

Authority services

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Ministry of Climate
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Finland's response to the notification in accordance with Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) concerning the updated EIA programme for the EstLink 3 submarine power cable project

The Finnish Environment Institute acknowledges that Finland has received the notification from Estonia on 18 May 2026, in accordance with Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention), concerning the updated EIA programme for the EstLink 3 submarine power cable project. The project was previously subject to transboundary consultation in Finland in spring 2025, and Finland informed Estonia of its intention to participate in the EIA procedure.

Information on the planned project

Elering AS has applied for a construction permit for the installation of a subsea high-voltage direct current (HVDC) cable (EstLink 3) in the Gulf of Finland. The cable will extend from the village of Aulepa in Estonia to the boundary of Finland's exclusive economic zone (EEZ) in the Gulf of Finland. The length of the cable from the Estonian coast to the boundary of Finland's EEZ is approximately 54 kilometres. The planned transmission capacity of the cable is up to 700 megawatts (MW) of direct current at a voltage of up to 525 kilovolts (kV). The cable will be buried in the seabed sediments at a depth of approximately 1–1.5 metres.

The updated EIA programme includes modifications to the planned cable route, particularly in the vicinity of Osmussaar, to improve technical feasibility and avoid challenging seabed conditions.

Consultation in Finland

In accordance with Section 30, Subsection 1 of the Finnish Act on Environmental Impact Assessment (252/2017), the Finnish Environment Institute is the competent authority and responsible for tasks under the Espoo Convention.

In the notification, the Estonian Ministry of Climate requested comments and proposals regarding the assessment of the environmental impacts of the project affecting Finland, as well as comments received from the public and the authorities in Finland on the updated EIA programme.

Following the notification, the public and the authorities were given an opportunity to comment on the updated EIA programme from 1 June to 1 July 2026. The documents were made available on

the website of Finland's environmental administration and on the Ministry of Justice's online consultation platform (lausuntopalvelu.fi). Statements were also requested from relevant stakeholders

Remarks received during the consultation

The Finnish Environment Institute has prepared an English summary of the nine (9) statements received in Finland. However, the original statements in Finnish or Swedish, which are enclosed to this letter, include important and detailed remarks which need to be examined and taken into consideration in their entirety.

The Finnish Supervisory Agency notes that, in its statement dated 21 October 2024, the Environment and Natural Resources Division of the Centre for Economic Development, Transport and the Environment for Southwest Finland (ELY Centre) supported Finland's participation in the environmental impact assessment procedure for the proposed project and presented its views on the project's transboundary environmental impacts. Following the reform of the regional state administration, responsibility for issuing such statements was transferred to the Finnish Supervisory Agency on 1 January 2026. The Finnish Supervisory Agency requests that the transboundary environmental impacts identified in the ELY Centre's statement be taken into account in the updated EIA programme.

The Finnish Meteorological Institute has reviewed the updated EIA programme for the EstLink 3 submarine power cable project and considers it to be comprehensive with regard to the physical marine environment. The Institute has no further comments on the programme.

The Finnish Heritage Agency refers to its statement of 13 May 2025 on the previous EIA documentation for the EstLink 3 project, submitted to the Finnish Environment Institute from the perspective of underwater cultural heritage. Although the originally planned submarine cable route has subsequently been modified and new consultation documents have been prepared, the Agency sees no reason to revise its previous statement. It welcomes the fact that the updated documentation continues to address underwater cultural heritage and identifies the relevant survey and protection needs.

Fingrid Oyj supports the EstLink 3 project and noted that it is being jointly developed with Elering as the planned third electricity interconnection between Finland and Estonia. Fingrid highlighted the project's importance for security of supply and European energy policy objectives.

YDHV Legal Team considered the EIA programme generally adequate but recommended a more detailed assessment of the new cable route, impacts on the marine environment, fish and fisheries, navigation, cumulative impacts, and the assessment of transboundary effects.

Helsinki-Uusimaa Regional Council, The Federation of Finnish Fisheries Associations, The Finnish Border Guard and The Finnish Safety and Chemicals Agency (Tukes) responded to the statement request but did not provide new comments on the matter.

Conclusions

Overall, the updated EIA programme was considered adequate by the Finnish authorities and stakeholders. Most of the statements did not include new comments. The comments received emphasised the importance of taking into account previously identified transboundary environmental impacts, ensuring a sufficiently detailed assessment of the modified cable route and its potential impacts on the marine environment, and continuing to consider underwater cultural heritage in the EIA process. In addition, the implementation of the project will require close cooperation between the Finnish and Estonian maritime authorities to ensure the safe coordination of maritime traffic and construction activities.

Finland requests that both the comments and statements submitted during the previous phase of the EIA procedure and the enclosed statements and comments summarised above be taken into account in the further EIA procedure. Finland wishes to receive the EIA report or its summary

translated in Finnish, and preferably also in English and Swedish, in the next phase of the EIA procedure

Head of Services

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This document has been electronically signed. The electronic signatures can be verified from the register office of the Finnish Environment Institute.

Attachment Statements received in Finland

For information Ministry for Foreign Affairs of Finland
Ministry of the Environment
Finnish Supervisory Agency
Finnish Transport and Communications Agency Traficom
Finnish Meteorological Institute
The Finnish Heritage Agency
Fingrid Oyj
YDHV Legal Team
Helsinki-Uusimaa Regional Council
Federation of Finnish Fisheries Associations
Finnish Border Guard
Finnish Safety and Chemicals Agency (Tukes)

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Seuraavat henkilöt (organisaationimen mukaisessa aakkosjärjestyksessä) ovat allekirjoittaneet tämän asiakirjan sähköisesti. / Följande personer (i bokstavsordning efter organisationens namn) har undertecknat detta dokument elektroniskt. / This document has been electronically signed by the following persons (in alphabetical order according to their organization's name):

Anna Reunamo, Suomen ympäristökeskus, viranomaispalvelut
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