



Vides pārraudzības valsts birojs

*Environment State Bureau of the Republic of Latvia*

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**Mr. Kaupo Heinma**

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**Regarding the transboundary environmental impact assessment of the Offshore wind farm project *Saare – Liivi 5* in the Gulf of Riga**

The Environmental State Bureau (hereinafter – the Bureau) would like to thank the Ministry of Environment of the Republic of Estonia for documentation send regarding the public participation process of the transboundary environmental impact assessment programme (hereinafter – the EIA Programme) of the *Offshore wind farm project Saare – Liivi 5 in the Gulf of Riga* (hereinafter – the Project) as well as express gratitude to the Ministry of Environment of the Republic of Estonia and the developers of the Project who organized and participated in the public meeting of the EIA Programme held on the 12th of October 2022 and presented information as well as answered on the questions of the participants of the meeting.

We inform that term for the process of public participation in Latvia was 23rd of September till 24th of October 2022. The Bureau gathered opinions expressed by various stakeholders about the EIA Programme and informs that more detailed comments were provided by the Ministry of Transport of the Republic of Latvia (hereinafter – the Ministry of Transport), the Health Inspectorate of the Republic of Latvia (hereinafter – the Inspectorate), the Nature Conservation Agency of the Republic of Latvia (hereinafter – the Agency) and the Latvian Association of Fishermen.

- The Ministry of Transport concluded that the EIA Programme does not provide assessment regarding impacts on ship traffic in the Gulf of Riga from the Irbe Strait to the Pärnu Port, and between Riga and Pärnu Ports. The Ministry of Transport asks to provide an assessment on ship traffic and to highlight the planned shipping pathways through the territories mentioned in the Project and future development areas of the planned offshore windfarm “*Saare – Liivi 5*” to the port of Pärnu.
- The Inspectorate notes that the previous comments have been taken into account and, in general, there are no other remarks at this stage of the environmental impact assessment. In addition, regarding visualization of this offshore wind park the Inspectorate indicates that if

technically it is possible / is not yet performed, the Inspectorate recommends that the Zone of Theoretical Visibility analysis shall be carried out also from the nearest land points of Latvia.

- The Agency provided the following comments:
  - The information regarding specially protected nature territories in Chapter 4.1.5. and 6 of the EIA Programme need to be supplemented with the NATURA 2000 site marine protected area “*Ainaži – Salacgrīva*”, which is the nearest specially protected nature area to the Project area in the territory of Latvia. Although significant impacts are not likely to be expected as the area is mainly designed to protect habitats (Reef, NATURA 2000 code 1170), it is also an important spawning and feeding site for coastal fish for the Spined Loach *Cobitis taenia* and the European River Lamprey *Lampetra fluviatilis*.
  - There is no information about the Sites of importance for birds (IBAs) in the territory of Estonia or Latvia in the EIA Programme. The most important nearest places of birds to the Project area in the territory of Latvia are “*Piekraste no Salacgrīvas līdz Vitrupei (LV062)*” and “*Randu pļavas (LV080)*”.
  - Figure 4-11 of Chapter 4.1.4 of the EIA Programme shows that bats migrate through the migration corridor during autumn migration from the southern coast of Saaremaa (Sõrve Peninsula) to the south-west and possibly cross the protected marine area “*The Irbe Strait*”. As no sea bat migration studies have been carried out in Latvia so far, the Agency is very interested in the studies carried out by the Estonian colleagues in the Gulf of Riga.
  - Figure 4-8 of Chapter 4.1.4 of the EIA Programme shows the bird density pattern for the Gulf of Riga and Pärnu, which is made of bird records for different seasons between the year 2010 and 2011. Since the records of seabirds may have a snapshot nature (birds have not been identified in the relevant records, but they may be present at another time), it is recommended to supplement these data with aerial records of the sea-wintering birds. The Agency has data from two full aerial records in the waters belonging to Latvia. This data can be combined with the Estonian records of figures shown in figures 4-9 and 4-10 (not only for the species represented but for the establishment of generalized bird density models, as in Figure 4-8).
  - In Chapter 4.1.4. of the EIA Programme on bird research, the study of nesting colonies is mentioned and short methodology of it. It is also mentioned that the nesting colonies are not located on Kihnu Island, but in the Kihnu Strait, as far as is understood, on other islands. According to the data from the Atlas of Estonian nesting birds (Linnuatlas. Eesti Ornitoloojijahunig, Tartu, 2018), various seabird nest on the Kihnu Island, including protected species such as the Velvet Scoter *Melanitta fusca*, the Caspian Tern *Sterna caspia* and others, in addition, according to Estonian Birds data from the atlas shows that more frequent and larger colonies are located directly on the western side of Kihnu Island and on the small islands northwest of the Kihnu Island. When assessing the potential loss of feeding territories, it would be advisable to take into account not only the distance of feeding flights, but also the increase in competition for feeding places depending on the number of nesting birds for bird species with a feeding flight distance of more than 10 km and the potential increase in interspecific competition.

- Figure 4-7 of Chapter 4.1.4 of the EIA Programme would require an extended explanation and reference. Currently, uncertainties are caused by a break in the route line (or landfill) between the Ruhnu Island and the Kihnu Islands, which appears to divert the center of the migration path from the center of the planned construction area. It should also be taken into account that the so-called bird migration routes in nature have blurred boundaries, meaning that it is impossible to draw specific boundaries for them and they can be much wider than illustrated since the bottlenecks mentioned in the description are formed by terrestrial structures (promontories, islands), but in the open sea the deviations from the imaginary line can be greater, forming a gradual transition of the number of migratory birds from the center to the edges. Since it is problematic to make systematic (repeated and determining the direction and location of bird flight) observations in the open sea, the precautionary principle should be followed or automated solutions such as bird radar should be used for data acquisition. In the presentation shown at the meeting on October 12, the southern part of the planned Project area was left out, also excluding the bird migration path shown in the picture, but it is very important to correctly and in-depth evaluate whether this is enough.
- The Latvian Association of Fishermen (hereafter – the Association) informed that the Estonian fishermen have referred to the Association with a request to support Estonian fishermen and to provide an opinion on the planned offshore wind farm and its potential impact on fishing. Taking into account that the construction of such a potential wind park would have a very significant impact on both fishing and the state of fish resources, as well as other environmental issues, such as bird, marine mammals, etc., it is asked to provide information on the environmental impact of the planned offshore wind farm. By initially identifying risks and the impact of wind park on fishing, state of fish stocks and the environment, the Association strongly opposes the possible construction of this wind park.

The Bureau sent the Minutes of the public meeting to all stakeholders who participated in the public meeting and received opinions that there is no need for any ads for the Minutes.

The Bureau would like to express willingness to continue commenced successful bilateral cooperation in the next steps of the transboundary environmental impact assessment of the Project.

Best regards,

Daiga Avdejanova (signature\*) Director of Environment State Bureau of the Republic of Latvia

*\*Document is signed with secure electronical signature*

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