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

The Finnish Environmental Institute (SYKE) has invited Sweden to a consultation regarding a municipal plan ("generalplan") for maximum 48 wind power plants with a maximum height of 300 m in Karhakkamaa, Torneå municipality in Finland. 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 the associated protocol (SEA).

The previous Swedish answer to the notification in accordance with Article 3 of the Convention

The Swedish Environmental Protection Agency (EPA) as point of contact in Sweden has previously (20 October 2020) responded to the notification from SYKE and indicated that Sweden will participate in the further process. The concluding opinion of the Swedish EPA was that the Espoo-convention and its Protocol, but also Directives 2001/42 and 2014/52 should be applied, with regard to, amongst other things, reasonable alternatives to location and technical designs as well as the cumulative environmental impact.

Consultation in Sweden

The documents for consultation including the plan and the environmental impact assessment have been circulated for consideration to Swedish central government agencies, the relevant county administrative board, organizations and the public during the period from 2th February to 29th of March 2024. A public meeting was held in Sweden on 22th of February 2024.

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 from central government agencies, county administrative board, Övertorneå municipality, organisations and the public

A brief summary of the statements with comments is included below, please note that the summary is written by the Swedish EPA and not the referred body. All statements are attached and should be read in full text.

County Administrative Board of Norrbotten assess that the planned wind power park will have a negative impact, a noticeable damage, on the UNESCO world heritage area “Struves Meridianbåge” if the visual connection between triangular points will be diminished. This negative impact should be considered in the permitting process. The County Administrative Board also assess that the planned project may have a remarkable negative impact on the cultural heritage in Torne älvdal which is of national interest (riksintresse för kulturmiljö). The most affected areas are Korpikylä and Risudden which both hold core values in the area of national interest. The county administrative board explains the Swedish legislation system with areas of national interests and what can be allowed or not if there is a significant negative impact on a national interest. In addition, the authority states that cumulative effects, of the planned wind power plants in Karhakkamaa and the existing wind power plants, on the landscape and the core values in the cultural heritage area have to be presented and considered.

Finsk-svenska gränsälvscommissionen states that there is information and analysis missing in the documentation, such as an overall analysis of how the area of national interest in Sweden can withstand such a negative impact from the planned project on the landscape on the Swedish side of the Torne river. Furthermore, the commission raise the need to assess if an environmental permit process for the project should be required. The commission also encourages the assessment of alternative solutions, that do not affect the landscape and the living conditions in the area of the Tornio and Muonio rivers. Further information and details are given in the full text attached.

Sámediggi / Sametinget understands that the local master plan has been drawn up on the basis of two alternatives. For reindeer herding and the Sámi culture in Sweden Sametinget / Sámidiggi prefer VE2 / ALT2, since there will be a larger distance between the turbines and the Torne River. The project might also lead to indirect negative impact on the ability for reindeers to graze in peace. They further highlight research that shows that reindeers are disturbed by the flashing lights of the turbines and avoid grazing in wind power areas where the lights are visible. The avoidance effect can be up to 12 kilometres. A list of research reports on effects on reindeers from wind power plants is included in the full text.

Trafikverket point out that heavy transports can have an impact on roads, and that transports to the project area have not been described in the documentation. Trafikverket leave information regarding Swedish legislation for roads and transports and wishes to be further informed if transports will take place on Swedish roads.

Övertorneå kommun/municipality states that it represent the municipality and its residents and businesses. The municipality requests that the Municipality of Tornio does not adopt the plan for Karhakkamaa wind farm. The reasons are elaborated in the attached full text and summarised below.

The municipality assess that the planned wind power farm would have a transboundary negative impact on the landscape in a vast Swedish area with national interests for cultural heritage, outdoor sports and nature. They refer to the European Landscape Convention and that the landscape is an important issue of democracy to the public. There should be a response to the public opinion, and mitigation measures should be proposed. The planned project is on a much larger scale than other exploits in the area. Warning lights are assessed to have a large negative impact for visitors, as well as inhabitants and the tourism sector. The wind power plants will be visible from many housings and there are concerns that their economic value will be reduced. The municipality requires an additional analysis regarding the cumulative effects from all planned and existing projects, having an impact on the area and the Nature 2000-area Torne river.

The municipality has recently adopted a position of no wind power plants within Torne älvdal because of the unique landscape, and to not reduce the attractiveness of the area for inhabitants or national and international tourism, and in addition with regards to Torne river being one of four Swedish national rivers. The area has high cultural values and today a low grade of light pollutions. The municipality further state that the tourism sector and the business development will be negatively impacted by the planned project. Details and developed reasoning can be found in the full text as well as a question regarding the landscape plan (Landskapsplan för västra Lappland, 2014).

Comments from the public

The Swedish EPA have received about 40 letters from people living in the area. All except for one oppose to the project and raise concerns regarding various transboundary effects. The views expressed in the statements from residents on the Swedish side concern the negative impact on the landscape and the cultural heritage, the quality of life, the people living in and visiting the area, the unexploited Torne river and the flora and fauna for example in the Nature 2000 area. The main part states that there will be a negative transboundary effect in the area on the Swedish side of the river by the wind power plants, and their warning lights. The area on the Swedish side of the river is flat and alongside the river facing towards east. Many people also state that there is already a negative effect from existing wind power plants in Finland, and that cumulative effects have to be taken into account. Visual, animated, presentations of the wind power plants seen from the Swedish side of the river have been requested.

Alternative localisation for the wind power plants has been requested as well as a requirement for an environmental permit.

A large number of the respondents state that they intend to demand compensation for reduced quality of life, ruined landscape, reduced value of the property and some also lost income from tourism. Some also raise the transboundary effect on relations between the countries.

Other issues raised are the effects of infrasound and noise and that an environmental permit should be required to regulate the noise levels. There are also concerns regarding pollutions from microplastics and the effect on water from ditching. Furthermore, negative impacts on flora and fauna were raised by the public that also miss information regarding these consequences in the EIA. Many also provide information about birds living in the area and other animals. All the letters from the public, in full text, are included and need to be a part of the final decision.

Comments from Organisations

Övertorneå Naturskyddsförening oppose to the project since it is located close to Torne river and the unique area, a national river and a Nature 2000 area. Naturskyddsföreningen also states that there are deficiencies in the EIA such as lack of description of nature values and that a field inventory needs to be conducted.

Föreningen KulturEkot i Korpikylä states that the area and the life conditions dramatically would change negatively if the wind power plants would be established. They question the flashing lights during both day and nighttime. They highlight the cultural and nature values in Tornedalen, an unexploited environment, valuable for both inhabitants and the tourism which would be negatively impacted by the project. They further inform that they are involved in an application for a new UNESCO world heritage area with focus on the unique salmon and whitefish netting culture.

Matakoski Fiskeförening states that the area Tornedalen is of national interests in Sweden for outdoor sports, nature and cultural heritage. The members are already negatively impacted by the existing eight wind power plants that can be seen from a long distance along the river. The organisation highlights the values of the area and the landscape and requires an animation of how the planned wind-power plants will be seen from Korpikylä. They also raise concerns regarding pollutions from construction and maintenance of the plant and impact on human health, flora and fauna.

Comments from companies

Nivagården oppose to the project. They state that the area Tornedalen is of national interest in Sweden for outdoor sports, nature and cultural heritage and assess that the planned project will reduce the interest for future housings and development in Korpikylä. The company requires an animation of how the planned wind-power plants will be seen from Korpikylä.

Hulkoffgården AB oppose to the planned project. They rise concerns regarding nature and culture values and state that they can not develop their tourism business if the wind power plants are constructed.

The Swedish Environmental Protection Agency's concluding opinion

The Swedish EPA has received a number of statements pointing out the considerable impact the project would have on Swedish interests if it was given a permit in its presented layout and scope. These negative impacts include, inter alia, the projects disturbance of the joint World Heritage “Struves meridianbåge”, the Swedish national interest for cultural environment in Torne älvdal, negative impact on the Natura-2000 protected “Torneälv”, the lack of assessment of the project’s cumulative effects and the overall negative impact on people’s health and business on the Swedish side of the river.

Based on received comments, expressing the negative transboundary impacts and the objections raised by Swedish authorities, organizations and the public against the project, the Swedish EPA wish to continue the consultation under article 5. To follow 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 presented from Swedish parties including their suggestions of further

investigations and assessments should be responded to and presented for Swedish parties to comment on.

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 Department

Richard Kristoffersson
Åsa Blomster
Point of Contact for the Espoo
Convention

Attachment with comments from:

Energimyndigheten
Hulkoffgården AB
Föreningen KulturEkot i Korpikylä
Korpikylä hembygdsförening
Länsstyrelsen i Norrbottens län
Matkakoskki Fiskeförening
Nivagården AB
Sámediggi / Sametinget
Finsk-svenska-gränsälvskommissionen
Trafikverket
Övertorneå kommun
Övertorneå Naturskyddsförening

40 letters from the public

Copy

Klimat- och näringslivsdepartementet: Sandra Jalalian, Bastian Ljunggren och Eleonora Rönström

Laura Altala-Martesuo och Ulla Helminen, Finnish Environmental Institute