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The Ministry of the Environment
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Swedish answers to the notification in accordance with Articles 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) regarding the Saare Windfarm project in Estonia.

Sweden received a notification from the Ministry of the Environment in Estonia to participate in consultation under Article 3 of the Espoo Convention in relation to the planned windfarm project Saare.

Estonia has fulfilled their responsibility following from article 3 of the Espoo Convention by providing the Swedish environmental protection agency (EPA) with a notification regarding the project.
The Swedish EPA has in turn invited Swedish government agencies, organizations and other parties to give consultation comments on the planned project.

Consultation in Sweden

The notification and the attached documents have been circulated for consideration to 9 central-government agencies, 4 county administrative board, 4 non-governmental environmental organizations during the period from 5th of June 2020 to 10th of August. The documents have also been available on the Swedish EPA website www.naturvardsverket.se/Esbo

The Swedish EPA is the authority responsible for fulfilling the obligations following from, inter alia. Article 3 of the Espoo Convention. However, the Swedish EPA has no responsibility to evaluate the consultations received in the context of the Swedish national consultation procedure with a view to presenting an overall Swedish position. For a comprehensive view of the consultations, we refer to the enclosed statements received.

Consultations comments received

A brief summary of the statements is included below, please note that the summary is written on behalf of the Swedish EPA and not the body to which a proposal is referred for consideration:

Swedish Board of Agriculture, The Swedish Transport Agency, Swedish Armed Forces, Swedish Meteorological and Hydrological Institute and Geological Survey of Sweden replied that they had no further comments.

The county administrative board of Gotland comments on the need to investigate how different species (fish, birds, mammals) that are protected in Swedish waters can be affected indirectly through loss or disturbances of growth / foraging areas. Further they express the need to analyze the cumulative effects of other ongoing projects in the Baltic Sea. For full statement, see attached.

The Swedish Agency for Marine and Water Management comments on the importance to describe the overall knowledge about the possible occurrence of the Red listed Porpoises in the area. The upcoming EIA should thoroughly describe which methods will be used for preliminary investigations of the seabed, during the construction of the foundations, which underwater noise levels that will occur at different distances from the source and what protective measures that will be taken to prevent the negative impacts. For full statement, see attached.

Swedish Transport Administration highlights the important maritime traffic route that exist between Almagrundet in the Stockholm archipelago and the Gulf of Riga. In the material received it was not possible to determine whether the planned offshore windfarm Saare will affect the accessibility to the Gulf of Riga. However, if the passability of maritime traffic is taken into consideration when locating and constructing the windfarm, the Swedish Transport Administration has no further comments.

Bird Life Sverige wishes to emphasize the importance of the planned wind farm located in one of the most extensive routes for seabirds in the whole of Eurasia. Seabirds stretch along the west coast of Estonia during both spring and autumn. In the spring, the vast majority fly up through the Baltic Sea, into the Gulf of Finland and then further up towards the Russian tundra, to make the reverse journey during the autumn. The west coast of Estonia is also a wintering ground for many seabirds. The forthcoming environmental impact assessment should include analyzes of how the migratory bird migration may be affected by the planned wind farm and the planned impact of the planned wind farm on important foraging and wintering areas. BirdLife Sweden encourages Estonian authorities to contact the Estonian Ornithological Society (EOS) for discussion about possible adaptations.

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

For the Swedish Environmental Protection Agency

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Point of contact for the Espoo
Convention

Attachments

Comments from the county administrative board of Gotland
Comments from the Swedish Agency for Marine and Water Management
Comments from the Swedish Transport Administration
Comments from BirdLife Sverige

Cc

The Ministry of Environment in Sweden, Emma Sjöberg