied in the planning and implementation of other offshore wind farms in the Baltic Sea region.

The Federation of Finnish Fisheries Associations

Several different offshore wind power projects are planned across the Baltic Sea. Individual projects may restrict fishing opportunities in certain areas and have a negative impact on fish stocks in the area. In addition, the combined impact of numerous projects on fish stocks, spawning grounds and migration routes of migratory fish may be significant.

The material submitted for consultation is rather limited. Regarding fish stocks, the focus has been on issues related to herring migration and spawning. This is, of course, an important topic, as herring is a commercially significant species in the region.



However, the material does not address the impacts of construction and wind power use on migratory fish. How will the planned measures in the area affect the migration of salmon, trout and eel, for example? Trout stocks are local, but salmon and eel migration cover the entire Baltic Sea, and the impacts therefore also have cross-border dimensions. For example, eels migrating from Finland are known to migrate along the coast of Estonia. Old catch statistics show that significant eel catches have been made in the Gulf of Riga. In our opinion, the study should be supplemented regarding migratory fish.

Significant expansion of offshore wind power is planned throughout the Baltic Sea. In addition to local impacts, we are concerned about the combined and cumulative effects of wind power projects on fish stocks and fishing opportunities. We believe that more coordination and analysis of the combined effects of offshore wind power projects in the Baltic Sea is needed before permits are granted for individual projects. While individual measures may have a limited impact, the combined effects of several projects may have significant and irreversible adverse effects on fish stocks, fisheries and the marine environment in general.

Finnish Transport and Communications Agency Traficom

Finnish Transport and Communications Agency Traficom (Traficom) has reviewed the assessment documents for the project and considers it positive that, as planning progresses, the project will also include an assessment of the navigational risks for vessels operating in the offshore wind farm area, such as those involved in construction, maintenance and rescue operations. In addition, it is important from a point of view of maritime safety to carry out control measurements on the operation of the radio systems and to identify any additions that may be required after the construction of the offshore windfarm. Traficom also notes that it would be beneficial to investigate the impact on radio systems in exceptional situations where vessels have drifted close to or into the offshore windfarm area.

Finnish Meteorological Institute

The Finnish Meteorological Institute has reviewed the proposal and issued the following statement: Regarding marine research, the Finnish Meteorological Institute has no comments on cross-border impacts, as the hydrodynamic effects are limited to the Gulf of Riga. The Finnish Meteorological Institute considers that the proposed follow-up monitoring is also adequate. Regarding the weather radar network, the Finnish Meteorological Institute has no comments to make, as the area is more than 20 km away from the nearest weather radar.

Regional Council of Southwest Finland and Helsinki-Uusimaa Regional Council replied but did not have any comment on the matter.

Conclusions

The results of the EIA report indicates that the project could significantly affect birdlife, especially migratory birds, unless effective mitigation measures are implemented. The Finnish Environment Institute agrees that the proposed mitigation measures should be implemented to minimise the impact on migratory birds, as well as bats, seals and to protect herring spawning and migration.

The Finnish Environment Institute notes that the EIA report has not adequately addressed potential impacts on migratory fish, such as salmon and eel, which may have transboundary impacts. These impacts should be assessed especially during the construction and operational phases as the project progresses. The Finnish Environment



Institute requires that the EIA report should be supplemented in this regard and the impacts are considered in the permitting process and decision.

Regarding the upcoming EIA report of the additional area, the Finnish Environment Institute notes that the impacts of the initial project area need to be considered in the coming EIA report, covering an overall assessment of the combined environmental impacts of the two project areas. In addition, the cumulative effects of other offshore wind farm projects in the vicinity of the project area should be considered.

Head of Services

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This document has been electronically signed. The electronic signatures can be verified from the register office of the Finnish Environment Institute.

Appendices

Statements received in Finland

For information

Ministry for Foreign Affairs
Ministry of the Environment
Centre for Economic Development, Transport and the Environment of Southwest Finland
Centre for Economic Development, Transport and the Environment of Southwest of Finland - Fisheries Authority
Finnish Meteorological Institute
Finnish Transport and Communications Agency Traficom
Helsinki-Uusimaa Regional Council
Regional Council of Southwest Finland
The Federation of Finnish Fisheries Associations

