Suomen ympäristökeskus
Finlands miljöcentral
Finnish Environment Institute

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Ministry of Climate
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Finland’s response to the letter regarding the environmental impact assessment of the submarine power cable EstLink 3 in Estonia

The Finnish Environment Institute acknowledges that Finland has received the letter dated 31 March 2025 and the environmental impact assessment (EIA) programme from Estonia regarding the submarine power cable EstLink 3. The letter is based on the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention). In addition, the Agreement between the Government of the Republic of Estonia and the Government of the Republic of Finland on Environmental Impact Assessment in a Transboundary Context is applied.

Estonia notified Finland in accordance with Article 3 of the Espoo Convention for the submarine power cable EstLink 3 on 3 September 2024. As a response to the notification, the Finnish Environment Institute replied on 31 October 2024 that Finland intends to participate in the EIA procedure of the planned project.

The planned project

Elering As has applied for a construction permit to install an underwater high-voltage direct current cable (EstLink 3) in the Gulf of Finland. The cable will extend from the town of Aulepa in Estonia to the border of Finland’s Exclusive Economic Zone (EEZ) in the Gulf of Finland. The length of the cable from the Estonian coast to the border of Finland’s EEZ is approximately 54 kilometres. The planned capacity of the cable is a maximum of 700 megawatts (MW) of direct current at a voltage of up to 525 kilovolts (kV). The cable will be embedded in the seabed sediments at a depth of about 1-1.5 metres.

Consultation in Finland

In accordance with Section 30 (911/2022), 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. The Ministry of Climate of Estonia requested to provide comments and proposals regarding the EIA of the project in Finland and to submit comments from the public and authorities in Finland.

The public and the authorities were given the opportunity to comment on the consultation documents from 3 April to 19 May 2025, which were available on the website of Finland's environmental administration and on a platform by Ministry of Justice in Finland for requesting and submitting statements electronically (lausuntopalvelu.fi). Statements were also requested from relevant stakeholders.

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Remarks received during the consultation

The Finnish Environment Institute has prepared an English summary of the seven (7) statements received in Finland. The original statements in Finnish, which are enclosed to this letter, include important and detailed remarks which need to be examined and taken into consideration in their entirety.

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

In its statement dated 21 October 2024, the Environment and Natural Resources Division of the ELY Centre of Southwest Finland supported Finland's participation in the environmental impact assessment procedure for the planned project and expressed its views on the transboundary environmental impacts of the project. The ELY Centre asks that the transboundary environmental impacts expressed in its statement are considered in the preparation of the EIA programme.

The Finnish Border Guard

The Border Guard has examined the material in the request for a statement. The material describes the cable burial depth in an unclear and possibly contradictory manner, e.g. "EstLink 3, EIA Programme, 20.1.2025" in the introduction on p.7 states: "*The total length of the submarine cable link is approximately 130 kilometres, of which approximately 53 kilometres is in Estonian waters, the cables are buried at a depth of 3 metres. The cables are buried in the seabed sediments at a depth of about 1-1.5 metres.*"

Especially in the Estonian-Finnish route sharing system, the cable should be buried at least 1.5 metres deep in the bottom sediment to ensure that the cable is not damaged by ships dragging anchors on the bottom. In the light of recent experience, ship anchors create a wake of more than 1 metre deep in the bottom sediment, especially in places where the sediment is soft. In addition, the trench where the cable is laid should be covered.

Transport and Communications Agency Traficom

Traficom has studied the project assessment documents and welcomes the fact that the project assessment planning has recognised the impact of the cable project also on shipping traffic in the Gulf of Finland.

When planning the cable route, consideration should be given to maritime traffic areas, waterways and their floating safety devices, anchorage areas and marine shelters, as well as to the cable’s protection needs and possibilities, especially in the busiest maritime areas. Consideration should also be given to existing subsea infrastructure such as cables and pipelines.

To ensure overall maritime safety and smooth cooperation, consultation and dialogue on the information exchange and traffic arrangements required for the project between the project promoter and the Finnish and Estonian maritime operators is essential. For Finland, the parties concerned are Traficom, the Finnish Border Guard and Fintraffic, with whom the project promoter should discuss the traffic arrangements and notifications required for the project approximately three months before the start of construction.

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Traficom, as the competent authority for vessel traffic services, requires that when a cable landing vessel enters the Gulf of Finland Reporting System (GOFREP) area, it must participate in it as required by the GOFREP Master's Guide.

In addition, Traficom requires that international standards "International Regulations for Preventing Collisions at Sea 1972 (COLREG)" are respected during the project.

Once the project proceeds to the procedure under the Water Act for Finnish marine areas, Traficom will specify in its statement on the project's application for a water management licence the notifications and information it will require on marine mapping and maritime traffic, as well as the practices to be followed during the implementation of the project.

The Finnish Heritage Agency

The Finnish Environment Institute has given the Finnish Heritage Agency the opportunity to comment on the EIA programme for the EstLink 3 submarine electricity cable in Estonia. The Finnish Heritage Agency will give its statement on the consideration of the underwater cultural heritage.

Elering As has applied for a construction permit in Estonia to install the EstLink 3 high-voltage direct current submarine cable in the Gulf of Finland. The submarine cable link will consist of up to three submarine power cables and one fiber optic cable. The cable route extends from the village of Aulepa in Estonia to the border of the Finnish Exclusive Economic Zone in the Gulf of Finland. The route has a length of 54 kilometres and a corridor width of 500 metres. The cables will be submerged in the seabed to a depth of three metres, possibly by ploughing or spraying. The seabed may need to be levelled for the cable, for example by placing soil along the route.

In its statement of 8 October 2024 on Finland's need to participate in the EIA process of the EstLink 3 project, the Finnish Heritage Agency stated that electricity cable projects of several tens of kilometres in length, which require the modification of the seabed, are large-scale hydraulic engineering projects, which must be prepared with sufficient knowledge of the underwater cultural heritage of the project area, both in territorial waters and in the EEZ. Where necessary, adverse impacts must be mitigated, for example by re-aligning the cable route to avoid underwater heritage sites. The Finnish Heritage Agency also stated that there are no actual transboundary impacts on underwater cultural heritage and that the Estonian cultural environment authorities are responsible for the protection of underwater cultural heritage in the Estonian territorial and Exclusive Economic zones.

The EIA programme for the EstLink 3 project, dated 20 January 2025, considers the protection of underwater cultural heritage. As a condition of the project, during the construction permit application phase, cooperation with the Estonian National Heritage Board (Muinsuskaitseamet) is required to prevent damage to the cultural heritage of the seabed. The description of the current situation indicated the currently known underwater sites (shipwrecks) closest to the cable route. The list of necessary studies and surveys states that an underwater archaeological survey must be carried out as part of the EIA process to determine whether there are any underwater cultural heritage sites along the planned EstLink 3 corridor. It is also noted that to reduce the adverse impact on underwater cultural heritage, the Estonian National Heritage Board requires that the construction works of the project remain at least 300 metres from underwater cultural heritage sites.

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The Finnish Heritage Agency considers it important and positive that the EIA programme of the EstLink 3 project gives due consideration to the survey and protection of underwater cultural heritage. The project area may also contain cultural heritage with links to Finland and its history, as well as to other Baltic Sea countries and the common maritime history.

Fingrid

The route of EstLink 3 will be located between Inkoo and Aulepa, but the exact route and impacts on the Finnish side will become clear in later stages of the planning.

Fingrid has no comments on the content of the consultation documents.

The Regional Council of Southwest Finland and **Helsinki-Uusimaa Regional Council** responded but did not have any comment on the matter.

Conclusions

The Finnish Environment Institute notes that based on the statements received, for the Estonian-Finnish route-sharing system, the cable should be buried at a minimum depth of 1.5 metres in the seabed to prevent damage from ship dragging along the bottom. To promote maritime safety and effective coordination, it is essential to engage in consultation and information exchange with Finnish and Estonian maritime authorities. In Finland, the parties concerned are Traficom, the Finnish Border Guard, and Fintraffic. Discussions should consider necessary traffic arrangements and notifications, ideally three months prior to the project's construction start.

In addition, as part of the environmental impact assessment, an underwater archaeological survey must be conducted to identify any cultural heritage along the planned cable route, with construction kept at least 300 metres from known sites.

The Finnish Environment Institute notes that the statements submitted earlier with the response dated 31 October 2024 must be considered in the environmental impact assessment of the project. The Finnish Environment Institute supports the implementation approach in which the impact assessments for the project in Finland and in Estonia would be carried out simultaneously, thus enabling a comprehensive assessment and analysis of the joint impacts of the planned submarine power cable connection between Estonia and Finland.

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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
Ministry of the Environment
Centre for Economic Development, and Transport of Southwest Finland
Fingrid
Finnish Transport and Communications Agency Traficom
Helsinki-Uusimaa Regional Council
The Finnish Border Guard
The Finnish Heritage Agency
The Regional Council of Southwest Finland