



SWEDISH
ENVIRONMENTAL
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2025-01-03

Case number
NV-06109-20

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Sweden's comments regarding plan for wind power plants, Karhakkamaa, in Tornio Finland in the complementary consultation in accordance with Article 4-5 of the Convention of Environmental Impact Assessment in a transboundary Context (Espoo Convention) and article 10 in the associated protocol (SEA) - SYKE/2023/554

The Finnish Environmental Institute (SYKE) has invited Sweden to take part in a complementary consultation regarding the local master plan for maximum 48 wind power plants with a maximum height of 300. The plants are planned in Karhakkamaa, Tornio city, Finland approximately 4 kilometres from the Torne River and the Swedish border.

The consultation is carried out in accordance with Article 4 and 5 of the Convention of Environmental Impact Assessment in a transboundary context (Espoo Convention) and article 10 in the associated protocol for strategic environmental assessments (SEA).

Consultation in Sweden

The document for consultation, the revised environmental assessment has been circulated for consideration to Swedish central government agencies, the relevant county administrative board, organizations and the public during the period from 18th October until 19th December 2024.

On the 21th of November a public meeting was held physically in Finland, in Tornio, with a possibility to attend on-line.

This consultation is a complementary consultation. All comments given during previous consultations in 2020 and in April 2024 should be considered together with the comments received during this consultation.

The Swedish EPA is the authority responsible for fulfilling the obligations following from, inter alia, Article 3 of the Espoo Convention and the protocol (SEA). However, the Swedish EPA does not evaluate the consultations received 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 with comments is provided below, please note that the summary is written by the Swedish EPA and not the referred body. All statements are attached and have to be read in full.

Comments from central government agencies, the county administrative board in Norrbotten and the Finnish-Swedish Transboundary River Commission

The Swedish Transport Administration and The Swedish Energy Agency have no comments, however the later would like to be informed regarding the continued process.

Sámediggi / Sametinget notes that the area above Karungi, towards the river, is a national interest area under Chapter 3. 5 § of the Environmental Code for thriving land for reindeer husbandry. It cannot be ruled out that the wind farm will significantly impede reindeer husbandry, which may mean that the value of the national interest area is lost. The reasons are that according to the noise survey, Sweden can be affected by noise and the photomontages indicate that the lights from the wind power plants reach over the river, as Sámediggi perceives. The turbines could then significantly impede reindeer husbandry for the Liehittäjä Sámi community, as there are reindeer habitat closest to the river. A dialogue with the Sámi community is recommended to conduct a reindeer husbandry analysis. The Sámediggi leaves further information regarding the area of national interest and recommendations for EIA/SEA regarding Sámi land use (see <https://www.sametinget.se/4175>, note that the link in the full statement should be replaced by this). Read the full statement for details and further information.

County Administrative Board of Norrbotten states that the planned wind power plants can have a significant damage to parts of the cultural heritage, area of national interest, along the Torne River in Sweden. The area is of national interest in Sweden and in the improved EIA it is stated that that the Torne River valley, as a nationally designated cultural heritage area, has a sensitivity to impact that is estimated to be at the same level as a nationally (Finnish) valuable landscape area. The revised EIA also makes it clearer that the Korpikylä village (located in the vicinity of the wind farm on the Swedish side of the river) is open and small-scale and that the landscape's sensitivity to change is high. The administrative boards present their reasons why the planned wind power farm may have a significantly negative damage on the parts of the area of national interest in Sweden and that the differences in jurisdiction and legislation mean that the river valley cannot be considered as a unified landscape where the common history is valued and managed in a consistent manner regardless of where the damage occurs. A wind energy development that is examined under Swedish law is not authorised if it causes significant damage to an area of national interest. The county boards statement has to be read in full text.

The Finnish-Swedish Transboundary River Commission notes in it's supplementary statement that the Finnish and Swedish reports are different in scope and that the choice of scale in the assessment affects the conclusions on whether the impact is significant and to which degree. The text and the tables are not consistent in all respects. For example, the rather negative economic impacts on the tourism industry, which is carried out in businesses located in small communities along the Torne Valley, identified in the text, appear in the table as

minor or moderate when the assessment is extended to the entire impact area. The Commission notes that the assessment of the impact on the landscape as a whole does not take into account, to any great extent, the local/regional significance of the impact on the valuable villages or sub-areas in the riverside on the Swedish side. See full statement for references and further information.

Comments from municipality

Haparanda city states, inter alia, that Torne River is a characteristic landscape with significant high values, natural and cultural, that need to be protected. The planned wind power plant will, according to the EIA, dominate the landscape scenery on the Swedish side of the river. The landscape will be altered and the settlements in Sweden will be impacted by the warning lights which are more visible on longer distances. There is already an impact from existing plants in Kitkiäsvaara which will be increased if further parks are planned, such as Haapamaa. Documents, visualisations and discussions how the landscape will be impacted by other planned parks, the cumulative effects, are missing. See full statement for details and further issues raised

Comments from organizations and local businesses

Nivagården, oppose to the projects because of the impact on landscape and the living conditions for Swedish people in the river valley on the Swedish side of the river that is stated to be more impacted by flashing lights and nuisance than the Finnish side. See comments in the full statement.

Hulkoffgården AB submits a supplementary statement and opposes to the plan/project. Hulkoffgården states that he residents on the Finnish side of Korpikylä will hardly see the planned wind turbines, but the Swedish side will have the entire wind power industry in their field of vision. To only consider the residents on the Finnish side is offensive, disrespectful and to belittle the living conditions in Sweden. They have through the process requested an animated video to visualize the wind power plants from the Swedish side, see further information and details in the attached statement.

Comments from the public

The Swedish EPA have received letters from the public, eleven letters in total. Some letters represent more than one person and some people have sent the same letter. One letter (no 2) is in Finnish and the comments and statements made in that letter have not been included in the summary below.

All the public, respondents to this complementary consultation, are opposed to the plan and project and many requests a reconsideration, that alternative 0 should be chosen, or that alternative localisations further away from the Swedish border be considered. The reasons given are mainly the negative impact on the landscape and the living conditions, for the people living in the area and for future generations. The landscape and the living conditions will be negatively affected by the flashing lights and the visibility of the wind power plants, and noise, on the Swedish side of the Torne River in the valley with unique natural and cultural values such as the area of national interest for cultural heritage and for Nature 2000. The river valley and its natural and cultural heritage is also considered to be part of the identity of "Tornedalen".

There are also concerns about cumulative impacts from other planned wind farms that also could cause damage the attractiveness of the area both for the

people who lives here and for tourists. The tourist industry will be negatively affected.

One opposes to the survey to the people living in the area and that, among other things, too few people have been interviewed.

Other issues raised are the negative impact on inter alia flora and fauna including reindeer, migrating birds, activities such as fishing and hunting, and the Natura 2000-area which is of interest to both Sweden and Finland. Issues regarding reduced value of housings have also been raised and one person states that Tornio city will be responsible for that. In addition, there are comments regarding a missing visualisation (page 95 picture 50), an animated photo visualising alternative 1 seen from Risudden during the spring when there are no leaves.

The above text is a summary of all statements and each of them have to be read in full text.

The Swedish Environmental Protection Agency's concluding opinion

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During the previous consultation the Swedish EPA received several statements pointing out the major impact that the project, plan, would have on Swedish interests if it was given a permit in its presented layout and scope. Also in this complementary consultation statements regarding, inter alia, significant damage to parts of the cultural heritage area of national interest along the Torne River and the area of national interest for reindeer farming, the negative impact on landscape scenery and nuisance from noise and lights, have been received. The cumulative effects from many planned projects are also raised and the lack of materials and discussions regarding cumulative effects. The county administrative board points out that differences in jurisdiction and legislation mean that the river valley cannot be considered as a unified landscape where the common history is valued and managed consistently, regardless of where the harm occurs.

In order to comply with the Espoo-conventions idea, to take all appropriate and effective measures to prevent, reduce and control significant adverse transboundary environmental impacts from proposed activities, the comments submitted by Swedish parties should be responded to.

Based on received comments, expressing the negative transboundary impacts and the objections raised by Swedish authorities, organizations and the public against the project, and that there are many projects planned in the area, the Swedish EPA wish to continue the consultation under article 5.

The decision has been made electronically and there is no need for signatures.

For the Swedish Environmental Protection Agency

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Head of Unit

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Point of Contact for the Espoo
Convention and the protocol

Attachment with comments from:

Sámediggi / Sametinget

Swedish Energy Agency

The Swedish Transport Administration

County Administrative Board in Norrbotten

The Finnish-Swedish Transboundary River Commission (statements both in
Finnish and in Swedish)

Haparanda City

Hulkoffgården AB

Nivagården

Eleven letters from the public(named “Letter from public no 1-11)

Copy

Bastian Ljunggren and Eleonora Rönström Ministry of Climate and Enterprise

Ulla Helminen and Wilma Poutanen, Finnish Environmental Institute