ESTLINK3 SUBMARINE CABLE SUPERFICIES LICENSE

UPDATED ENVIRONMENTAL IMPACT ASSESSMENT PROGRAMME

English Summary

Item	Information
Work number	24000114
Client	Elering AS
Consultant	Skepast&Puhkim OÜ
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This document is an English-language shortened summary of the EstLink3 updated EIA Programme. The structure follows the original report and all main themes are retained. Terminology has been harmonised for EIA, marine ecology, Natura 2000, cable engineering and permitting terminology.

Contents

Abbreviations and terminology

Abbreviation / term	English use in this summary
EIA	Environmental Impact Assessment.
SEA	Strategic Environmental Assessment.
TTJA	Consumer Protection and Technical Regulatory Authority; the competent authority and decision-maker.
NDSP	National designated spatial plan for the onshore part of EstLink3 project.
Natura 2000	EU network of protected areas under the Habitats and Birds Directives.
IBA	Important Bird Area.
UXO	Unexploded ordnance.
HDD	Horizontal directional drilling.
MTBM	Microtunnel boring machine.
ROV	Remotely operated underwater vehicle.
CPT	Cone penetration test.
DAS	Distributed Acoustic Sensing, a fibre-optic seismic monitoring method.

Introduction

Elering AS applied for a superficies license for EstLink3, a new electricity interconnector between Estonia and Finland. The application was submitted to TTJA on 02.02.2024 and later supplemented. TTJA initiated the superficies license procedure together with an EIA on 25.07.2024. The EIA is mandatory because the project may cause significant environmental effects and the route crosses the Nõva-Osmussaare Natura 2000 area for approximately 11 km.

The EIA object is the Estonian offshore section of the EstLink3 submarine cable connection: up to three submarine power cables and one fibre-optic communication cable. The total connection length is approximately 130 km, including approximately 53 km in Estonian waters. The planned service life is 40-60 years, and Elering applies for the superficies license for 50 years.

The programme was updated after public disclosure in spring 2025, stakeholder comments and additional cooperation with the Geological Survey of Estonia. The cable corridor was shifted and widened, especially near Osmussaar, to avoid complex seabed relief and to improve technical feasibility, reliability and predictability of environmental effects (Figure 1).

1. EIA parties

1.1. Expert team that prepared the EIA Programme

The EIA Programme was prepared by Skepast&Puhkim OÜ. The leading EIA expert is Veronika Verš (EIA license No KMH0160). The programme team included specialists in marine and terrestrial biota, fish and fisheries, groundwater, marine water quality, noise, vibration, electromagnetic field, climate change, GIS, seismology and seabed geology (prepared by Geological Survey of Estonia).

1.2. Expert team needed for the EIA Report

The EIA Report will be prepared after the studies required in the programme have been completed. At programme stage the future study providers and the EIA report consultant are not yet known. The developer will select the study teams and EIA report expert group in the next stage.

2. Description of the proposed activity

2.1. Objective and need

The purpose of EstLink3 is to create up to 700 MW of additional transmission capacity between Estonia and Finland, in addition to EstLink1 and EstLink2. The project supports security of electricity supply, market integration and decarbonisation by enabling additional renewable electricity produced in Northern Finland to reach the Baltic region.

The project also requires strengthening the existing Estonian grid, including new and reconstructed 330 kV connections and substations. These onshore works are addressed in the separate EstLink3 onshore national designated spatial plan.

2.2. Location

The Estonian landfall is planned near Aulepa on the coast of Hara Bay in Lääne-Nigula municipality. The current corridor is approximately 3.5 km wide at the landfall to align with the area of onshore national designated spatial plan of EstLink3 project, which will designate the optimal location for onshore infrastructure (onshore cable, substations and 330 kV powerlines). The exact location of submarine cables within the investigation corridor will be determined based on the results of indicated surveys and EIA.

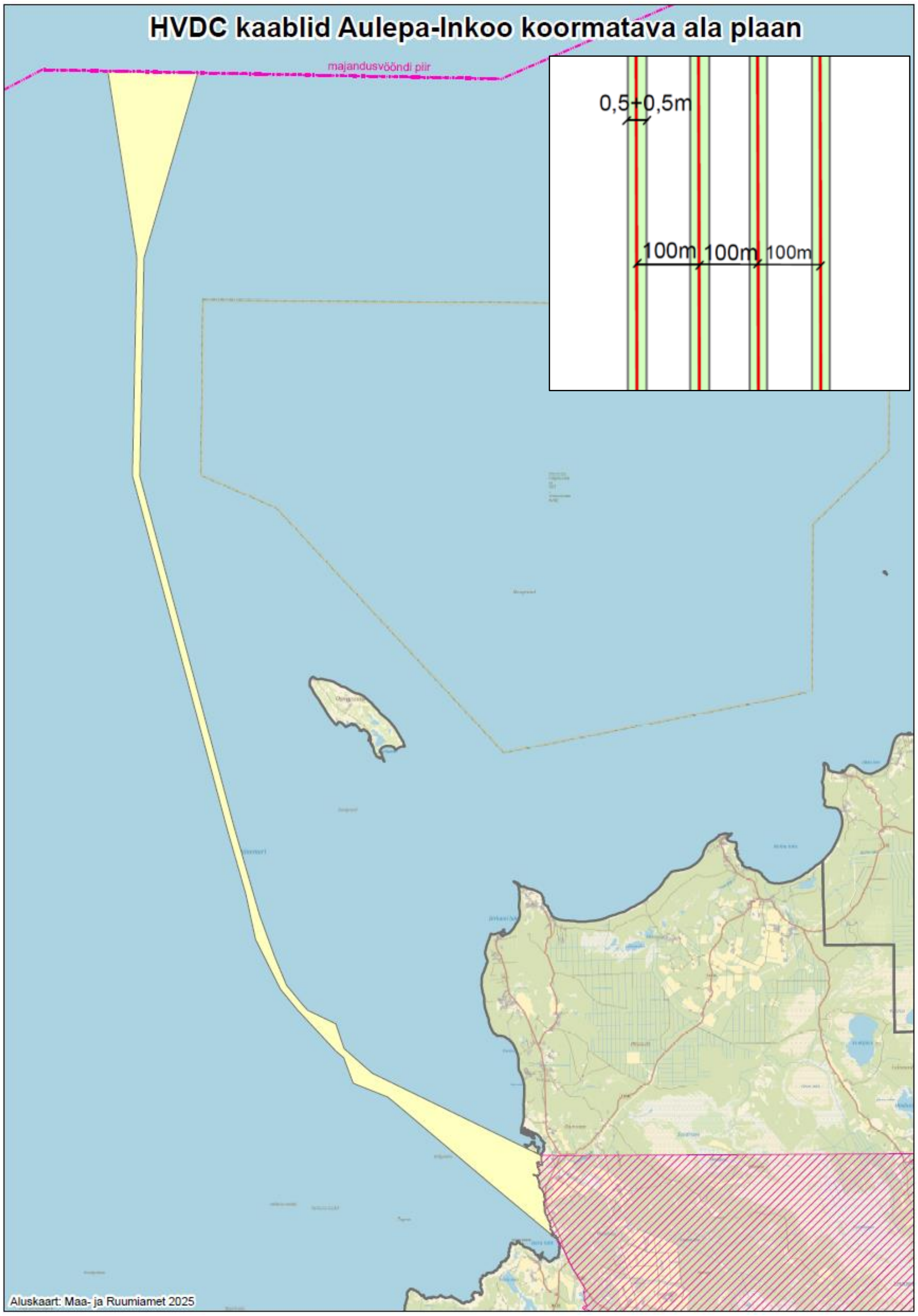

Figure 1. EstLink3 submarine cable corridor (marked with yellow) in Estonian waters. The onshore area of the EstLink3 project (not subject to this EIA) is marked with red hatching. EEZ border is marked with a dashed pink line.

2.3. Technical characteristics of the submarine cables

Table 1. Technical characteristics of EstLink3 submarine cables

Parameter	Summary
Transmission capacity	Up to 700 MW
Voltage	HVDC, up to 525 kV
Total cable length	Approx. 130 km, including approx. 53 km in Estonian waters
Cable components	Up to three submarine power cables and one fibre-optic communication cable
Burial depth	Up to 3 m into seabed sediments; at least 3 m where protection from external factors is required
Construction corridor	Temporary construction area generally 3-15 m from cable centreline, depending on location
Protection zone	100 m on both sides of the outermost cable (see Figure 1)

2.3.2. Resistive heat

During operation, cables may release resistive heat. The EIA must assess potential effects on water quality and benthic biota based on cable properties, burial depth and seabed conditions. Additional modelling may be required if the technical design or seabed conditions indicate relevant risk.

2.4. Construction stages of the submarine cable

Table 2. Construction stages of EstLink3 submarine cables

Stage	Short description
Preliminary design	Identify route options, constraints, technology alternatives and data gaps.
Seabed construction surveys	Geological, geotechnical and magnetometry surveys to determine exact cable placement and UXO risk.
Detailed design and installation design	Prepare technical design, construction procurement basis and installation-specific methodology.
Seabed preparation	Clear hazardous objects, prepare infrastructure crossings and, where needed, level or backfill the seabed.
Trenching in coastal waters	Use open trenching or trenchless methods depending on depth, geology and environmental constraints.
Cable installation	Install from cable-laying vessels; possible methods include ploughing, jetting or other burial techniques.
Post-installation works	Backfill shallow sections, add protection where needed, survey the seabed and prepare as-built documentation.
End-of-life stage	The cable may be left in place if it does not pose environmental or navigation risks, or removed if technically and environmentally justified.

2.4.5. Trenching and shore crossing

In shallow water, both open and closed methods may be used. Open trenching involves excavating a trench, placing the cable and backfilling with the same material. Closed methods include horizontal directional drilling or microtunnelling. Selection of the method depends on geology, environmental constraints and technical feasibility.

2.4.8. Volume of seabed works

The exact seabed work volume depends on the number of cables, seabed material, selected installation technology and number of crossings with existing infrastructure. Suspended sediment will be modelled for trenching, ploughing and jetting, or for a worst-case scenario if appropriate. Earlier cable projects indicate that dredging may be below 10,000 m^3 in many cases, but the superficies license application assumes backfill above 10,000 m^3 due to uncertainty and crossing works with existing submarine cables and pipelines.

2.5. Alternatives considered in the EIA

The EIA will analyse open and closed construction methods where appropriate, and will assess the route within a sufficiently wide corridor so that the final cable alignment can be optimized based on results of indicated surveys and

Natura assessment, including seabed conditions, safety and technical feasibility. The proposed impacts will be described comparing against the baseline (0-alternative), meaning the situation where EstLink3 submarine cables are not built.

3. Related strategic planning documents

The project is linked to strategic energy, climate and spatial planning documents at EU, national, maritime and municipal level. In general, EstLink3 supports security of supply, electricity market integration and the transition to a cleaner energy system.

Table 3. Related strategic planning documents and frameworks

Document / framework	Relevance for EstLink3 project
EstLink3 onshore NDSP	Plans the onshore grid, cable, converter station and 330 kV connections. The submarine cable landfall must be coordinated with this process.
EU climate and energy framework	Supports climate neutrality by 2050, greenhouse gas reductions and renewable energy integration.
Energy Development Plan until 2035	Identifies EstLink3 project as part of the transition towards a clean, secure and affordable energy system.
Estonian transmission network development plan 2025-2034	Recognises EstLink3 project and related grid reinforcements as major investments.
National Energy and Climate Plan	Supports cross-border interconnection and energy security objectives.
Climate adaptation and climate policy principles	Require climate resilience, security of supply and resource-efficient energy infrastructure.
National spatial plans “Estonia 2030+” and “Estonia 2050”	Support rational, sustainable energy infrastructure and connections with neighbouring energy networks.
Estonian Maritime Spatial Plan	Allows cables and pipelines subject to route-specific permitting and impact assessment; requires protection against ice, anchors and biodiversity impacts.
Lääne-Nigula comprehensive plan	The landfall area is situated in a valuable landscape area and green network corridor; terrestrial impacts are handled in the SEA of onshore NDSP.

4. Potentially affected environment and likely significant environmental impacts

4.1. Settlement

The landfall is located in Riguldi village, Lääne-Nigula municipality. Local effects may occur mainly during construction of submarine cables, including construction traffic, noise and temporary disturbance near the coast. Other onshore effects from land cables, converter station and overhead lines are addressed in the onshore NDSP/SEA.

4.2. Ports and fairways

Nearby ports include Hara, Dirhami and Osmussaar. The corridor intersects local and international fairways. The EIA must assess navigation safety, construction-stage vessel traffic and operational risks such as anchor damage. Cable burial and chart marking are key mitigation measures.

4.3. Other infrastructure and activities

Relevant nearby activities include a naval training area, Aulepa wind farm and Telia Eesti AS optical submarine cable. Crossings with existing submarine infrastructure will be designed with infrastructure owners and may use rock cover, concrete mattresses or other approved technical solutions. UXO and hazardous object risks must be addressed before construction.

4.4. Valuable landscape and green network

The landfall area overlaps the Riguldi coastal juniper landscape and a green network corridor. The submarine cable EIA addresses the marine-terrestrial contact zone, while wider terrestrial landscape and green network issues are assessed in the SEA of onshore NDSP.

4.5. Seabed geology

The Osmussaar area is influenced by the Baltic Klint, steep bedrock relief, glacial valleys and erosional remnants. The original route was considered less favourable because it approached the klint headland and transition zone where seabed relief is complex. The updated route shifts westwards through a klint bay centre and towards the Ordovician plateau, where the seabed is expected to be smoother and technically safer. Detailed seismo-acoustic and geotechnical surveys are required.

4.6. Seismic setting

Estonia is generally a low-seismicity area, but the Hiiumaa-Vormsi-Osmussaar-Haapsalu region is the most seismically active part of Estonia. The strongest known Estonian earthquake, magnitude 4.5, occurred near Osmussaar in 1976. The EIA should consider seismic hazard and the potential use of Distributed Acoustic Sensing (DAS) in the fibre-optic cable for monitoring natural and human-induced events.

4.7. Current climate and climate change

Climate change in the area is reflected in rising temperatures, changes in precipitation, milder ice conditions and potentially more stormy conditions. Cable construction planning must consider wind, waves, ice and seasonal constraints. The cable itself does not affect wind or climate, but climate resilience and sea-level rise must be considered in the project design.

4.8. Sea levels and flood areas

Sea-level rise and storm surges are relevant mainly at the landfall. The EIA must assess coastal flood risk, erosion risk and the implications for the cable landfall and construction method.

4.9. Marine water quality

The EIA must assess impacts on the Hiiu madal coastal water body and the wider Baltic Sea environment. Key issues include suspended sediment, sediment-bound nutrients and hazardous substances, possible release of pollutants from seabed sediments, and operational heat effects from cables. Sediment and water quality studies must follow HELCOM and Estonian requirements.

4.10. Groundwater and registered wells

Groundwater relevance is mainly linked to the coastal landfall and possible trenchless or open construction methods. Any risk to groundwater or nearby wells must be considered in connection with construction technology and local geology in the SEA of onshore NDSP.

4.11. Fish

The fish population in the Gulf of Finland is diverse. The main fish species in the area are herring (*Clupea harengus membras*), sprat (*Sprattus sprattus*), pike (*Esox lucius*), pike perch (*Sander lucioperca*) and garfish (*Belone belone*). According to the latest monitoring data, the status of the stocks of herring (*Clupea harengus membras*), pike (*Esox lucius*), pike perch (*Sander lucioperca*) and perch (*Perca fluviatilis*) and their seasonal movements in coastal areas continue to be important in the Gulf of Finland.

The main fish species in the Hara Bay are perch (*Perca fluviatilis*), pike (*Esox lucius*), crucian carp (*Carassius carassius*), flounder (*Platichtys flesus*), roach (*Rutilus rutilus*), ling (*Lota lota*) and whitefish (*Coregonus lavaretus*).

The EIA must assess fish species composition, spawning areas, migration routes and potential effects from suspended sediment, underwater noise and electromagnetic fields. The fish survey is needed to specify the relevant species, spawning areas and migration routes. The impact assessment should also take account the results of seabed habitat survey and water quality modelling.

4.12. Fishing

The EstLink3 submarine cable route falls within the International Council for the Exploration of the Sea (ICES) subdivision 32, where both trawling and commercial fishing take place. The most active trawling is in the area between Osmussaare and Pakri islands (Figure 2). Trawling takes place in accordance with the requirements of the legislation in sea areas deeper than 20 m.

The most important fish species in ICES subdivision 32 are herring and sprat. Herring and sprat are caught in the Baltic Sea on a quota basis. For example, in 2023, 14,509 tonnes of sprat and 4,651 tonnes of herring were caught in trawl fishing. In 2025, the corresponding catch volumes were 11,588 tonnes and 3,448 tonnes. Compared to 2023, the catch of sprat in 2025 has decreased by 2,921 tonnes, or approximately 20%, and the catch of herring by 1,203 tonnes, or approximately 26%.

Based on the Estonian Fishing Regulations, small fishing squares have been established in Estonian territorial waters, based on which coastal fishing data is reported. The planned EstLink3 submarine cable route corridor passes through small fishing squares 169 and 168 bordering the coast (Figure 2).

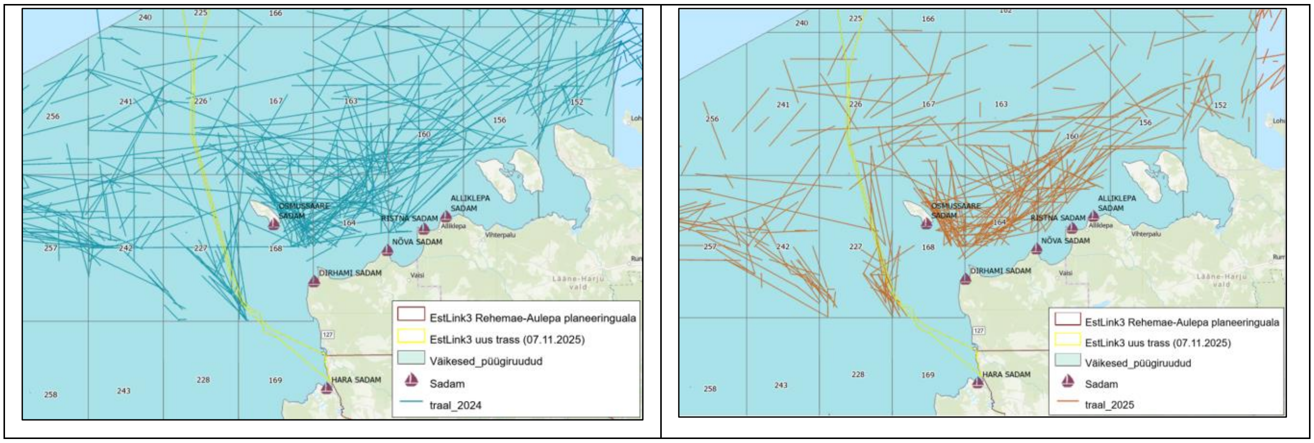

Figure 2. Trawling areas in 2024 (left) and 2025 (right) near EstLink3 project area

According to the Ministry of Regional Affairs and Agriculture the fishing areas in question fall within the ICES 47H3 statistical square, where the total trawl catch in 2025 was approximately 8 million kg and in 2024 approximately 6.5 million kg of fish. Although it is possible to provide approximate estimates of the distribution of catch volumes across smaller fishing squares, it must be taken into account that several fishing squares are often passed through during trawl fishing, and therefore the distribution of data on a smaller spatial scale is not accurate. For example, in 2025, it is estimated that in fishing square 227 (Figure 2) approximately 1.5 million kg of fish were caught, in fishing square 168 approximately 1.7 million kg and in fishing square 164 approximately 2 million kg of fish, which together constitute approximately 60% of the total catch of the respective statistical square. However, it must be taken into account that the catch volume of the entire statistical square constitutes approximately 30% of the total trawl catch in the high seas, which is why the areas under consideration have a significant fishing effort in a broader context. Based on the data for 2024, the distribution of catch volumes across smaller fishing squares remains in the same order of magnitude.

The project may affect professional fishing through temporary construction disturbance, possible effects on fish resources and operational restrictions in the cable protection zone. A fishing study and technical analysis is required to clarify which fishing activities may pose a risk to cable infrastructure and which restrictions are justified.

4.13. Seals

The project area is a relevant habitat for both seal species. Grey seals use the marine areas of the EstLink3 cable corridor for feeding and migration; in colder winters, calving may also occur in the area on sea ice. Several telemetry studies have shown the presence of ringed seals throughout the route corridor in Estonian territorial waters. Ringed seals use the sea areas for foraging and migration, and in harsher winters, seals can also calve on sea ice. Potential effects on seals may arise from construction disturbance, underwater noise, UXO clearance, vessel traffic and indirect effects through fish resources. The assessment must rely on seal ecology expertise and relevant telemetry data.

4.14. Birds

The proposed EstLink 3 cable route passes through an area between the mainland and Osmussaar that is highly important for birds and is located on the East European flyway of Arctic waterbirds. The relatively narrow Gulf of Finland lies on the south-west–north-east oriented East Atlantic Flyway, which is used by a large proportion of the waterbirds of the tundra and taiga zones of north-western Europe and northern Russia.

Their autumn migration largely follows the northern coast of Estonia, with bird concentrations becoming increasingly intense in the western part of the Gulf of Finland. For many species, the 7 km-wide strait between Osmussaar and Põõsaspea serves as a migration bottleneck. It is estimated that at least 20% of the waterbirds migrating along the Baltic Sea pass between Põõsaspea Cape and Osmussaar.

The marine habitats of the Nõva-Osmussaare limited-conservation area located in the region and the EstLink3 cable route area are suitable for many bird species, providing seabirds with good feeding and resting opportunities. The most numerous passage migrants are the long-tailed duck (*Clangula hyemalis*), common scoter (*Melanitta nigra*), velvet scoter (*Melanitta fusca*), black-throated diver (*Gavia arctica*), red-throated diver (*Gavia stellata*), barnacle goose

(*Branta leucopsis*), brent goose (*Branta bernicla*), common goldeneye (*Bucephala clangula*), goosander (*Mergus merganser*), dunlin (*Calidris alpina*), Eurasian wigeon (*Mareca penelope*) and greater scaup (*Aythya marila*). The peak migration period is from early April to the end of May and, in autumn, from mid-September to the end of October. Offshore shallows in particular serve as suitable stopover sites for Arctic waterbirds; these same shallows are also often important moulting and wintering areas.

The coastal area of the Nõva-Osmussaar limited-conservation area, through which the first section of the cable route passes, is an important stopover and feeding site, particularly for passerines, waders and raptors.

Based on the analysis of bird stopover areas (EOÜ, 2019) and the results of the spring 2024 flight survey, the cable corridor area is an important aggregation area for the long-tailed duck, common scoter, velvet scoter, greater scaup and European herring gull.

Cable installation may disturb seabirds, displace birds from staging and feeding areas, and indirectly affect feeding conditions through suspended sediment. The EIA must consider Nõva-Osmussaar bird area, Important Bird Areas, migration and wintering birds, and available offshore bird survey data.

4.15. Protected species and Natura habitat types

The landfall and marine corridor interact with many protected natural values. The EIA must assess possible loss or disturbance of protected species habitats and Natura habitat types, especially where open trenching or other intrusive methods may affect the marine and/or marine-terrestrial contact zone.

4.16. Benthic biota and habitats

The corridor includes marine habitat types such as sandbanks (1110) and reefs (1170), including within the Nõva-Osmussaar Natura area. The EIA must assess direct seabed disturbance, sediment deposition, habitat loss, habitat recovery, non-native species risk and compliance with EU marine habitat loss and disturbance thresholds.

4.17. Protected areas

Relevant protected areas include the Nõva-Osmussaar nature and bird areas and related national protected areas. The EIA must assess whether project activities could affect protected area objectives and whether mitigation measures or route optimisation is needed.

4.18. Important Bird Areas

The Põhjamadalate IBA, established for long-tailed duck habitat, lies close to the corridor. Cable installation impacts on IBA objectives and bird species must be assessed in the EIA Report.

4.19. Natura preliminary assessment

Natura assessment focuses only on effects on Natura conservation objectives. The updated programme identifies potential risks for the Nõva-Osmussaar Natura areas, including seabed habitats, birds and species/habitat integrity. Natura appropriate assessment will be required in the EIA Report based on the results of the indicated surveys and technical design.

4.20. Underwater cultural heritage and potential archaeological objects

The EIA must consider underwater cultural heritage and archaeological objects. High-resolution sonar survey, documentation and possible route adjustment are required to avoid significant adverse effects. Known or newly identified valuable objects should be avoided and monitored where necessary. The minimum protection zone for underwater cultural heritage is 300 m. This must be taken account then determine the exact locations for the submarine cables.

4.21. Noise, vibration and electromagnetic field

Construction may cause above-water noise near the landfall, underwater noise from vessel and installation works, vibration and, in the case of UXO clearance, impulsive underwater noise. During operation, electromagnetic fields and resistive heat are relevant environmental factors, especially for fish and benthic biota. The above-mentioned aspects will be analysed and described in the EIA report.

4.22. Possible transboundary effects

Considering that the project involves planning an additional electricity interconnection between Estonia and Finland, it is, by its very nature, a transboundary EIA procedure. This means that, among other things, the requirements laid down in international agreements regarding the exchange of information and the involvement of authorities and the public must be taken into account.

In carrying out the EIA, it must be analysed whether implementation of the proposed activity in Estonian waters could result in significant adverse impacts extending to the territory of the Republic of Finland, for example on vessel traffic, fish fauna, seals or migratory birds. The implementation of the Finnish part of the project, together with an environmental impact assessment, is also necessary for the implementation of the EstLink 3 project. The best outcome can be achieved if the necessary studies and impact assessments are carried out simultaneously in both countries, making it possible to analyse the potential impacts of the overall EstLink 3 project solution on the water quality, biota and other environmental aspects of the Gulf of Finland.

5. Assessment methodology and required studies

5.1. Assessment methodology

The EIA will follow Estonian and EU EIA and other relevant legislation, primarily Environmental Impact Assessment and Environmental Management System Act, and relevant Ministry of Climate guidance. It will compare the future project situation with the baseline and will use both qualitative and quantitative methods: literature review, previous studies, new field studies, expert assessments, consultations with authorities and stakeholders, and modelling where needed.

The assessment will identify direct, indirect, cumulative and transboundary impacts, their duration, extent, reversibility and significance, and will propose avoidance, mitigation and monitoring measures.

5.2. Impact sources, impact area and affected environmental components

Table 4. Impact sources, impact area and likely affected environmental elements

Aspect	Summary
Main impact sources	Suspended sediment, vessel traffic, construction noise, coastal landfall works, operational heat, electromagnetic field and restrictions in the cable protection zone.
Impact area	Wider than the cable corridor and defined separately for each receptor; exact extent depends especially on sediment plume modelling and species/habitat sensitivity.
Affected components	Water quality, benthic habitats and biota, fish, seals, birds, Natura areas, fisheries, shipping lanes and marine traffic, navigation, cultural heritage, local residents, climate resilience and infrastructure safety.

5.3. Required studies and expert assessments

Table 5. Required surveys and expert assessments

Study / expert field	Purpose in the EIA
UXO and hazardous objects	Assess and survey unexploded ordnance and dangerous objects; coordinate with defence authorities and navies.
Underwater archaeology	High-resolution sonar, documentation and assessment of cultural heritage objects.
Seismology	Background study of historical and instrumental seismic observations and seismic hazard.
Seabed geology	Seismo-acoustic, geotechnical and sediment studies, including contaminants and suitability for cable burial.
Water quality	Field measurements, sediment plume modelling, oil spill modelling, nutrients, oxygen, salinity and stratification effects.
Benthic biota and habitats	Field surveys of flora, fauna and habitats; assess habitat loss/disturbance and recovery.
Underwater noise	Assess ambient and construction-related noise, including potential UXO clearance noise.
Fish and fisheries	Survey fish, spawning areas and migration; assess fisheries impacts and cable protection zone restrictions.
Seals and birds	Expert assessments based on related studies, telemetry and bird survey data.
Navigation and infrastructure	Assess vessel traffic, maritime safety, crossings and security aspects.
Human health and well-being	Assess temporary construction disturbance near the landfall.
Protected natural objects and Natura areas	Assess protected species, habitats and Natura 2000 impacts, including appropriate assessment.

Climate change	Assess sea-level rise, flooding, erosion, adaptation and greenhouse gas aspects for a typical year.

6. Overview of the EIA procedure

6.1. EIA participants

The programme includes the list of authorities and stakeholders to be involved. Key bodies include TTJA, Environmental Board, Ministry of Climate, Ministry of Regional Affairs and Agriculture, Ministry of Economic Affairs and Communications, Ministry of Defence, Transport Administration, Heritage Board, Health Board, Rescue Board, Police and Border Guard Board, Defence Forces, Environmental Agency, Land and Spatial Development Board, and Lääne-Nigula Municipality.

6.2. Indicative EIA schedule

Table 6. Indicative EIA procedure schedule

Period / date	Milestone
25.07.2024	EIA and superficies license procedure initiated by TTJA.
03.09.2024	Finland was notified of EIA initiation.
07.11.2024	TTJA forwards Finnish answer to the Developer.
31.03-21.04.2025	First public display of the EIA Programme in Estonia.
23.04.2025	Public hearing at Sutlepa Leisure Centre.
May 2025	Answering to the comments received during EIA Programme public display and hearing.
June-August.2025	Cooperation with Geological Survey of Estonia. As a result EstLink3 submarine cable route corridor was shifted and widened.
07.11.2025	Elering submits the request to amend the superficies license application.
02.04.2026	TTJA amends the EIA and superficies license procedure initiation decision.
April 2026	Updating the EIA Programme.
30.04.2026	Ministry of Climate informs Finland about the updated cable route corridor.
May-June 2026	Supplementary public display and hearing of the updated EIA Programme.
2026-2027	Expected period for surveys and studies.
2027-2028	Expected period for preparation of the EIA Report.
2028-2029	Expected public disclosure, consultation and approval stage for the EIA Report.

6.3. Public disclosure and transboundary cooperation

The first public display took place from 31.03 to 21.04.2025. Several authorities and one local council member submitted comments. The public hearing was held on 23.04.2025 in Sutlepa close to the landfall area of the marine cables. As a result of EIA Programme publication, Geological Survey of Estonia was included to the EIA team and the corridor was widened and shifted. Based on that the superficies license application (07.11.2025) and the EIA initiation decision (02.04.2026) were amended. The landfall remains planned on the Hara Bay coast, but the exact route within the corridor will be determined during the EIA Report stage based on the results of studies and expert assessments.EIA programme was updated in April 2026 (see Table 6).

Finland was notified under the transboundary EIA procedure. As part of the public disclosure of the EIA Programme and the transboundary consultation, the Ministry of Climate received a statement from the Finnish competent authority, the Finnish Environment Institute, by letter No SYKE/2024/1695 dated 28.05.2025. The letter summarises the views of the relevant Finnish authorities and stakeholders on the EstLink3 EIA Programme, covering the following topics:

- the EIA must address potential transboundary impacts;
- submarine cables must be buried to a depth of at least 1.5 m in order to prevent possible damage to the cables by ships' anchors;
- the EIA must address the impacts associated with the construction of submarine cables on maritime safety, including fairways and vessel traffic, navigation, etc., as well as on existing underwater infrastructure, such

as cables and pipelines on the seabed. Cooperation should be carried out with the following authorities: Traficom, Fintraffic and the Finnish Border Guard;

- when determining the exact location of the submarine cables, underwater cultural heritage must be taken into account and, where necessary, the route should be shifted in order to avoid significant adverse impacts on underwater cultural heritage. Construction works for the submarine cables should remain at least 300 m from the known location of any cultural heritage object.

Since the above-mentioned topics have already been addressed in the EIA Programme and the related impacts will be assessed during the preparation of the EIA report, it was not necessary to amend the EIA programme on the basis of the outcome of the transboundary consultation.

Annexes and source material

The source document includes annexes with the EIA initiation decision, superficies license application materials, amendment materials, materials from the 2025 public disclosure, a table of comments and responses, and the minutes of the public hearing held on 23.04.2025 in Sutlepa.