



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

The Finish Ministry of Environment notified the Swedish Environmental Protection Agency [SEPA] on the 20th of October about the planned offshore wind farm [OWF], *Reimari* within the exclusive economic zone of Finland [EEZ] located approximately 30 kilometers from Jakobstad, Finland. The Finish Ministry of Environment states that the proposed OWF will include approx. 120 wind farms with a height of 390 meters and a total effect of 3,6 GW, spanning a project area of 40 500 hectare. The project area is located about 40 kilometers from the Swedish coastline and 5 kilometers west of the Swedish EEZ.

Consultation in Sweden

The Swedish Environmental Protection Agency is the responsible authority for submitting and receiving notifications and otherwise fulfilling obligations for environmental impact assessments in a transboundary context [Espoo Convention] in Sweden, according to the Environmental Assessment Regulation (2017:966). The notification and the consultation documents have been circulated for consideration by SEPA to 20 relevant central government agencies, the County Administrative Boards of Norrbotten and Västerbotten Counties, Nordmaling, Piteå, Skellefteå, Robertsfors and Umeå municipalities, marine- and environmental organizations as well as effected interest organizations. The consultation period lasted from the 20th of October until December 12th, 2022.

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

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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.

Nordmaling Municipality does not, as an individual municipality, wish to be included in the further Espoo-process regarding OWF *Reimari* unless it will be visible from the Swedish mainland. If that is the case, the municipality requests that the potential health effects and impact on the seabed, fauna, aviation and maritime transport as well as the influence on local fisheries to be included in the environmental impact assessment [EIA].

BirdLife Sverige describes that the sea corridor between *Jakobstad* and *Holmöarna* is the narrowest part of the *Gulf of Bothnia*, through which large numbers of birds pass through every spring and autumn. Particularly for birds that rely heavily on thermals during their migration, the passage represents a clear "bottleneck" and concentration of birds, which must be considered when assessing the environmental impact of the project.

The association *Sveriges Fiskares Producentorganisation (SFPO)* notes that there is an overlap between the project area for OWF *Laine* and OWF *Reimari*. In the light of the large expansion of wind power in the sea area in question, SFPO stresses the importance of carefully considering the cumulative effects in the EIA. SFPO also comments that OWF *Reimari* might have a possible negative impact on the salmon and herring in the area, which should be investigated and included in the EIA for the project.

The *County Administrative Board of Norrbotten County* refers to its previous statement regarding OWF *Laine*. In that statement, the County Administrative Board states that they do not wish to participate further in these specific processes but that it is important to consider the cumulative impact of the multiple proposals currently considered that could lead to an establishment of approximately 7 or more OWFs in the *Gulf of Bothnia*, both within the Swedish- and Finnish EEZ.

The County Administrative Board therefore requests that the SEPA and the Swedish Agency for Marine and Water Management (SwAM), together with its Finnish counterparts, jointly delivers an assessment that makes it possible to consider the extent to which large scale development of OWFs in the area is possible.

The *County Administrative Board of Västerbotten County* argues that the cross-border impact falls short in the related material. The County Administrative Board requests that the potential impact on Swedish fauna and the proposed visual effect on cultural sites that are classified as being of national interest in Sweden are further investigated and described in the coming EIA.

Furthermore, the County Administrative Board requests that the developer should include a description for the MSA area surrounding *Umeå* Airport as well as an assessment on how to handle the impact of ice loads at sea, that at times can be significant in the project area.

The ***Swedish Agency for Marine and Water Management (SwAM)*** considers it to be likely that fishes and seals might be negatively impacted due to sediment dispersion and noise. SwAM concludes with noting several elements that should be included in the EIA and that are to be considered in full.

The ***Swedish Maritime Administration*** considers that the OWF will have an impact on Swedish shipping lanes in the operational area which will increase the associated risks. The Swedish Maritime Administration requests that several issues are investigated and included in the EIA, which are described in full in the administration's statement that is attached to this letter.

The ***Swedish Geotechnical Institute (SGI)*** is unable to estimate the potential transboundary environmental impact based on the available documentation and therefore considers it appropriate for Sweden to participate in the continued process. Any environmental geotechnical hazards such as sediment transport should be assessed at an early stage. Furthermore, SGI argues that the environmental impact during the operational phase should be assessed and described in the EIA.

The ***Swedish Meteorological and Hydrological Institute (SMHI)*** stresses the need to consider the cumulative impact of the multiple OWF that are being planned in the *Gulf of Bothnia*, and more specifically within the so called northern *Kvarken*. The consultation document gives some examples of transboundary impacts. SMHI would like to emphasize that OWFs also change the surface layer mix which, in turn, could affect the biological productivity close to the sea surface and should thus be included in the impending EIA.

The ***Swedish Pelagic Federation (SPF)*** argues that the OWF has the potential to negatively impact fish stocks that are fished by Swedish fishermen due to underwater noise, vibrations, changing currents or electromagnetic fields around the accompanying cables. Current knowledge about these factors and their impact on the environment and the fish species living there is incomplete and should be developed further. The EIA should describe the expected effects on fish stocks and fisheries during the construction, operation, and decommissioning phases. Furthermore, it should be considered that climate change and adjusted fisheries management may lead to changes in historical fishing patterns in the future. Rising temperatures and the division of quota areas into more sub-areas may lead to a shift of fishing further north than what has been the case so far.

The *Swedish Transport Administration* highlights the importance of the shared shipping lanes between Sweden and Finland and the need for them to be considered in the forthcoming process. Furthermore, the agency points out that the affected area for both OWF *Reimari* and *Laine* are within the MSA vicinity of *Umeå* Airport.

The *Swedish University of Agricultural Sciences (SLU)* assesses that the transboundary environmental impact is low but that there may be reasons for Sweden to continue participating in the environmental impact assessment considering the area's location in northern *Kvarken*, being an ecologically uniform area shared by Sweden and Finland.

The species groups that need to be considered in the EIA are fish, birds, and seals. SLU notes that there is currently a lack of direct empirical studies on how OWFs may affect species in the *Gulf of Bothnia* and sees a need to fill this knowledge gap on a general level to increase the knowledge base on the environmental effects of offshore wind power. Results from such studies, if carried out in the OWF in question, should have transboundary relevance.

Umeå Municipality notes that there is an overlap between the project area for OWF *Laine* and OWF *Reimari*. The municipality requests that the potential impact on bats and migrating birds in the area are described in the EIA.

Umeå Municipality also requires that SEPA, through the Swedish Maritime Administration and SwAM, ensures that OWF *Reimari* will not negatively affect the interests expressed in the Marine Plan for the *Gulf of Bothnia* and more specifically, the shipping lanes in the direct vicinity of the project area. The plans for a future fixed link across the quay should be considered in the sense that it could create a potential common innovative platform where benefits can be achieved by, for example, interconnecting technical infrastructure such as electricity and gas pipelines linked to the area of operations.

This decision has been made digitally and therefore lacks signatures.

For the Swedish Environmental Protection Agency

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Convention

Cc

Astrid Öfverholm and Sandra Jalalian at the Swedish Ministry of Environment

Enclosed, statements made in Swedish by:

BirdLife Sweden
Nordmaling Municipality
Sveriges Fiskares Producentorganisation (SFPO)
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 Geotechnical Institute (SGI)
The Swedish Maritime Administration
The Swedish Meteorological and Hydrological Institute (SMHI)
The Swedish Pelagic Federation (SPF)
The Swedish Transport Administration
The Swedish University of Agricultural Sciences (SLU)
Umeå Municipality

