

Authority Services

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Federal Maritime and Hydrographic Agency
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Finland's comments on the site development plan and the environmental reports (North Sea and Baltic Sea) within the framework of the strategic environmental assessment

The Finnish Environment Institute hereby acknowledges that Finland has received the consultation letter from the German Federal Maritime and Hydrographic Agency (BSH), dated 16 August 2024, and the documentation, which included the draft plans and the environmental reports, regarding Strategic Environmental Assessment (SEA) of the amendments of German's s maritime spatial plan.

Finland has the possibility to participate in the assessments in accordance with Article 10 of the Protocol of Strategic Environmental Assessment (Protocol on SEA) to the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention). The Finnish Environment Institute (Syke) has earlier on 27 March 2024 responded to Germany that Finland will participate in the Strategic Environmental Assessment of the Germany's site development plan (North Sea and Baltic Sea).

The purpose of the German site development plan is to promote the expansion of offshore wind energy and the offshore connection lines required for this. The purpose is to achieve the statutory expansion targets for offshore wind energy, to expand electricity generation from offshore wind turbines in a spatially organised and space-saving manner, to ensure the orderly and efficient use and utilisation of offshore connection lines and to plan, construct, commission and use offshore connection lines in parallel with the expansion of electricity generation from offshore wind turbines.



Consultation in Finland

The German Federal Maritime and Hydrographic Agency requested Finnish Environment Institute to collect and submit any comments and statements received in Finland by 16 October 2024. The public and authorities in Finland were given the opportunity to comment on the consultation documents from 22 August to 7 October 2024. The consultation documents were available, and statements were asked on the website of Finland's environmental administration and on the website of electronic public consultation. The Finnish Environment Institute received 7 responses.

Statements received in Finland

Centre for Economic Development, Transport, and the Environment of Southwest Finland

General information on the environmental report

The environmental report on the update and draft of the maritime spatial plan is quite comprehensive and, for the most part, difficult to understand, with dozens of abbreviations. It would have been helpful to present the issue in a more concise and readable form for international consultation. The text of a machine-translated document contains incorrect words, expressions, and sentence structures, which makes it difficult to understand the plan and its estimated impacts, as well as to give an opinion.

Impact on nature

On a large scale, coordinated alignment of offshore wind power areas with natural values is a good procedure that can be followed to ensure that the combined impacts on nature of wind power projects located in the area can be appropriately considered. Directing electricity transmission cables so that they are largely concentrated in a single area will help avoid further deterioration of seabed habitats, thus reducing synergies between future projects. However, this means that the power plants themselves may also be concentrated in a more limited area. This can create a closer barrier that may, for example, have a stronger impact on migratory species migrating through the area. The expansion of the wind power area will increase the potential impacts of the project on nature, which must be kept constantly included and highlighted in the assessment. It is important to understand and justify the effects of the full scope of the project, also compared to a situation where the wind power production area would not be as centralized. Without this comparison, it is difficult to establish whether this is really the most effective option for nature and/or society. This topic is touched upon in Chapter 7, which also highlights the inadequacy of the proposed offshore wind expansion plan to achieve the final targets. According to the plan, offshore wind power will have to be significantly increased in the German maritime area in the future. In this case, special caution must be exercised when excluding significant impacts on nature, to consider, the inevitably increasing pressure caused by wind power in the future, which could possibly change the starting points of the current assessment in the area.

The impacts of the project on Finnish nature will mainly affect migratory species. Of these species' groups, migratory fish, migratory birds and possibly bats may pass through the area to Finland, which means that an appropriate and thorough environmental impact assessment of



the project is also of great importance for nature conservation in Finland. Especially as the project plan expands, it is necessary to address the impacts on nature with the latest possible research data and scientific background material. This comment deals mainly with the potential impacts on Finnish nature.

Regarding the environmental report, the amendment of the RDP has brought some new issues to consider. Measures concerning the updating of species data and new data sources are necessary and, as a rule, must be comprehensive. However, the conclusions drawn based on the updated data on the effects of the change in the project plan are justified very briefly, so a more comprehensive discussion of them would be appropriate for many of the impacts as at present the responses are largely short, repetitive statements. Regarding initial data on bats, the recommendation that was made based on the studies that surveys in the area should be continued to exclude uncertainties regarding species data should be implemented.

The need for updates concerning birds, marine mammals and bats has been identified mainly comprehensively in sections 4.6–4.9, and the information provided also emphasizes the need for further research into species groups, which the ELY Centre supports. The ELY Centre generally welcomes the planning and implementation of impact monitoring. However, to obtain comparable data, monitoring should be carried out using the same methods even before the implementation of the plan and projects.

Point 6 of the project's environmental report, which deals with avoiding negative impacts, remains incomplete and only covers impacts on migratory bird populations. For other species groups, it is also necessary to study preventive or real-time measures to avoid environmental impacts. All in all, the changes required by the update of the project plan in the study plans and impact assessment have been considered satisfactorily for the most part. However, the ELY Centre wishes to emphasize the concerns raised in the statement issued in the previous phase of the project, for example regarding the protection network. As the project area now expands, and especially in the future, considering the final objectives, the topic must be addressed comprehensively and across national borders.

Combined effects

Although the plan in question is located far from the Finnish coast and exclusive economic zone, many offshore wind power projects are planned in the Baltic Sea region, and the ELY Centre considers that the combined effects of projects located in the exclusive economic zones of different countries can be significant. The plan and environmental report do not clearly indicate how and to what extent the combined effects have been assessed. Therefore, it remains unclear on what basis it has been established that the combined effects would not be significant. Future attention must be paid to assessing and mitigating synergies.

The Finnish Heritage Agency

The Finnish Heritage Agency has studied the matter primarily regarding the consideration of underwater cultural heritage.

As the authority responsible for the protection of cultural heritage in Finland, the Finnish Heritage Agency states that offshore wind farms and their submarine cable systems are large-scale water construction projects, the preparation of which requires obtaining sufficient



information on the underwater cultural heritage of the project area both in territorial waters and in the exclusive economic zone. The impact on cultural heritage must be assessed and, where necessary, mitigated. In general, the Finnish Heritage Agency considers it important that both the regional development plan and the environmental reports of the North Sea and the Baltic Sea highlight the theme of cultural heritage (e.g. taking cultural heritage into account in projects, as well as uncertainty of information related to cultural heritage and criteria for valuing sites). In particular, the North Sea Environmental Report describes the archaeological heritage at the bottom of the sea, including prehistoric settlements and various wrecks in the North Sea. It is positive that the expression “cultural traces such as submerged seascapes” is used to refer to these phenomena in a holistic landscape context.

There is no national legislation protecting underwater cultural heritage in Germany's exclusive economic zone. In this context, it is good that the environmental report refers to the UN Convention on the Law of the Sea, Article 303 which states the obligation of states to protect archaeological and historical objects found at sea. It is also good that the documents highlight the impact of projects on seascapes.

Shipwrecks can have historical links with different states. International exchange of information related to wrecks and their protection and research is a prerequisite for understanding the history of the sites and for their benefit. However, underwater cultural heritage sites are physical remains located in a limited area for which mapping, conservation and research activities do not have concrete cross-border environmental impacts. In projects where, for example, cables or pipes are placed in the territorial waters or exclusive economic zones of several states, the authorities of each country ensure that cultural heritage is considered in their own territory.

In the view of the Finnish Heritage Agency, from the perspective of considering cultural heritage, Finland has no need to participate in the amendment and updating of the German maritime spatial plan. As far as possible, the Finnish Heritage Agency monitors the development of maritime spatial planning in other countries and participates in the updating of maritime spatial planning in Finland.

The Finnish Transport and Communications Agency (Traficom)

From a maritime perspective, offshore wind farms may affect, for example, the safety and smoothness of maritime traffic and maritime radar and radio systems, if the offshore wind farm is located close to maritime traffic areas.

When expanding and increasing the areas allocated for offshore wind power and changing shipping traffic areas in densely trafficked sea areas, it is also important to consider the development plans of neighboring countries to ensure uniformity and to ensure the safety and smoothness of international shipping also in the future.

Shipping to and from Finland passes through the planning areas. In addition to considering the corresponding challenges related to the coordination of spatial uses in the sea area in the northern Baltic Sea, it would be justified to be able to follow the process of amending the maritime area development plan. From Finland's point of view, it would also be useful to obtain more information on, for example, the studies used to support planning and the practices applied when coordinating shipping and offshore wind power in densely trafficked sea areas.



The Government of Åland

The Government of Åland has decided not to issue a statement regarding the German maritime spatial plan, which pertains to the North Sea and southern Baltic Sea, as the distance to Åland's waters is so extensive that direct effects of the changes are considered unlikely.

Finnish Safety and Chemicals Agency (Tukes)

The Finnish Safety and Chemicals Agency (Tukes) does not have any comment on the matter.

Finnish Meteorological Institute (FMI)

The Finnish Meteorological Institute considers that the environmental assessment is comprehensive and that the Finnish Meteorological Institute has no comments to make on the environmental assessment.

Ministry of Transport and Communications

The Ministry of Transport and Communications does not issue a statement on the matter.

Conclusions

The Finnish Environment Institute has prepared a summary of the original statements in English above. However, the original statements which are enclosed to this letter, include important and detailed remarks which need to be taken into consideration in its entirety.

Based on the statements received the impacts on nature may vary depending on whether the wind power area is built in a more limited or larger area. Comparing these two scenarios is essential, as without comparisons, it is challenging to assess which option is most effective for nature and/or society. In addition, and according to the plan, offshore wind power will be significantly increased in the German sea area in the future. When expanding and increasing the areas allocated for offshore wind power and changing shipping traffic areas in densely trafficked sea areas, it is also important to consider the development plans of neighbouring countries to ensure uniformity and to ensure the safety and smoothness of international shipping also in the future. In addition, the combined effects of projects located in the exclusive economic zones of different Baltic Sea countries can be significant. Future attention must be paid to assessing the cumulative impacts.



Head of Services

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Ulla Helminen

This document has been electronically signed.

Appendices

Statements received in Finland

Distribution

Swedish Environmental Protection Agency

For information

Ministry of the Foreign Affairs
Ministry of the Environment
Finnish Meteorological Institute (FMI)
Finnish Safety and Chemicals Agency
Ministry of Transport and Communications
Finnish Transport and Communications Agency (Traficom)
Centre for Economic Development, Transport and the Environment
of Southwest of Finland
The Finnish Heritage Agency
The Government of Åland

