



6.4.2022

Ministry of the Environment in Estonia
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Notification by Estonia (Your number No 16-3/21/1696-5)

Answer to the notification in accordance with Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) for a planned offshore wind farm Saare-Liivi 5 in the Gulf of Riga

The Ministry of the Environment acknowledges that Finland received a notification from Estonia concerning the planned offshore wind farm, Saare-Liivi 5 in the Gulf of Riga. The developer of the project is Utilitas OÜ.

In its notification Estonia made reference to the Agreement between Estonia and Finland on environmental impact assessment in a Transboundary Context and to the discussions in the 13th meeting of the joint Commission on EIA pointing out that Finland has the possibility to make the decision on participating in the particular EIA procedure at the EIA programme stage. The Ministry of the Environment would like to thank Estonia for this and wishes to state, that it is not yet in a position to confirm its participation but wants to highlight the following.

It is vital to maintain the intactness and ecological functions of the Important Bird Areas (IBA) and other protected areas designated for migratory and non-migratory waterbirds, many of which host Finnish breeding birds on passage or during the winter. The Pärnu Bay IBA is in particular of critical importance for globally threatened species such as the Velvet Scoter (*Melanitta fusca*) and the Long-tailed Duck (*Clangula hyemalis*) with records of over 124,000 Long-tailed Ducks staging and/or wintering at the site. Whether these include Finnish breeders will be important information for Finland when deciding on the participation in the EIA of the project.

The development of offshore infrastructure in wintering and staging areas has originally been identified as a medium threat in the respective AEWA International Action Plan for these species (AEWA ISSAP). However, as the number and size of windfarms in the Baltic grows, the threat they pose is also estimated to increase. As noted in the AEWA ISSAPs, the most significant impact of such extensive development is likely to be displacement from favoured feeding areas, potentially forcing birds into sub-optimal sites.

Although it is understood that the planned windfarm will not encroach directly on the Pärnu Bay IBA, it will be extremely important to ensure that the windfarm does not endanger in particular the feeding habitats of both Velvet Scoters and Long-tailed Ducks which may also be located outside the protected area.



Studies conducted on Long-tailed Ducks in Denmark and Sweden show that reduced habitat use and displacement distances of up to 2 km from the wind farm footprint occurred for 5-6 years after turbine construction. Whilst some species habituate to turbines, and may even feed among them, there is no evidence for this in Long-tailed Ducks.

Wind farm construction also physically alters the benthic community e.g. mussel beds, particularly where cables and turbine foundations are established. Recovery, however, is relatively fast. While the net amount of available food may therefore not alter significantly, these resources may remain inaccessible to diving seaducks due to the disturbance effect from the presence of the turbines.

If sited inappropriately, wind farms may cause barriers to movement of Long-tailed Ducks, particularly if sited along migration bottleneck sites or other key movement corridors. A potential impact of such barrier effects is increased energy expenditure due to additional flight distances required to avoid turbines, leading to indirect mortality and/or reduced productivity due to poor body condition. Potential bottlenecks used by large numbers of seaducks on passage have already been identified in Estonia: in the Irbe Strait, Suur Väin, the straits between the mainland and Osmussaar and Naissaar islands, and around a number of prominent peninsulas (Tahkuna, Ristna, Pakri, Undva, Pärissaar). Other important sites may yet need to be identified.

Direct mortality from collision with wind turbines is also of concern, though collision risk in Velvet Scoters and Long-tailed Ducks is deemed negligible due to the predominantly low-level flights they exhibit and their apparent avoidance of wind farms. This may, however, present a higher risk for other migratory bird species which frequent the area.

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VN/11135/2022-YM-2

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