

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) of the planned Liivi Bay offshore wind park extension area**

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) of the Liivi Bay offshore wind park extension area.

### **Information on the planned project**

The developer Liivi Offshore OÜ plans to construct an additional offshore wind farm in the Gulf of Riga (Liivi Bay) next to the Liivi Bay offshore wind farm main area already under development. In 2020, Estonia notified Finland of the Liivi Bay main area wind park project. Despite not participating in the EIA procedure, Finland has requested to receive further information about the project. The planned extension area is located southeast, south and southwest of Kihnu Island and west of the Häädemeeste coast. Depending on the selected turbine capacity, up to 27 wind turbines are planned in the extension area. The maximum tip height of the turbines is up to 370 meters. The total planned area of the extension is 168,08 km<sup>2</sup>.

### **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 Ministry of Climate of Estonia requested an indication whether Finland intends to participate in the EIA procedure of the planned project, provide comments concerning the scope for the assessment of the environmental impacts of the project affecting Finland and submit comments from the public and the authorities in Finland.

The public and the authorities were given an opportunity to comment on the consultation documents from 22 May to 14 July 2026, which were available on the website of Finland's

environmental administration and platform by Ministry of Justice in Finland for requesting and submitting statements electronically (lausuntopalvelu.fi). Statements were also asked from relevant stakeholders.

## Remarks received during the consultation

The Finnish Environment Institute has prepared an English summary of the twelve (12) statements received in Finland. The full original statements in Finnish or Swedish, which are enclosed to this letter, include important and detailed remarks which need to be considered and taken into consideration in their entirety in the EIA procedure.

**The Finnish Supervisory Agency** has expressed its opinion that Finland should participate in the environmental impact assessment procedure for the expansion area of the Liivi Bay offshore wind farm in Estonia. The migration routes of bird and bat species migrating to Finland follow the coastlines of the Gulf of Finland. It is therefore possible that the project may have impacts on the populations of species that nest in Finland. Offshore wind power projects may also have far-reaching impacts on marine mammals, both during construction and while in operation. A very large number of offshore wind power projects are currently being planned in the coastal areas of the Baltic Sea. This makes it important—particularly for the integrity of the Baltic Sea's protected area network and especially the Natura 2000 network—that the impacts are comprehensively assessed in conjunction with other projects. Changes occurring in the Gulf of Riga may also affect the food web and water quality in the main basin of the Baltic Sea.

**YDHV lakitiimi “The YDHV Legal Team”** considers that the impact assessment report should comprehensively evaluate the project's effects on international maritime shipping routes, safety in exceptional situations, rescue and surveillance operations, and cumulative impacts together with other offshore wind farms. As several key technical aspects of the project remain undecided, including turbine type, unit capacity, foundation solutions, and export cable implementation, the report should clearly identify assessment uncertainties and assess a sufficiently broad range of alternatives. The team emphasizes that environmental impacts should not be assessed solely based on the project's most favourable implementation option. Meaningful participation by the Finnish authorities, researchers, organizations, and the public should be ensured through an adequate consultation period, access to key documents in Finnish and Swedish, and a clear presentation of impacts. The report should also be supplemented with studies on migratory birds, migratory bats, underwater noise modelling, impacts on fish stocks, marine mammals and maritime traffic, cumulative impacts, and assessment of uncertainties.

**The Federation of Finnish Fisheries Associations** states that Finland should participate in the project's EIA process. Their main concern are cumulative impacts the numerous offshore wind power projects in the Baltic Sea will have on fisheries, fish spawning grounds, and the migration routes of migratory fish. For example, migratory eels originating in Finland are known to migrate along the Estonian coast.

**Ålands Natur och Miljö r.f.** takes a positive view of the development of renewable energy sources. However, Ålands Natur och Miljö r.f. proposes that Finland should participate in the environmental impact assessment procedure. The project may have transboundary environmental impacts on, amongst other things, birds, bats, fish, marine mammals and water quality. Wind farms must not be built in locations that pose a threat to the Baltic Sea's already endangered seabird populations and other migratory birds, as well as other bird species. It must also be ensured that the siting of the wind farms does not in any way disturb or threaten the Baltic Sea's low populations of Baltic herring, migratory trout and/or other fish species, as well as aquatic organisms. From a nature conservation perspective, the wind farm could affect Åland, particularly with regard to migratory birds and bats. An extensive migratory bird route runs along the entire Baltic Sea coast in a north-south direction during spring and autumn. Further research is needed also on migrating bats. There are also migrating insects. It is also important, in an environmental impact assessment, to investigate in greater detail how various fish species in the area may be affected.

**The Ministry of Defence** has concluded that there are no national defence-related reasons to participate in the project's EIA process.

**The Finnish Border Guard** sees no need to participate in the project's EIA procedure regarding its statutory duties. Nor does the Border Guard have any comments regarding potential environmental impacts or the content of the consultation documents.

**The Government of Åland** states that as far as Åland is concerned, there is no need to participate in the environmental impact assessment procedure. No direct impacts are expected to arise for Åland due to the great distance.

**Finnish Transport and Communications Agency Traficom** and **The Finnish Safety and Chemicals Agency (Tukes)** do not consider it necessary, from the perspective of their own operations, to participate in the planned project's EIA procedure.

**Finnish Transport Infrastructure Agency, Helsinki-Uusimaa Regional Council** and **Regional Council of Southwest Finland** responded but did not provide any comments on the matter.

## Participation in the transboundary EIA procedure

Based on the statements received and its own deliberations, the Finnish Environment Institute states in accordance with Article 3, Paragraph 3 of the Espoo Convention that Finland intends to participate in the EIA procedure of the planned Liivi Bay offshore wind park extension area.

## Conclusions

The Finnish Environment Institute considers that it is important to examine and assess all the impacts mentioned in the statements. The transboundary impacts on Finland should be assessed in the EIA of the planned Liivi Bay offshore wind park extension area.

Concerns relate to impacts on migratory birds and bats, marine mammals, fish populations, fisheries, water quality, and ecological processes in the Baltic Sea. The location of the Liivi Bay offshore wind park extension area is quite far from Finland, but it lies along the Arctic migratory bird routes that pass near Finland, taking account that the project is fairly large-scale together with the original Liivi Bay offshore wind park, the special attention should be paid to the impacts on migratory bird and bat routes.

In the Environmental Impact Assessment (EIA) of the project, consideration must be given to the combined effects of the planned Liivi Bay offshore wind park extension area and the existing and planned wind farms in proximity. Several wind farm projects are planned near each other, and the possible cumulative impacts on migrating birds and bats, and marine ecosystems, must be assessed in the EIA. Furthermore, the possible cumulative impacts of planned land-use projects in the area should be assessed, in addition to wind power projects. It is essential to take security and safety points into consideration.

To conclude, the Finnish Environment Institute requires that the EIA documentation will provide a transboundary environmental impact assessment from Finland's perspective with a specific regard to the provided statements. Finland wishes to receive the EIA report or its summary translated into Finnish, and preferably also in English and Swedish, in the next phase of the EIA procedure. With regard to the Liivi Bay main area wind park project, Finland has expressed its desire to be informed on the potential Environmental Impact Assessment (EIA) documentation upon its publication.

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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.*

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Finnish Supervisory Agency  
Finnish Transport and Communications Agency Traficom  
Finnish Transport Infrastructure Agency  
Government of Åland  
Helsinki-Uusimaa Regional Council  
Regional Council of Southwest Finland  
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**Asiakirja: SYKE/2024/1886-19 Finland's response - OWF Liivi Bay wind park extension 17.7.2026**

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