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Reference: Notification letter by Ministry of Environment of the Republic of Lithuania in accordance with article 3 of the Convention on Environmental Impact Assessment regarding installation and operation of an offshore wind farm of up to 700 mw installed capacity in Lithuania's marine territory

## **Finland's answer to the notification regarding a planned offshore wind farm in Lithuania's marine territory in accordance with the Espoo Convention**

Finland has received a notification on 9 December 2021 from Lithuania concerning the environmental impact assessment (EIA) of an offshore wind farm within Lithuania's EEZ. The notification was made in accordance with Article 3 of the Espoo Convention. The notification included a summary of the EIA programme. The original deadline for Finland's answer was postponed until 28 February in order to translate the summary into Finnish and Swedish to enable the public hearing.

Finland has given the public and the authorities the possibility to comment on the summary of the EIA programme during 31.1.-21.2.2022. Comments were received from The Finnish Heritage Agency, The Finnish Wildlife Agency, The Finnish Association for Nature Conservation and BirdLife Finland. Additionally the Ministry of Agriculture and Forestry stated that it had no comments regarding Finland's participation in the EIA. A summary of the comments received is provided below. The statements are enclosed to this letter and should be considered in their entirety.

**The Finnish Wildlife Agency** is concerned about the potential impacts of the project on migratory waterbirds. The greatest risks may arise if wind farms are built in shallow marine areas which are important foraging areas for seabirds. The problem is particularly acute in winter when the Baltic Sea's wintering habitats are scarce and birds are concentrated in certain key areas. In order to minimise disturbance to sea birds, wind turbines should be set up in areas that are more than 35 meters deep. This way, the shallow areas used by seabirds for foraging would remain intact and suitable habitat for avian fauna. It must be possible to invest in the production of renewable energy in a manner which does not compromise biodiversity and the objectives of protecting EU species or opportunities for their sustainable use.



The planning must take into account the AEWA (African Eurasian Migratory Waterbird Agreement) International Single Species Action Plans for migratory waterbirds, especially for the seaducks Long-tailed Duck (*Clangula hyemalis*) and Velvet Scoter (*Melanitta fusca*). The Agency makes also reference to two guidelines adopted under the African Eurasian Migratory Waterbird Agreement which are pertinent in this regard. Links to the Action plans and AEWA guidelines are provided in the answer of The Finnish Wildlife Agency (enclosed).

**The Finnish Association for Nature Conservation** supports the participation of Finland in the EIA of the project. The area hosts Finnish migratory birds and the area may also be important for the migration of bats.

**BirdLife Finland** encourages Finland to participate in the EIA procedure. Not enough data is available to exclude the importance of the Lithuanian marine areas for many migratory birds nesting in Finland (grebes, divers, other waterbirds and gull species). On the other hand, it is well-documented that razorbills belonging to the Finnish population use the Lithuanian marine areas. It is also clear that arctic birds migrating through Finland to nest in Russia also use these habitats as their migration routes pass through the marine areas of Lithuania. These birds are also of particular importance to Finland.

Bordering the wind farm with a Natura 2000 area, that is important for roosting and foraging birds, raises concerns. Studies show that many seabird species avoid offshore wind turbines at distances up to 10 kilometers. Therefore, the project could have unexpected impacts to the Natura 2000 area.

It is particularly important to assess the possible impacts of the project on the whole migration route taking into account also other projects along the migratory pathways. The cumulative impact of several projects may have population level effects.

**The Finnish Heritage Agency** does not see the need to participate in the Lithuanian EIA on the basis of underwater cultural heritage.

Based on the received comments, and reflecting its own views, the Ministry of the Environment states that Finland will participate in the EIA of the project. The planning of offshore wind farms is very active within the Baltic Sea at the moment. It is important to find ways to mitigate cumulative impacts on migratory birds in each wind farm planning process. Many factors influence the status of seabirds and their habitats in the Baltic Sea; the cumulative impacts of these factors may prove fatal. All contributing factors must be known and their impacts, including far-reaching ones, assessed, in order to ensure that the decision on the implementation of the project is based on firm knowledge of its impacts and on the best possible solution.



In particular, Finland wishes to stress the need to take into account relevant international obligations, decisions and guidance adopted under AEWA, HELCOM, the Convention on Migratory Species (CMS) etc. with respect to windfarm development and the need to restore and maintain key habitats and species in a favourable conservation status.

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**For information**

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