

Authority Services

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Finland's response to the supplementary consultation in accordance with Articles 4 and 5 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) for the planned offshore wind farm Bothnia Offshore Lambda North in Sweden

The Finnish Environment Institute acknowledges that Finland has received the supplementary consultation request from Sweden on 25 November 2025, in accordance with Articles 4 and 5 of the Espoo Convention. Sweden invited authorities and organisations in Finland that contributed with comments in prior consultation to review attached replies, and if needed, present further comments based on attached documents to be handled in the permit application process.

Notification

Sweden notified Finland of the initiation of the environmental impact assessment (EIA) procedure for the Bothnia Offshore Lambda offshore wind farm project on 8 March 2023. The Finnish Environment Institute responded on 26 April 2023 that Finland intends to participate in the EIA procedure of the planned project.

Changes in the project area

In autumn 2023, the Swedish Environmental Protection Agency (Naturvårdsverket) announced that the project area for the offshore wind farm had been expanded westwards towards the Swedish coast. The change to the project area had been implemented to make it more flexible in relation to the needs of the Swedish Armed Forces and to enable necessary changes to shipping. At the same time, the Bothnia Offshore Lambda project area was divided into two sub-areas, Lambda North and Lambda South. At that time, the Finnish Environment Institute assessed that the change to the project area was not likely to have significant environmental impacts on Finland. Therefore, no additional consultation on the changes to the project area was organised in Finland.

Consultation in accordance with Articles 4 and 5 of the Espoo Convention

On 5 May 2025 Sweden invited Finland to submit comments on the EIA report and permit application of the project Bothnia Offshore Lambda North in accordance with Articles 4 and 5 of the Espoo Convention. The Finnish Environment Institute responded on 8 August 2025 to the consultation request. The Finnish Environment Institute underlined the critical importance of



including the environmental impacts of Bothnia Offshore Lambda North in the upcoming EIA report for Lambda South.

The planned project

Project developer Lambda Offshore Wind AB is planning an offshore wind farm with a total capacity of 1,580 megawatts (MW) in the Bothnian Sea, off the coast of Hudiksvall, within Sweden's Exclusive Economic Zone. The project area is located approximately 150 kilometres from mainland Finland. The offshore wind farm will consist of up to 74 offshore wind turbines with a total height of up to 330 metres. The project's annual energy production will be approximately 6 terawatt hours (TWh). The depth in the project area varies between approximately 40 and 80 metres. The turbines will be connected via an internal cable network to one or more offshore substations, where the electricity will be converted and transmitted to the coast via one or more interconnection cables.

Consultation in Finland

According to the Finnish Act on Environmental Impact Assessment (252/2017), the Finnish Environment Institute is the competent authority and responsible for information and consultation tasks under the Espoo Convention.

The authorities and organisations that had previously issued statements were given the opportunity to comment on the supplementary consultation documents from 1 December 2025 to 9 January 2026.

Remarks received during the consultation

The following organisations responded to the enquiry: **Nature Resource Institute, Regional Council of Uusimaa, Ministry of Defence, Transport and Communications Agency Traficom and Economic Centre of Southwest Finland – Fisheries Authority** (previously Centre for Economic Development, Transport and the Environment of Southwest Finland – Fisheries Authority). However, none of these organisations provided any comments on the matter.

Consequently, the authorities or organisations that had previously submitted statements had no comments on the consultation documents.

Conclusions

The Finnish Environment Institute emphasises that all statements received during previous consultations, submitted on 26 April 2023 and 8 August 2025, should be taken fully into consideration when processing the permit, as well as when considering the monitoring plan for the Bothnia Offshore Lambda North project. In addition, The Finnish Environment Institute emphasises that EU member countries shall follow Directive 2011/92/EU of the European Parliament and of the Council, as amended by Directive 2014/52/EU.

The consultation documents indicate that the project developer considers that no further assessment of cumulative impacts is necessary. This consideration is based on the principle that cumulative impact assessments are not required for projects that are in the planning stage and have not yet been granted a permit.

On the contrary, the Finnish Environment Institute reminds that the Bothnia Offshore Lambda wind farm consists of two sub-areas: Lambda North and Lambda South. The Finnish

Environment Institute considers that an impact assessment considering the combination of impacts should be carried out for these two areas.

The Finnish Environment Institute bases its stand on the Commission notice regarding application of the Environmental Impact Assessment Directive to changes and extensions of projects (Official Journal of the European Union C 486/01, 3 December 2021). According to the Commission notice and based on the latest case law of the Court of Justice of the European Union, splitting projects is contrary to the purpose of the EIA Directive.

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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.

For information

Ministry for Foreign Affairs
Ministry of the Environment
Natural Resource Institute Finland
The Regional Council of Satakunta
Helsinki-Uusimaa Regional Council
The Finnish Heritage Agency
Ministry of Defence
The Finnish Safety and Chemicals Agency (Tukes)
Transport and Communications Agency Traficom
Metsähallitus
Finnish Fishermen's Association (SAKL)
Finnish Meteorological Institute
The Federation of Finnish Fisheries Associations
Finnish Supervisory Agency
Economic Development Centre of Southwest Finland