



SWEDISH
ENVIRONMENTAL
PROTECTION
AGENCY

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NV-07046-24

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Swedish reply to consultation in accordance with the Article 10 of the SEA protocol regarding the phased regional land use plan for energy and climate in North Ostrobothnia in Finland, SYKE/2024/1386

Sweden received a notification from the Finnish Environmental Institute to participate in consultation, according to the Article 10 in the Espoo protocol, on the phased regional land use plan for energy and climate in North Ostrobothnia. The notification was received on 23 September 2024. The consultation period in Sweden has been going on from 27 September until 25 October 2024.

Consultation in Sweden

The notification and documents for consultation has been circulated for consideration to Swedish central government agencies, the relevant country administrative board in Norrbotten county, the Swedish municipalities, non-governmental organisations and the public during the period from 27 September until 25 October 2024. The documents have been available on the Swedish EPA website www.naturvardsverket.se/Esbo.

The Swedish EPA is the authority responsible for fulfilling the obligations following from the Espoo Convention and the protocol on strategic environmental assessment (SEA). However, the Swedish EPA has no responsibility to evaluate the consultation comments received and/ or to present an overall Swedish position.

A brief summary of the statements received 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. All statements must be read in full text, see attachments.

Consultations comments received

Comments from central government agencies

The Swedish Transport Administration and the *Swedish Maritime Administration* states that it is of great importance for Sweden that the development of offshore wind power farms consider sea transports direct impact and cumulative effects. The Swedish Transport Administration further states that the impact on sea transports due to the areas planned for offshore wind power have to be clarified especially the impact on transports during winter and the ice conditions. See attached statement for further details. The Swedish Maritime Administration also points out potential problems with ice and that more research investigations regarding off-shore wind farms effect on ice condition, ice-breaking and the effect on shipping routes. They also raise the use with impact on radar and radio system and sea rescue services. More comments and details are presented in the fully enclosed statements.

The Swedish Energy Agency agree that a continuing dialogue between Sweden and Finland regarding the consequences of off-shore wind farms (OWF) is necessary. OWFs are currently planned both in Sweden and Finland and distances between parks have to be considered to reduce negative impact from wind shade, see further details in the enclosed statement.

Swedish Meteorological and Hydrological Institute (SMHI) raise issues regarding cumulative effects of offshore wind farms in the Baltic Sea. They also highlight the need for principles in the international conventions and framework as well as the need for international cooperation to preventing large scale consequences for the entire Baltic Sea area. See further information and details in the attached statement.

Sametingen / Samidiggi states that potential transboundary effects on areas of national interest for Sami interests have to be investigated. The closest area of national interest is Sandskär, Liehittjä sameby where reindeers could possibly be affected by lights from wind farms. This has to be further investigated.

Sametinget also raise that Sami interests should be addressed in an Environmental Assessment and they present an available guide <https://www.sametinget.se/26843>. Further details and more information are given in the enclosed fully statement.

Comments from the county administrative board

The county administrative board in Norrbotten agrees that it is of greatest importance to discuss the total effects on off-shore wind farms in Sweden and Finland. The county administrative board states that there is transboundary impact on areas of national interest for cultural heritage. In the SEA it has to be investigated how the Swedish areas of national interest will be impacted and the consequences have to be investigated and visualised. The county board leave more information such as which islands are most sensitive, i.e. Malören, Sandskär and Rödkallen and that the unbroken horizon is important for the understanding the cultural environment and that studies need to be carried out to ensure that a major visual impact can be avoided. Further information is given in the attached statement.

Comments from municipalities

Haparanda City raise issues regarding flora and fauna and the need of an investigation how the values will be impacted during building, operation and decommissioning. The long-term consequences on migrating fish, as an example, has to be described. See attached statement for more details.

Comments from non governmental organisations

BirdLife Sverige consider that there is likely no transboundary negative impact on birds. However, the coastal living birds have to be considered, and protection zones have to be implemented. Birds can also be affected by the land use for solar panels and consultation with the Finnish BirdLife organisation is recommended

This decision has been made digitally and therefore lacks signatures.

For the Swedish Environmental Protection Agency

Nanna Wikholm
Head of Unit

Åsa Blomster
Point of Contact, Espoo Protocol

Attachments with comments from:

Swedish Energy Agency (Swedish)
The Swedish Transport Administration (Swedish)
Swedish Maritime Administration (Swedish)
Swedish Meteorological and Hydrological Institute (SMHI)
Sametinget, Samidiggi (Swedish)
The County administrative board in Norrbotten (Swedish)
Bird Life Sverige (Swedish)
Haparanda city (Swedish)

Cc:

Ministry for Climate and Enterprise, Bastian Ljunggren and Eleonora Rönström