



SWEDISH
ENVIRONMENTAL
PROTECTION
AGENCY

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Swedish answers to notification in accordance with the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) and the associated protocol (SEA) regarding local master plan for wind farm, Röyttä, Tornio city, (SYKE/2024/317)

Sweden received a notification from the Ministry of the Environment in Finland to participate in consultation regarding amendment of local master plan for off-shore wind power plan outside Röyttä in Tornio municipality.

A brief summary of consultation comments is presented in this document as well as a concluding opinion. All statements, in full text, are attached.

Consultation in Sweden

The notification and documents for consultation including a program för participation and assessment have been circulated for consideration to Swedish central government agencies, the relevant county administrative board in Norrbotten county, the municipality, organisations and the public during the period from 7th April to 3th of May 2024. The documents have also been available on the Swedish EPA website www.naturvardsverket.se/Esbo.

The Swedish Environmental Protection Agency, with the assistance from the Haparanda municipality, arranged a public meeting on 11th of April 2024 in Haparanda, Sweden. The developer and Tornio municipality presented the plan. It was possible to attend both digitally and physically. The meeting and the notification were announced in the local press.

The Swedish EPA is the authority responsible for fulfilling the obligations following from the Espoo Convention and the protocol (SEA). However, the Swedish EPA does not evaluate the consultations received and do not present an overall Swedish position. A brief summary of the statements is included below. Please note that the summary is written on behalf of the Swedish EPA. For a comprehensive view and the details of the consultation comments, we refer to the enclosed statements received, see attachments.

Consultations comments received from central government agencies

Swedish Agency for Marine and Water Management (Havs och vattenmyndigheten) points out the need to continue to participate in the environmental assessment process of the planned wind farm with reference to its

potential transboundary impact on Sweden. The impact on fur seals, migrating fish, outdoor life's recreational values, Swedish fish industry and cumulative impacts of planned or existing wind farms, among other things, should be included in the environmental impact assessment. The agency also states that the Swedish Maritime Spatial plan should be considered as well as the current ongoing process to update the plan with an increased number of areas for energy production. Further details are given in the attached statement.

The Swedish Environmental Protection Agency (Naturvårdsverket as the expert authority for natural environment issues) states that the establishment of a wind power plant at the current location can be assumed to have a significant environmental impact in Sweden and therefore want to continue participate in the process. The wind farm is planned in close proximity to areas in Sweden of national interest for nature conservation and outdoor life and the impact on these values need not be investigated in the environmental impact assessment. Furthermore, in addition to birds and natural value inventories, an inventory of bats is required. Depending on the presence of species appropriate protective and mitigation measures will be required to minimize negative impact on sensitive species. As the planned wind farm affects sensitive environments, it should be stated what is the basis for the chosen location of the wind farm. In addition an analysis of the cumulative effects of this and other planned and ongoing activities in the area is required. Further details are given in the attached statement.

The Swedish National Heritage Board (Riksantikvarieämbetet) states that the world heritage area "Struves meridianbåge" has to be taken into consideration in the environmental impact assessment. Regarding other cultural heritage issues the board refers to the county administrative board's consultations comments.

Swedish Maritime Administration (Sjöfartsverket) will take part in the further process. They state that the plan overlay a fairway which may have a negative impact on shipping both in Sweden and Finland. The authority states a list of what have to be investigated and considered, for example cumulative effects, the wind power plants effects on radar and radio systems, the effect on icing etcetera. For a complete list and further details see attached statement.

Other agencies

The Swedish Armed Forces has not given any statement. The Swedish Energy Agency (Energimyndigheten) has no comments but wish to be kept informed in the further process. The Swedish Transport Administration (Trafikverket) has no consultation comments. Transportstyrelsen will not take part in the further process but states that there is a fairway in the planning area that must be considered.

Finnish – Swedish Transboundary River Commission questions the suitability of the selected area for the wind power project outside the mouth of Torne älv given that there is an ecological corridor for migratory fish through the area and notes that it may prove to be a risk to the fish stocks' living conditions. The wind farm can generate income for the city of Torneå, but the negative effects extend to all municipalities upstream. The commission states that there might be an impact on migrating fish and that cumulative effects from all projects have to be assessed. More comments regarding fishes, fishing and the Nature 2000-area are presented in the full attachment.

Consultation comments received from county administrative board and municipality

County administrative board of Norrbotten (Länsstyrelsen i Norrbottens län) considers that Sweden should participate in the environmental impact assessment. The planned wind farm is assumed to have significant environmental transboundary impact on among other things areas of national interest for outdoor life and cultural heritage. Motives and details are given in the full statement attached. The county board states that the following has to be assessed and presented in the environmental impact assessment such as the impact on the Nature 2000 area Torne and Kalix river systems, areas of national interest for outdoor life according to the Swedish Environmental Code, area of natural interest for cultural heritage, nature protected area and the risks for invasive species, impacts on bats and fish migrating. There are many projects in the sea area and cumulative effects have to be considered and presented.

Haparanda municipality points out that the comprehensive plan in Haparanda, which not recommend construction of wind power plans in the river valley of Tornedalen and the sea area, has to be considered. They also state that a new environmental impact assessment for the plan for Röyttä is required with a specific chapter presenting the transboundary impact. Further details regarding the content in the environmental impact assessment are given in full attachment but the following aspects have to be considered, fishes and fishing, areas of national interest for outdoor life, noise levels, sediment, alternative localisation and cumulative effects.

Comments from Swedish associations

Naturskyddsföreningen in Norrbotten comments that wind power must not be built in protected areas such as Natura 2000-areas, in areas of national interest, in marine protected areas etc and when plants are constructed mitigation measures have to be taken during all phases. Further conditions for permit and planning are given in their full statement. The organisation also states that there will be a significant transboundary environmental effect and that Sweden will take part in the upcoming process. The impact on migrating birds and birds in the adjacent Nature 2000-area as well as bats have to be considered. Questions regarding the planned nature protected areas has been raised and recommendations for what to include in the impact assessment has been given, see attachment.

Norrbottens Kustfiskares PO points out that the planned project will have a negative impact on the yearly migration of fish from May to October and that the most negative impact will be during construction phase. The organisation requires that fish migration must be investigated by Finnish and Swedish marine researchers, that no construction take part until the month of September each year and that compensation is ensured, prior to permission to establish the wind farm, to affected professional fishermen for reduced catches and soiled gear.

Consultation comments received from the public

26 house owners in the archipelago, on the Swedish side of the border, has signed a joint statement. They state that the plan will have a crucial negative impact on the archipelago of Haparanda which is of national interest för nature conservation and outdoor recreation. Visualisation of the park, the impact on birds and the noise levels etc. have to be investigated and assessed.

The Swedish Environmental Protection Agency's concluding opinion

Based on the comments received, Sweden would like to participate in the upcoming process since there is a likely risk for significant transboundary effects on, among other things, mitigating fish, fur seals, bats and birds as well as nature conservation, cultural heritage and outdoor life recreational values. There are areas of national interest for cultural heritage and outdoor life in the Swedish sea area. The sea traffic may also be impacted since a fairway is located in the area. In addition, many agencies and organizations states that cumulative impacts from other projects and all planned and existing wind power plants have to be considered and that it should be stated what is the basis for the chosen location of the wind farm. Investigations and research have to be conducted to get input to the assessment. Further details are given in the attached statements.

Due to the transboundary environmental impact pointed out in the opinions regarding the planned project, it may entail special emphasis that both the Espoo convention and its Protocols and also Directives 2001/42 / EU and 2014/52 EU shall be applied, with regard to, among other things, the definition of “impact”, that reasonable alternatives to location and technical design are described and assessed as well as the cumulative environmental impact.

The Swedish Environmental Protection Agency would also like to point out the need to assess the potential application of the “Nordiska Miljöskydds-konventionen” or the “Gränsöversörensöverenskommelsen”, among other things as there are a large number of individuals in Sweden who consider themselves affected by disturbances from the proposed project in Finland. Individuals must be given the opportunity to file a lawsuit in the decision-making process, as well as for compensation for damage and the opportunity to appeal in accordance with these conventions and agreements.

A decision on this letter has been made by Nanna Wikholm, Head of unit for urban planning after presentation by Åsa Blomster.

In the final processing Egon Enocksson, Point of Contact for the Espoo Convention and the protocol, has attended.

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

For the Swedish Environmental Protection Agency

Nanna Wikholm

Head of Unit

Åsa Blomster

Administrative official for the Espoo
Convention and the protocol

Attachment with comments from:

Swedish Agency for Marine and Water Management (Havs- och vattenmyndigheten)

The Swedish Energy Agency (Energimyndigheten)

The Swedish National Heritage Board (Riksantikvarieämbetet)

The Swedish Transport Administration (Trafikverket)

Transportstyrelsen

Swedish Maritime Administration (Sjöfartsverket)

Swedish Environmental Protection Agency (Naturvårdsverket)

County Administrative Board in Norrbotten (Länsstyrelsen i Norrbottens län)

Finnish – Swedish Transboundary River Commission (swedish Finsk-svenska Gränsälvscommissionen)

Haparanda stad

Naturskyddsföreningen i Norrbottens län

The public (one letter)

Copy

Finnish Environmental Institute: Laura Altala-Martesuo and Ulla Helminen,

Klimat- och näringslivsdepartementet: Bastian Ljunggren, Eleonora Rönström