

Authority services

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Swedish Environmental Protection Agency
Richard Kristoffersson
richard.kristoffersson@swedishepa.se
registrator@naturvardsverket.se

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Finland's response to the notification regarding the planned offshore wind farm project Gävle Öst

The Finnish Environment Institute hereby acknowledges that Finland has received the notification, dated 10 April 2024, and the consultation documents from Sweden in accordance with Article 3(1) of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) regarding an environmental impact assessment (EIA) procedure of the planned offshore wind farm project Gävle Öst in Sweden's Exclusive Economic Zone. The developer, Gävle EW AB plans to apply for permission to construct and operate the offshore wind farm Gävle Öst Havsvindpark. The project area is planned about 80 km east of Söderhamn and about 65 km from the Swedish island of Agö outside Hudiksvall. The shortest distance to the Finnish mainland is approximately 140 km. The project area has a total area of approx. 400 km² containing a maximum of 324 wind turbines with a maximum effect of approx. 4,860 megawatts (MW). The planned maximum height of the wind turbines is 385 m above sea level.

Consultation in Finland

According to the Act on Environmental Impact Assessment Procedure (252/2017), the Finnish Environment Institute is the competent authority and responsible for consultation tasks related to the Espoo Convention. The Swedish Environmental Protection Agency requested an indication whether Finland intends to participate in the EIA procedure and to provide comments on the scope of for the assessment of the environmental impacts of the project on Finland, and to submit any comments that might be received from the public in Finland. The public and authorities were given the opportunity to comment on the consultation documents from 19 April to 20 May 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 12 statements.



Participation in the EIA procedure and statements received during the consultation

Based on the statements received and its own deliberations, the Finnish Environment Institute states in accordance with Article 3(3) of the Espoo Convention that Finland intends to participate in the EIA procedure.

The Finnish Environment Institute notes that based on statements received, the planned offshore wind project may have significant adverse effects, e.g., on birds, marine mammals, bats, and fish. The Bothnian Sea is an important wintering and feeding area for seabirds. Bird migration routes pass through the project area and some bird species may also use the project area during the breeding season. The state of fish stocks in the area may have an impact on the entire Bothnian Sea and the Gulf of Bothnia. The methodology described for assessing these impacts is very limited. There is no mention, for example, of how transboundary impacts and the interactions will be assessed.

The EIA documentation should clearly address the transboundary impacts from Finland's perspective. In the statements received, it was noted that the proposed offshore wind project is in an area subject to each country's national marine management plan and the spatial objectives set out therein. The objective of marine management is to ensure a good status of the marine environment, defined by 11 descriptors. Of these, at least biodiversity, food webs, seabed integrity and underwater noise level will be directly impacted at least locally by offshore wind energy development. There may also be impacts from harmful substances and litter, which is a significant pressure that should be assessed and mitigated both during construction and operation.

Furthermore, in the statements, two main concerns were raised: first, the current fishing use of the area for all EU countries, and the impact of the project on fishing opportunities, and second, the impact that the project may have on shipping to and from Finland, especially in icy conditions in wintertime.

The Finnish Environment Institute wishes to note that planning of offshore wind farms has increased in the Baltic Sea region, which has raised concerns, among other things, about the need for an overall assessment. In offshore wind farm projects, all contributing factors should be known, and their impacts assessed 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 for reducing them. In addition, as cumulative impacts of several offshore energy farms can potentially be ecologically significant, it is important to examine and assess cumulative impacts as widely as possible.

The original statements, which are enclosed with this letter, including important and detailed remarks which need be considered fully in the EIA. The Finnish Environment Institute has prepared a summary of the original statements.



Statements received

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

The ELY Centre of Southwest Finland states that the planned offshore wind farm project is located approximately 35 kilometres from the border of the Finnish Exclusive Economic Zone (EEZ) and 140 kilometres from the Finnish mainland. The ELY Centre considers that it is necessary for Finland to participate in the environmental impact assessment procedure for the project, as the project may have significant transboundary environmental impacts, which are likely to affect the Finnish maritime area.

The proposed offshore wind project is located in an area subject to each country's national marine management plan and the spatial objectives set out therein. The objective of marine management is a good status of the marine environment, defined by 11 descriptors. Of these, wind energy development will clearly have at least local direct impacts on biodiversity, food webs, seabed integrity and underwater noise. There may also be impacts on harmful substances and litter, which is a significant pressure that should be mitigated both during construction and operation.

In addition, the ELY Centre considers that the planned offshore wind project may have significant adverse effects on birds, marine mammals, bats, and fish in Finland. The Bothnian Sea is an important wintering and feeding area for seabirds. Bird migration routes pass through the project area and some bird species may also use the project area during the breeding season.

The importance of synergies is also highlighted for this offshore wind project. Several offshore wind projects are planned in the Baltic Sea region at various stages of development. There are at least two offshore wind projects under EIA procedure within a few tens of kilometres of the planned Gävle Öst offshore wind project in the Finnish EEZ. Thus, the combined effects of the different projects may be significant.

The ELY Centre notes that the EIA programme is of a general nature and the list of impacts to be assessed is only general. The methodology for assessing impacts is very limited, if at all existing. There is no mention of how transboundary impacts and interactions with, for example, the offshore wind farms planned on the Finnish side will be assessed. Transboundary impacts or their assessment plans are currently not described in sufficient detail. Information on projects in the Bothnian Sea should be sought from the national authorities responsible for project authorisation procedures. The planned studies also do not mention bat surveys. However, the possible presence of bats in the area should be investigated and an impact assessment should be planned, at least based on existing data.

Furthermore, the EIA programme makes no mention of marine management and the Swedish Marine Management Plan or the disposal of dredged material or location of dredging sites and their impacts. Risk assessment is also dealt with in very general terms.

It is important to be prepared for power plant failures in the event of storms or other accidents, both during construction and operation. During operation, for example, oil and other hazardous substances can leak during maintenance.



Centre for Economic Development, Transport, and Environment of Southwest Finland - Fisheries Authority

According to the Fisheries Authority's perspective, Finland should definitely participate in the EIA procedure for the Gävle Öst project. Finland has fishing rights in the project area, in the Swedish EEZ, in international waters, and the area is well suited for trawling. In addition, the fish stocks in the Baltic Sea are shared, and fisheries are regulated at EU level.

In accordance with Article 5(1) of Regulation EU 1380/2013 of the European Parliament and of the Council, Finnish fishing vessels have fishing rights in the Swedish EEZ where the planned wind farm is located. Fishing by Finnish vessels or vessels landing in Finland is intensive in the project area and its vicinity, with Finnish vessels accounting for the majority of the fishing effort in the area. The project area is very important for Finland's fisheries and security of supply. The project area is home to fish stocks that are important for the Finnish fishing industry, in particular herring, sprat, and salmon. Implementation of the project is very likely to mean the end of fishing in the project area and the surrounding areas.

The possibilities for avoiding fishing are limited, therefore the economic damage could amount to several million euros per year. The loss of fishing sites in the project area could even lead to changes in the entire value chain, with much greater impacts on fisheries and security of supply. In addition to the impact on fisheries, the ecological impact of such a large-scale project on the ecosystem of the marine area to be jointly exploited, and hence on shared fish stocks, could be significant. The Gävle Öst project is one of several projects that may be implemented simultaneously in the Bothnian Sea. The effects of significant projects alone can accumulate and permanently alter the marine environment. Therefore, all impacts must also be assessed in terms of cumulative impacts.

The consultation document sent to Finland is very limited. It does not describe the current state of the site and does not identify potential impacts. The description of the technical details of the project is also inadequate. The description of the environmental impact assessment process and study methods is very general, making it impossible to draw conclusions on the suitability and adequacy of the studies.

The version for Sweden on the project manager's website is also too limited to outline the concrete effects.

The Fisheries Authority urges the responsible authorities to require more detailed descriptions to better inform the consultation and launch the EIA process.

We believe that the following issues need to be thoroughly addressed in the EIA process:

- Current state of fisheries and permanent changes in fishing opportunities: wind farms and their remnants prevent trawling. The current fishing use of the area for all EU countries and the impact of the project on fishing opportunities need to be assessed. Potential trawl routes and haul-out sites need to be identified (through VMS data and interviews). Areas where trawling will become impossible should be mapped. If necessary, show how fishing can be made possible (e.g., trawling corridors, changes to project area boundaries). The long-term consequences of possible decommissioning or disaster should also be considered. The decommissioning capacity of power plants and other structures should be assessed. In our view, the technical conditions for safe trawling do not exist at distances of



less than 3 km between power plants. The value of the economic losses must be determined for the entire value chain.

- Impact of the export cable on fisheries: the location of the production area suggests that export cables are likely to pass through important trawl areas. Even a trawl-protected cable may prevent trawling with the same consequences as placing the production area in a trawl area. If export cables are not surveyed in the context of this procedure, a separate EIA procedure would have to be carried out for the cables, in which Finland would have the possibility to participate under the Espoo Convention.
- Transit possibilities for fishing vessels: the project area is an important transit area from various trawling areas to ports of landing in Finland and Sweden. If transit becomes technically impossible, the project will affect the fishing opportunities and profitability of Finnish vessels. The impact on fish quality, price and availability could be fatal. Therefore, the transit possibilities for fishing vessels need to be clarified (e.g., the impact of ice jettisoning) and mitigation measures need to be presented.
- Impact of sediment discharges from the construction phase on fish stocks: dredging, cabling and landfilling activities cause widespread sedimentation and discharges. The scale of the project suggests a release period of several years over a radius of at least tens of kilometres. Modelling of the sediment plume transport caused by the construction works and assessment of the impact on the physico-chemical conditions of the water (including oxygen and nutrients), both for the construction activities and for the resulting changes in the seabed profile, will be required. Timing options for expected sediment discharges should also be presented, so that the disturbance can be related to other future projects.

On this basis, an assessment must be made of the adverse effects on the spawning grounds, benthic fauna, and the oxygen status of the bottom waters in the affected area. Where appropriate, proposals should be made to avoid overloading sensitive areas (e.g., engineering solutions, construction strategies such as construction stoppages).

- Changes in flow conditions and stratification: the wind farm area is so large that impacts on surface currents are possible (wind attenuation, heaving and subsidence, foundation friction). These may affect water stratification, temperature, and concentrations of nutrients, salt, and oxygen at different depths. In theory, stronger stratification could alter nutrient concentrations in surface water, causing changes in fish production and blue-green algae blooms, which would primarily affect Finland due to prevailing westerly winds. The expected changes in wind and current conditions and their impact on physico-chemical conditions need to be modelled and the ecosystem and fisheries impact assessed.
- Toxic releases and their potential for accumulation in fish: the substances/compounds must be listed, along with estimated release amounts and release timescales, and an estimate of their accumulation in farmed fish. At least the following should be considered as potential sources: sediments, drilling chemicals, shielding paints, lubricants for turbines and moving parts, transformer coolants. The potential worst-case scenarios for accidental releases, e.g., sabotage, also need to be assessed in terms of their impact on fisheries.
- Potential threat from lightly mobile solid pollutants: in the Bothnian Sea, pine oil has been identified as a fishery nuisance, which has sunk to the bottom after coastal spills and is easily mobile. Once trawled, even small amounts can render catches of up to hundreds of



tonnes unusable. The presence of pine oil and related pollutants in the project area, their potential for movement, their pathways and the means of control must be assessed before any construction project of this magnitude is undertaken.

- Thermal emissions from production: point source heat emissions from the installation (water-cooled transformers, etc.) can affect the stratification of the water column in the surrounding areas and thus the chemical composition of surface and groundwater. There is also the possibility of an effect on ice cover.
- Quantities and distribution scenarios of heat emissions shall be presented, and their impacts shall be assessed and, where appropriate, modelled. Where appropriate, countermeasure options shall be presented. A position shall be taken on the possible production of hydrogen.
- Research-based assessment of the impact of the wind farm structures and possible artificial reefs on ecosystem structure and fish stocks (reef impact): the food chain in the Bothnian Sea is mainly pelagic, with fisheries based on relatively low trophic levels. This is also the basis for the effective nutrient removal effect of current fisheries. The impact of ecosystem change needs to be assessed and modelled where appropriate.
- Invasive species strategy: the Baltic Sea is vulnerable to invasive species, which can also have a negative impact on fish stocks. If other wind power projects go ahead, it seems likely that construction and dredging vessels and foundations will be imported from outside the Baltic Sea. Such equipment may be a more suitable platform for the establishment, survival, and settlement of various organisms than conventional commercial vessels. The project manager must have an understanding of the threat of invasive species and a strategy to address it. The steppingstone effect of artificial structures in the park must also be taken into account, e.g., when choosing different construction materials. The thermal and reef effect (local eutrophication) must also be assessed in this context. Permanent species monitoring is desirable.

In addition, the Fisheries Authority considers it necessary to take a position on the issues of principle relating to offshore wind energy:

- Cumulative effects: several wind farms of the same scale are planned in the vicinity of the project. In addition, there are dozens of projects planned or pending in the Gulf of Bothnia. In total, about one third of the area of the Bothnian Sea may become a wind energy area, so that the limits of ecological carrying capacity are at least possible to be reached. Therefore, synergies with other projects need to be considered in detail. If synergies cannot be adequately identified and assessed, the precautionary principle must be applied.
- Importance and availability of research data: offshore wind farms are a new phenomenon and relatively little research is available on their impact. The ecosystems in the Bothnian Sea are simpler, salinity is lower, and winter is a more important factor than in existing wind energy areas. It is therefore difficult to apply research data from elsewhere. There are also no familiar segments of fisheries and no alternatives. Therefore, projects in the area need to be informed by research and monitoring. Offshore wind projects are very different from other large-scale projects in terms of the information available. We urge project managers to commission studies in a timely manner and on a sufficiently broad basis.
- Reef effect: the positive impact on fisheries observed in the oceans is highly unlikely in the project area, as the target species (large and/or long-lived demersal fish, crustaceans, or molluscs) are almost absent in the northern Baltic Sea. We see the reef effect mainly as a change in natural ecosystems, which should be approached primarily with a precautionary



approach.

- Avoiding fishing disturbance and compensation: trawling should not be disturbed on a large scale. Financial compensation is potentially detrimental to the sustainability of the fishing sector and is therefore not seen as an option. Resources must be used to avoid disturbance.

Ministry of Transport and Communications

The Ministry of Transport and Communications states that the project preparation document has not assessed the transboundary effects of the project, the cumulative effects of the offshore wind projects planned in the vicinity of the Gävle Öst project, nor the effects of the planned project on the ice conditions in the area. The working document has also not assessed the impact on changes in maritime safety or on shipping in ice conditions.

In the view of the Ministry of Transport and Communications, Finland would be justified in participating in the environmental impact assessment procedure for the planned project. Given the location of the project area, the project may also have an impact on shipping to and from Finland, especially in ice conditions. For this reason, the potential combined effects of offshore wind projects on maritime transport in the whole region should be comprehensively assessed. The construction of a large number of offshore wind farms can have a significant impact on the safety and smoothness of maritime traffic. These impacts may relate at least to changes in traffic routes, fuel consumption, weather observation equipment, radar reflection effects and winter navigation. A study is also required on the impact of the project on the ice conditions in the area, whose spill-over effects on maritime traffic may extend significantly beyond the project area.

The construction of offshore wind farm sites must consider the impact on maritime transport infrastructure and air traffic. Smooth and safe maritime traffic in the fairways and offshore maritime areas all year round is important, as the majority of Finland's foreign trade flows by sea. Attention to maritime transport is important to safeguard the operational capacity of Finnish merchant shipping and to ensure safe and smooth maritime transport. The design of offshore wind farms must take into account the unhindered use of the fairways. Offshore wind farms can change traffic areas and routes, increase travel times, and increase emissions from ships as fuel consumption increases. In the delineation of planned offshore wind projects, it is important to take into account the routes used by shipping outside the established fairways and routing systems, so that the operational and safety conditions of shipping are taken into account in the planned project area. In addition, special attention shall be paid to the traffic routes used by winter shipping, which are different from those used in open waters. The impact of offshore wind energy on air traffic will depend on the location and number of offshore wind turbines. The height of the turbines has an impact on flight safety, and the location of wind turbines in relation to flight paths can have cost implications.

Offshore wind farms can affect, among other things, maritime radar systems and safety, weather radars and the use of radio frequencies. The reliable operation of radar systems is an essential part of maintaining overall maritime safety and has an impact on the Finnish Meteorological Institute's detection equipment. In addition, wind turbines have an impact on the field strength and signal quality of mobile networks. Radio links operating in the maritime domain require a completely unobstructed area between the transmitter and the receiver. Coastal and maritime electronic communications services depend on radio systems, which is



why it is important to ensure that mobile services, radar, and radio links are sufficiently interference-free to operate in maritime areas. Even small changes in the siting of wind turbines can have a decisive impact on the operation of radio systems in the area.

In other respects, the Ministry of Transport and Communications refers to the opinion of the Finnish Transport and Communications Agency Traficom.

Finnish Transport and Communications Agency Traficom

Planned offshore wind projects in the Gulf of Bothnia have increased significantly in recent years, both in Finland and Sweden, and are increasingly located offshore, up to the outer limits of the EEZs. When implemented, large offshore wind farms, and especially offshore wind farms located in close proximity to each other, can have a significant impact on the entire Gulf of Bothnia maritime transport, both in terms of safety and smoothness.

In the delineation of planned offshore wind projects, it is important to take into account the routes used by shipping also outside the established fairways and routing systems, so that the operational and safety conditions of shipping are taken into account in the planned project area. In addition, particular attention should be paid to winter shipping routes, which are different from those used in open water and may not be clearly evident from the traffic flow analyses, based on AIS data, covering the entire traffic flow conducted in the area. Other offshore wind projects are planned in the vicinity of the planned Gävle Öst offshore wind farm, both in the Swedish and Finnish Exclusive Economic Zones, which will further increase the impact of offshore wind on shipping. However, the project preparation document does not mention or show the locations of the surrounding projects in relation to the planned Gävle Öst offshore wind farm.

The cumulative impact of the surrounding offshore wind projects on shipping in the area should be fully investigated in the EIA process of the project. The impact of the project on the ice conditions in the area also needs to be examined. Large and closely spaced wind farms may concentrate and change shipping routes from the current ones (to be taken into account in the impact assessment), and hundreds of wind turbines will disrupt the mobile ice sheet in the region when built. As a result, the amount of ice in the area is likely to increase and accumulate, which may affect, among other things, winter navigation.

The Gävle Öst offshore wind project is located in an area of the sea where there is ice breaking during severe ice winters. Traficom reiterates what it has said before about other planned projects in the vicinity of the area; in anticipation of future projects, it would be important to consult both the Swedish and Finnish icebreaking authorities on offshore wind projects outside territorial waters, so that icebreaking cooperation and winter sea routes other than open waters can be taken into account in the planning phase of the projects, and the overall picture of the marine environment and possible changes to it can be brought to the attention of the authorities as early as possible.

When planning the location of the area for wind turbines and individual wind turbine structures, the use of radar as the main navigation and collision avoidance tool for ships and its key role in winter navigation and traffic management should be considered. The assessment of impacts should also take into account the abnormal use of ships' radars in ice conditions. Wind turbines can cause either shadowing or reflection effects on maritime radars, which in the worst case can make it difficult to interpret radar signals. Wind turbines can also affect the satellite positioning of ships, i.e., the Global Navigation Satellite System (GNSS), by causing satellite signals to be reflected through the wind turbines, resulting in incorrect positioning of the ship or



vessel using the system.

When planning the location of a wind farm site - and subsequently of individual wind turbines - the potential impact of wind turbines on maritime and coastal radio systems must also be considered. The reliable operation of radar and radio systems is an essential part of maintaining maritime and public safety. In addition, wind turbines have an impact on the field strength and signal quality of mobile networks. Radio links operating in the maritime domain require a completely unobstructed area between the transmitter and the receiver. Coastal and maritime electronic communications services are dependent on radio systems, and it is therefore important to ensure that mobile services, radar, and radio links are sufficiently interference-free to operate in maritime areas. Even small changes in the siting of wind turbines can have a decisive impact on the operation of radio systems in the area. Traficom considers it important that these issues are also taken into account.

In Traficom's view, Finland would be justified in participating in the EIA procedure for the planned project, because, given the location of the project area and the other offshore wind projects planned in the vicinity of the project area, the project may also have an impact on shipping to and from Finland, especially in ice conditions, when vessels seek the smoothest possible passage off the Swedish coast in situations where winds have carried ice to the Finnish coast. In addition to the above, Traficom wishes to highlight several offshore wind projects located on the external borders of the Finnish and Swedish Exclusive Economic Zones. In order to ensure a well-managed coordination of land use and equal treatment of projects, it would be justified to establish a co-operation network between Finland and Sweden at a sufficiently high level to guide the planning of offshore wind projects.

Natural Resources Institute Finland (Luke)

Finnish trawlers fish for herring in the project area, so if the project were implemented, it would also have a potential impact on Finnish commercial fisheries.

The request for an opinion stated that the consultation document corresponds to the evaluation programme. However, the consultation document is very short and general. For example, regarding fish, fisheries, and birds, it only states that potential impacts on neighbouring countries will be examined. No further details are given.

The Government of Åland

Finland should participate in the environmental impact assessment procedure. The project is located at such a small distance from Åland's waters that there is a risk of direct effects for Åland.

Finnish Meteorological Institute

The Finnish Meteorological Institute considers that Finland should participate in the EIA procedure since the park will affect the Finnish Meteorological Institute's marine measurement activities. The Finnish Meteorological Institute operates freely drifting profiling Argo buoys in the Bothnian Sea, and if the drifting of the buoys in the park area is to be prevented, their lifting may cause costs and interruptions to measurements. There is no need for a radar network as the area is more than 20 km from the nearest installation radar.

According to the Finnish Meteorological Institute, the effects of the wind farm on the physics of the sea are likely to be confined to Sweden, although the wake effect and changes in sea



currents caused by the wind farm may extend over a wider area.

The Finnish Meteorological Institute considers the assessment programme to be comprehensive in terms of marine physics, although we recommend that the impact on monitoring the state of the Baltic Sea is taken into account (e.g. location of HELCOM monitoring stations in relation to the park, how to obtain measurements from the park area the future).

The Federation of Finnish Fisheries Associations

The Federation of Finnish Fisheries Associations considers that Finland should participate in the EIA assessment. Finnish vessels fish in the area and, in addition, several wind turbines are currently planned in the area, both on the Finnish and Swedish sides. The combined impact of these projects has not been sufficiently analysed. The projects have a negative impact on fish (both spawning and spawning migration of different species) and fishing itself in the area.

The assessment programme is currently very superficial and general, and the next stages of the process will need to look in more detail at the effects on the fish stocks of the area and on the fish migrating through the area, in addition to just investigating the fisheries in the area (Table 6.1). Similarly, the assessment needs to estimate the cumulative effects of other wind turbine projects underway or planned in the area, including both Swedish and Finnish waters.

In addition to the location of the power plants, it must be remembered to examine the effects of electricity transmission and in particular the effects of the different route options. It is recommended to implement the electricity transmission as a coordinated joint route project to minimise the cumulative effects and damage of the electricity transmission.

Finnish Association of Professional Fishermen (SAKL)

A large number of industrial areas for offshore wind are currently being planned in the Bothnian Sea, the Gulf of Bothnia and the northern parts of the Baltic Proper.

SAKL believes that too much knowledge is still lacking regarding the impact of offshore wind sites on the marine environment, in particular on different fish species. More knowledge needs to be developed and analysed before offshore wind energy can be considered at all.

For pelagic fisheries, coexistence with wind power on the same area is currently impossible and many offshore wind areas compete with our fisheries for space in the sea. The area in question overlaps with an economically important fishing area. The industrial area made future fishing impossible. In practice, areas with fishing bans are created. The area is important for both Finnish and Swedish commercial fishing (trawling). In November 2023, the Natural Resources Institute Finland published a report on important trawling areas, (https://sakl.fi/wp-content/uploads/luke-luobio_102_2023.pdf), in Finnish. The report also contains information on Swedish fishing.

The Finnish fishing industry is concerned about the large number of existing and planned wind power establishments in our surrounding waters and the cumulative impact these may have on the environment and fish stocks. We call for a comprehensive analysis of the cumulative impact of the planned industrial areas on the ecosystem and of future fishing opportunities in the area before decisions are made on measures and activities competing for space. In the area in question, we also believe that the impact on future fish spawning of, among other things,



herring on the seabed needs to be specifically investigated.

In addition to the impacts of the production area itself, the impacts of the cabling in the production area and the transmission of electricity to shore should also be carefully analysed. The material submitted in response to the request for an opinion is very general in its content regarding fish stocks and commercial fishing and contains shortcomings and even outright errors.

We also refer to the statement issued by the ELY Centre of Southwest Finland (Fisheries Authority) in the case in question.

With reference to the above, SAKL considers it to be absolutely necessary for Finland to participate in the planned EIA process för Gävle Öst, referred to as the industrial area for offshore wind.

Regional Council of Satakunta

Regional Council of Satakunta highlights the Finnish Marine Spatial Plan 2030, which was adopted at the end of 2020 and should also be taken into account in the EIA process. The Finnish Marine Spatial Plan 2030 does not present offshore wind power as a site reservation but identifies potential areas for offshore wind power development. The Finnish Marine Spatial Plan 2030 is not legally binding, but its effectiveness is based on extensive stakeholder cooperation and coordination of the objectives of different sectors.

The planning of offshore wind power in the Gulf of Bothnia and the Bothnian Sea has increased significantly in recent years. As offshore wind power has impacts on other uses of the sea and on important industries in the Bothnian Sea, such as shipping and fishing, as well as on the environment and natural ecosystems, there is an obvious need for coordination of project planning throughout the Gulf of Bothnia. The energy transfer associated with offshore wind power also has an impact on the environment, ecosystems, and land use in the continental areas. Closer cooperation between countries is needed to support a controlled development pattern and to assess the overall impact.

Although the distance of the planning area to the Finnish coast is approximately 140 km, the Regional Council of Satakunta believes that the EIA process of the Gävle Öst offshore wind project should also take into account the possible impacts on the Finnish maritime area. Impacts that extend beyond the project area alone and that need to be examined include the effects on birds and fisheries. The Gulf of Bothnia is an important migration route for birds and the state of fish stocks affects the entire Bothnian Sea and the Gulf of Bothnia. In addition to the fishing industry, the impact assessment must pay particular attention to shipping and consider the varying ice conditions in the Bothnian Sea. The cumulative effects of offshore wind power projects planned for the Bothnian Sea must be examined.

The Regional Council of Satakunta considers it necessary for Finland to participate in the environmental impact assessment procedure for the Gävle Öst offshore wind power project in the Swedish EEZ, for the reasons mentioned above. In addition, the Regional Council of Satakunta emphasises the importance of an open, interactive, and sufficiently comprehensive assessment process for large-scale offshore wind projects. The Satakunta Association does not consider it necessary for it to participate in the EIA process itself, but it wishes to be kept informed of the progress of the process, for example through the coordination group for marine



spatial planning.

Ministry of Agriculture and Forestry

The Ministry of Agriculture and Forestry is in favour of Finland participating in Gävle Öst's EIA procedure in accordance with the Espoo Convention.

The project area is an important trawl fishing area for Finnish fishing vessels and in addition to fishing, the project may have significant impacts on fish stocks and marine life.

Metsähallitus

Metsähallitus states that it will not issue a statement.

Service Development Director

Heli Karjalainen

Senior Officer,
Point of Contact to the Espoo Convention
and the Protocol on SEA

Ulla Helminen

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



Appendices Statements received in Finland

For information Ministry for the Foreign Affairs of Finland
Ministry of the Environment
Ministry of Agriculture and Forestry
Ministry of Transport and Communications
Finnish Transport and Communications Agency (Traficom)
Finnish Meteorological Institute
Finnish Transport Infrastructure Agency
Finnish Association of Professional Fishermen (SAKL)
The Federation of Finnish Fisheries Associations
Centre for Economic Development, Transport, and the Environment of Southwest Finland
Centre for Economic Development, Transport, and the Environment of Southwest Finland – Fisheries Authority
Regional Council of Satakunta
Government of Åland
Metsähallitus

