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The Ministry of the Environment  
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**Swedish answers to the notification in accordance with Articles 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) and the associated protocol (SEA) regarding the wind farm project Karhakkamaa.**

Sweden received a notification from the Ministry of the Environment in Finland to participate in consultation under Article 3 of the Espoo Convention and the associated protocol (SEA) in relation to the Karhakkamaa wind farm project.

Finland has fulfilled their responsibility following from article 3 of the Espoo Convention along with the protocol (SEA) by providing the Swedish environmental protection agency (EPA) with a notification regarding the project. The Swedish EPA has in turn invited Swedish government agencies, organizations, the public and other parties to give consultation comments on the EIA program.

**Consultation in Sweden**

The notification and the attached documents have been circulated for consideration to Swedish central government agencies, county administrative boards, municipalities, organizations and the public during the period from 14<sup>th</sup> of August to the 16<sup>th</sup> of October. A consultation meeting for the public was held by the developer in Övertorneå kommun on the 1<sup>st</sup> of October, both physically and online with Swedish interpreter. The documents have also been available on the Swedish EPA website [www.naturvardsverket.se/Esbo](http://www.naturvardsverket.se/Esbo)

The notification was also announced in local press.

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 has no responsibility to 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.

**Consultations comments received from central government agencies, county administrative board and municipalities.**

A brief summary of the statements is included below, please note that the summary is written on behalf of the Swedish EPA and not the body to which a proposal is referred for consideration:

*The Swedish Transport Agency, the Swedish Energy Agency and the Swedish Armed Forces* replied that they had no further comments.

*Övertorneå Kommun* comments on the need for Sweden to further participate in the upcoming process. Among other comments, the municipality assesses that the proposed wind farm may have a negative impact on the Natura 2000 area Torne and Kalix river system, the plan lacks a description of how the biological diversity will be affected and protected. The warning lights from the wind turbines will disturb the landscape and Övertorneå wishes this to be investigated further with alternatives such as radar control. Furthermore, Övertorneå worries that the planned project would strongly reduce the attractiveness of the municipality. *For full statements, please see attachment.*

*Finsk - Svenska Gränsälvskommisionen* notes that the planned project very likely will have a negative effect on the Swedish national interest of cultural environment Tornedalen. The commission comments on the projects transboundary impact on the landscape and highlights the need to conduct a full landscape analysis in the EIA. The cumulative effects also need to be addressed as there already are windmills in the area. The commission wants Sweden to further participate in the upcoming process. *For full statements, please see attachment.*

*Sametinget* express the importance to describe and assess the cumulative impact of the affected Sami villages in the EIA. The Sami Parliament believes that an overall assessment must be made of the consequences that may arise for reindeer husbandry within the entire Sami village and the impact on the Sami villages' functional connection must be weighed. Sametinget sees the need to further participate in the EIA. *For full statements, please see attachment.*

*Haparanda kommun, community building office* considers that it is of the utmost importance that the authority and the public on the Swedish side continue to have the opportunity to comment on the EIA. Within the planned area, which is classified as a "local area", there are several Swedish national interests in accordance with chapter 3 of the environmental code and the Natura 2000 area connected to Torne älv. The plans have not described how these areas will be affected by the proposed wind farm. *For full statements, please see attachment.*

*Haparanda Stad, the Municipal Board.* The location of the wind farm is such that in one of the most valuable landscapes and national interests and next to the Natura 2000 area for the Tornio River, it will greatly affect the landscape with its tall plants, its technically / safety-necessary lighting and shading at short and long distances. The municipality of Haparanda, based on the information received so far

and the decision not to carry out a complete environmental assessment, opposes the wind farm as it is now proposed as the area of influence and its effects have not been assessed. *For full statements, please see attachment*

**County administrative board of Norrbotten** considers that Sweden should participate in the environmental impact assessment because the project can be assumed to have significant environmental consequences for the Swedish side. The EIA should highlight the consequences through visualizations and illustrations from different perspectives in both height and sideways and a special assessment of the consequences for the villages of Hietaniemi, Päckilä / Bäckesta, Vitsaniemi / Risudden, Korpikylä and Kukkola and the sovereignty islands. The County Administrative Board estimates that the establishment will have a significantly greater environmental impact on the Swedish than Finnish side as the landscape space in the river valley is oriented towards the river. *For full statements, please see attachment*

**The Swedish Transport Administration** considers that the project after completion will not have any impact on the Swedish Transport Administration's transport infrastructure. However, there is no description regarding transportation during the construction phase. If any transports are planned through Sweden, the Swedish Transport Administration considers that a transport plan with a description of which roads will be used in the transports of the wind turbines is necessary and the administration express the wish to take part of these. *For full statements, please see attachment*

#### **Comments from Swedish associations**

The Swedish EPA received comments from 6 associations. ***Föreningen Kulturekot i Korpikylä, Korpikylä Bysamfällighet, Fiskeföreningen i Makakoski, Ekonomiska förening i Korpikylä, Sjukvårdspartiet i Haparanda, Konsthall Tornedalens Vänner and Torne-Lainio & Muonioälvars förening.*** *For full statements, please see attachments.*

#### **Comments from the public**

The Swedish EPA have received about 40 letters from people living in the area. The majority of the respondents oppose the project and put forward a large number of opinions on how they may be affected.

The views expressed in statements from residents on the Swedish side mainly concern the negative impact on housing and the quality of life. The concerns are expressed in connection to changes of landscape and noise, but also regarding the warning lights from the wind turbines which could be particularly troublesome. It is pointed out that the disadvantages of the establishment mainly end up on the Swedish side due to the view of the river from the Swedish side would be most affected. Worries are also expressed connected to the hospitality industry who fear that the project will have a negative impact on the future possibility to attract tourism.

It is also stated that the impact from the existing wind farm in terms of flashing lights and noise already are a disturbance, and due to the size of the Karhakkamaa project the fear is enhanced.

Some opinions address issues connected to the Torne River as one of the few unexploited rivers, eagles and other birds of prey, "Struves meridianbåge", proximity to Kemi -Tornio Airport, differences in noise guideline values on the

Swedish and Finnish side, dubious location based on wind conditions, disturbances on TV broadcasts etc.

Demands for risk and impact analysis are made and a large number of the respondent's 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.

The Swedish EPA has also received some statements from the City of Tornio that have been received by the City of Tornio from Swedish stakeholders. The Swedish EPA has not specifically reported these as they have already been registered by the City of Tornio. These opinions are also attached as a consultation opinion from Sweden and must be considered in the continued EIA process.

**The Swedish Environmental Protection Agency's concluding opinion**

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 Miljöskyddskonventionen" or the "Gränsälvöverenskommelsen", 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.

Based on the comments received, Sweden hereby express the wish to participate further in the upcoming process.

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

For the Swedish Environmental Protection Agency

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**Cc**

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