



SWEDISH  
ENVIRONMENTAL  
PROTECTION  
AGENCY

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2024-11-07

Case number  
NV-04442-23

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## **Swedens consultations comments according to article 10 of the SEA protocol regarding the regional land use plan for Ostrobothnia 2050 in Finland, SYKE/2024/836**

In accordance with Article 10 of the Protocol on Strategic Environmental Assessment in a Transboundary Context, Sweden has been notified by Finland of the Regional Land Use Plan for Ostrobothnia 2050.

The consultation period in Sweden lasted from 23 September to 4 November 2024.

### **Consultation in Sweden**

The notification and consultation documents have been circulated for comments to Swedish central authorities, relevant county administrative boards, Swedish municipalities, non-governmental organisations and the public during the period 23 September to 4 November 2024. The documents have also been available on the Swedish EPA's website [www.naturvardsverket.se/Esbo](http://www.naturvardsverket.se/Esbo).

The Swedish Environmental Protection Agency is the authority responsible for fulfilling the obligations arising from the Espoo Convention and the Protocol on Strategic Environmental Assessment (SEA). However, the Swedish EPA has no responsibility for evaluating the consultation responses received and/or presenting an overall Swedish position.

Below is a summary of the opinions received. Please note that the summary is written by the Swedish EPA. For both an overall picture and the details of the consultation responses, we refer to attached opinions. All comments must be read in full.

### **Comments received**

#### **Comments from central government authorities**

*The Swedish National Heritage Board* has no comments at this stage.

*The Swedish Maritime Administration* states that maritime transport is of great importance to both Sweden and Finland and that it should be clarified whether Finnish authorities have been involved in the planning of areas for offshore wind

power and whether maritime transport has been taken into account. They make a general comment on offshore wind farms in the Bothnian Sea and that they could potentially have a major impact on maritime transport, and they refer to a list of points that should be investigated. See attached statement for a full list and further details.

*The Swedish Transport Administration* states that the potential for maritime transport must be taken into account and that it must be clarified how maritime transport, especially in winter and ice conditions, is affected by planned areas for offshore wind farms. They also provide an opinion on a physical connection between Finland and Sweden, see attached opinion.

*The Swedish Meteorological and Hydrological Institute (SMHI)* raises questions about the cumulative effects of offshore wind farms in the Baltic Sea. They also highlight the need for principles in international conventions and frameworks as well as the need for international co-operation to prevent large-scale impacts on the whole Baltic Sea area. See further information and details in the attached statement.

#### **Comments from the County Administrative Board**

*The County Administrative Board of Västerbotten County* is of the same opinion as stated in the environmental assessment that there are no transboundary environmental impacts. However, it should be mentioned in the SEA that knowledge of how to assess the cumulative effects of offshore wind farms in the Bothnian Sea especially regarding sea transport, especially during winter and birds and bats migrating in the Kvarken area.

*The County Administrative Board of Västernorrland* has no views on the areas planned for offshore wind power but notes that it is very problematic that cumulative effects from both planned Swedish and Finnish wind farms are not assessed and that there is a lack of knowledge to assess the impact. It should be mentioned that this knowledge is lacking. They also state that the impact on migratory fish must be considered. It should also be assessed and described how the environment, the landscape, is affected by climate change. See enclosed statement for more information and details.

#### **Comments from municipalities**

*Umeå municipality* states that central authorities in Finland and Sweden should assess the cumulative impact of offshore wind farms planned in both countries. The city comments on the infrastructure between the countries, the potential for co-operation and other aspects of the planned land use, see attached statement.

#### **Comments from non-governmental organizations**

*The Västerbotten Ornithological Society (Västerbottens ornitologiska förening)*, hereafter referred to as 'VOF', raises questions about migratory birds and considers that the area 'Norra Kvarken' is not suitable for offshore wind farms due to migratory birds. There are many migratory bird species in the area and a large number of birds. The VOF also states that knowledge of birds is needed to implement the right mitigation measures. Some knowledge is available in Sweden and should be combined with surveys from Finland. See further details in the attached document from VOF as well as two other letters from them presented in consultations regarding offshore wind farms.

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This decision has been made digitally and therefore lacks signatures.

For the Swedish Environmental Protection Agency

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Point of Contact, Espoo Protocol

**Attachments with comments from:**

The Swedish Transport Administration (Swedish)

Swedish Maritime Administration (Swedish)

Swedish Meteorological and Hydrological Institute (Swedish)

The County administrative board in Västerbotten (Swedish)

The County administrative board in Västernorrland (Swedish)

Umeå city (Swedish)

The Västerbotten Ornithological Society (Västerbottens ornitologiska förening)

3 enclosed documents named VOF 1-3) (Swedish)

**Cc:**

Ministry for Climate and Enterprise, Bastian Ljunggren and Eleonora Rönström