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ENVIRONMENTAL
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The Swedish reply to the notification pursuant to the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) regarding the planned offshore wind farm “Halla” in the exclusive economic zone of Finland

In August 2022, the Finish Ministry of Environment notified the Swedish Environmental Protection Agency [SEPA] about a planned offshore wind farm [OWF], called “Halla” within the exclusive economic zone of Finland [EEZ] located approximately 40 kilometers from the Swedish coastline. The closest border with the Swedish economic zone [SEZ] is positioned at the southern edge of the project area, about 5 kilometers to the west. The proposed area covers 450 km² with a varying sea depth of 18 to 70 meters. The Finish Ministry of Environment states that the proposed OWF will include 150 wind farms with a height of 270 – 370 meters and a total effect of 11 TWh, as well as a sea cable and potential hydrogen pipelines.

Pursuant to the Protocol on Strategic Environmental Assessment to the Convention on Environmental Impact Assessments in a Transboundary Context [Espoo Convention], a country [originating party] that intends to implement a plan or program likely to have significant transboundary effects on the environment or health of another country [designated party] shall notify the country concerned and, if the designated Party so wishes, enter consultations.

The Swedish Environmental Protection Agency is the responsible authority for submitting and receiving notifications and otherwise fulfilling obligations for the Espoo convention in Sweden, according to the Environmental Assessment Regulation (2017:966). The consultation documents have been referred by SEPA to 20 relevant central government agencies, the County Administrative Boards of Norrbotten and Västerbotten Counties, Kalix and Piteå municipalities, marine- and environmental organizations and Swedish research institutes. The consultation documents have also been available on the SEPA’s website. The consultation period lasted from the August 26, 2022 to October 27, 2022.

SEPA hereby acknowledges having received the notification and would like to inform Finland that Sweden intends to participate in the upcoming Espoo process.

Remarks received during the consultation

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

All statements are enclosed in full to this letter.

BirdLife Sverige describes that the Gulf of Bothnia and Torne River are migratory bird routes. Potential feeding areas in the vicinity of the OWF Halla must be investigated in the EIA since there is a considerable lack of knowledge on bird routes passing through/over the Gulf of Bothnia. BirdLife Sweden argues that, from a biological/ecological perspective, as well as in terms of cumulative impact, the influence of the OWF Halla must be assessed jointly with the impact of Polargrund Offshore on the Swedish side.

Kalix Municipality reports that Sweden will be affected both directly and indirectly by the proposal and emphasizes that an estimation of the noise and impact on the local landscape in different weather conditions, seasons, and times of day should be included in the EIA. To be able to assess these consequences in full, the municipality call for a wide range of visualizations, including videos as well as a corresponding sound recording of a comparable OWF.

The **County Administrative Board of Norrbotten County** state that the overall cumulative impact of the large-scale development of offshore wind farms in the Gulf of Bothnia should be investigated further. The County Administrative Board requests that central authorities in Sweden and Finland deliver a comprehensive assessment for the development plans in the Gulf of Bothnia to enable an assessment of the impact of an individual project in relation to the general large-scale expansion of OWFs in the area.

The County Administrative Board of Norrbotten County lists a range of potential areas of impact, from migratory species and mammals passing through and living the area to the potential risk of invasive alien species [IAS]. Furthermore, the Board points out that the potential noise, vibrations, and possible electromagnetic field caused by the OWF should be described in the EIA.

The County Administrative Board agrees with Kalix Municipality that a description on the transboundary impact of the proposal on the local landscape and cultural environment must be included in the EIA.

The **County Administrative Board of Västerbotten County** sees a need to investigate the environmental impacts that are likely to have an effect Swedish fauna, since they believe it not to be adequately addressed in the documentation provided. The County Administrative Board wishes that the cumulative impact from other activities, be it existing and planned OWFs, along migration corridors through e.g., the Gulf of Bothnia and the Baltic Sea should be described in the EIA.

The comments made by the **Swedish Agency for Marine and Water Management (SwAM)** includes an assessment that the development of OWF Halla might have a negative impact on the fish spawning in area due to sediment drift and lists a number of areas that should be analyzed in the forthcoming EIA.

The *Swedish Maritime Administration* rejects the tender in its current form on the grounds that the proposed OWF spans a large area where adjacent shipping lanes are classified as a national interest for communications and shipping. The Authority stresses that a risk analysis should be made and that the impact on radar and radio systems as well as the operating area for the Swedish sea rescue should be carefully investigated and described in the forthcoming EIA. These analyses should include both the impact of the planned OWF and the cumulative effects that may occur if several plans for OWFs in the Gulf of Bothnia are realized - particularly mentioning the two projects Polargrund and Bothnia Offshore Omega.

Ultimately, the Swedish Maritime Administration points out that the industry in northern Sweden is moving into a phase of anticipated but rapid development with significant increased transport needs for products such as fossil-free steel, being an important part of the green transition. To give the industry in the north reasonable competitive conditions and secure these shipping routes needed, the Swedish Maritime Administration is heavily investing in reinforced infrastructure such as, among other things, a new fleet of icebreakers and a new fairway to Luleå. The Agency would like to inform the Finnish Ministry of Environment on that Swedish and Finnish authorities work closely together, particularly on winter shipping and icebreaking activities, and that the development plans for OWFs in the area is a matter of concern for both countries.

The *Swedish Geological Survey (SGU)* highlights that the EIA should include an analysis of sediment samples to investigate possible nutrients and environmental toxins, that are likely to be released by increased turbidity. Furthermore, SGU considers it relevant to carry out flow simulations in the project area to indicate how far various particles may spread due to such turbidity for it to be possible to assess whether it could reach the SEZ. The Swedish Geological Survey believes that such findings should be used when drafting precautionary measures.

The *Swedish Geotechnical Institute (SGI)* believes that it is not possible to assess the possible transboundary impacts based on the provided documentation. The agency therefore stresses the importance of investigating whether there are environmental geotechnical risks such as sediment transport and possible contaminated sediments around the OWF. SGI also stresses that the impact of the wind farm during the operational phase, for example in terms of leakage of metals to the surrounding surface water and/or sediment, should be investigated and clarified in the EIA.

The *Swedish Pelagic Federation (SPF)* argues that the OWF Halla might have a negative impact on fish stocks due to underwater noise, vibrations, changing currents or electromagnetic fields around the sea cables. Current knowledge about these factors and their impact on the environment and the fish species living in the area are considered insufficient by the SPF. The federation requests that the EIA includes a description of the expected consequences for fish stocks and fisheries during the phases for construction, operation, and decommissioning of Halla with a reference period of at least 10-15 years. Furthermore, the developer should take climate change into account since it might lead to adjusted management of fisheries and changes in historical fishing patterns. Rising temperatures and the division of quota areas into more sub-areas may cause a shift in fishing practices into taking place further north than has been the case so far.

SPF also highlights the importance of that the potential impact of the planned OWF on fish stocks in the Gulf of Bothnia are thoroughly investigated in the EIA and that the cumulative effects, in the short and long term, of Halla and other planned OWF:s in the Gulf of Bothnia, the Bothnian Sea and the Baltic Sea are considered.

The *Swedish Transport Administration* wishes that the route between Sweden and Finland and the marine traffic in the area is considered in forthcoming assessments. Furthermore, the administration emphasizes that the development of OWF in the Baltic Sea needs to take future conditions for shipping into account.

The *Swedish University of Agricultural Sciences (SLU)* deems it unlikely that the OWF Halla will have a negative impact on the marine environment or species living in Swedish water during its construction and active lifecycle, given that necessary precautions are taken to minimize the occurrence of harmful levels of noise.

This decision has been made digitally and therefore lacks signatures

For the Swedish Environmental Protection Agency

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Convention

Cc

Emma Sjöberg at the Swedish Ministry of Environment

Enclosed, statements made in Swedish by:

BirdLife Sverige
Kalix Municipality
The County Administrative Board of Norrbotten County
The County Administrative Board of Västerbotten County
The Swedish Agency for Marine and Water Management (SwAM)
The Swedish Geological Survey (SGU)
The Swedish Geotechnical Institute (SGI)
The Swedish Maritime Administration
The Swedish Pelagic Federation (SPF)
The Swedish Transport Administration
The Swedish University of Agricultural Sciences (SLU)