



SWEDISH
ENVIRONMENTAL
PROTECTION
AGENCY

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NV-06488-24

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Sweden's comments regarding plan for wind power plants, Haapamaa in Torneå Finland in accordance with Article 3 of the Convention on Environmental Impact Assessment in a transboundary Context (Espoo Convention), and in accordance with Article 7 in the associated protocol for strategic environmental assessment, (SYKE/2024/686 and SYKE/2024/1627)

The Finnish Environmental Institute (SYKE) has notified Sweden pursuant to Article 3 of the Espoo-convention and Article 7 of the protocol on strategic environmental assessment in a transboundary context for Haapamaa wind farm. The site is located approximately nine kilometres from the Swedish border and Torne river and approximately 10 kilometres from Karungi in Sweden.

The consultation process in Sweden, has been a joint process for the notifications regarding the Espoo convention and the protocol on strategic environmental assessment. The consultation lasted from 9 September until 4 November 2024.

The Swedish Environmental Protection Agency hereby acknowledges having received the notifications and based on statements made by the Swedish respondents, hereby expresses the intent to participate in the upcoming Espoo-processes according to the Espoo-convention and the protocol.

Consultation in Sweden

The consultation in Sweden has been conducted as a joint consultation and all documents, both for the local master plan and the project, were circulated for consultation to Swedish central government agencies, the relevant county administrative board, municipalities and non-governmental organizations until 5 September until 5 November 2024. The documents have also been published on the Swedish EPA's website www.naturvardsverket.se/Esbo. A public meeting was hold on 15 October 2024 in Hedenäset, Sweden.

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 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.

Comments received

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.

Comments from central and regional government agencies

The Swedish Energy Agency leave no comments but would like to be informed regarding the further processes.

The Swedish Transport Administration has no comments on the project or the plan.

The Swedish National Heritage Board would like to take part in the further processes and raise the need for an analysis of the impact on the cultural heritages and the possibility to experience and understand the cultural and historical context. The SEA/EIA have to be complemented with a HIA (heritage impact assessment) regarding potential impact on the UNESCO world heritage area “Struves meridianbåge”. In addition, visualisation materials, from sites in Sweden are required.

The Finnish - Swedish Transboundary River Commission consider that due to the geographical location, the impact of the power plant's aircraft obstruction light at night and during the long dark season needs to be carefully evaluated and illustrated. Previously videos have been requested. Also, the combined impacts with other wind energy projects should be analysed against the tolerance capacity of the landscape. The commission considers that a survey should among the population also be carried out within the project's area of influence on the Swedish side, and not only in Finland, in order to obtain an overall picture of the impacts in the lower Torne River Valley. See enclosed statement for more information.

County Administrative Board of Norrbotten consider that Sweden should participate in the following process and states that the impact on cultural heritage has to be assessed and reported since the river valley is of national interest and sensitive for impact from high/monumental objects/buildings. Details regarding sensitive areas, information regarding the landscape and cultural heritage, what to assess and take into account including cumulative effects is presented in the full statement. The county administrative board also comments that *the impact and potential damage* on the UNESCO world heritage area “Struves Meridianbåge” has to be analysed and that a HIA (heritage impact assessment) may be required, see the full statement for further information.

Comments from municipalities

Haparanda city refers to their own comprehensive plan that states that the flat landscape in the river valley and the archipelago are sensitive and therefore Haparanda City is restrictive to wind power establishments in the Torne river valley, coast and archipelago. Alternative localisations to Haapamaa should be investigated and the choice of site should be motivated. The city also states that cumulative effects of all planned plants have to be taken into account. Visual impact has to be considered and visual materials, of great range – see details in

the enclosed document- have to be presented as well as the impact on both nature and cultural values. The city also leaves comments regarding potential impact on flora and fauna see enclosed statement for further details.

Comments from the non-governmental organizations

BirdLife Sverige cannot see any significant risks regarding transboundary effects on birds. The organisation assumes that the consequences for birds and their habitats are investigated and minimised and recommends that BirdLife Finland is consulted. A loss of habitat could otherwise have a transboundary effect for birds, see enclosed letter for more details.

Naturskyddsföreningen i Norrbotten states that it is relevant to take part in the further environmental assessment processes and states that transboundary effects or risk for effects, are considered to be polluted water to the river and the surrounding groundwater, noise and light and loss of habitat and as a result of that ecological consequences. The organization suggests that the competent authority requires an assessment of all environmental etc. consequences from all planned plants, see enclosed statement for further information.

Comments from the public

The Swedish EPA have received five letters from the public, which must be read in full text. All oppose to the project and leave comments such as that the site Hapaamaa is not suitable for wind power plants due to the transboundary impact, potential impact or due to cumulative effects. There may be negative impact on the landscape and the living conditions due to warning/obstacle lighting and also the tourism sector may be negatively impacted. Other effects of the wind power plant may be increased flow of acid water to the river and consequences for fish such as salmon. Many states risk for negative impact on landscape and cultural heritage since the area is of national interest as well as a Nature-2000 area. Other issues raised are the need of an environmental permit to regulate noise, economical aspects etc – as stated above all enclosed letters have to be read in full.

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

For the Swedish Environmental Protection Agency

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Head of Unit

Åsa Blomster

Point of Contact for the Espoo
Convention

Attachment with comments from:

The Swedish National Heritage Board

The county Administrative Board in Norrbotten

Finsk-svenska-gränsälvscommissionen

Haparanda city

Naturskyddsföreningen i Norrbotten

BirdLife Sverige

Letters from the public (named public 1-5)

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