

Authority Services

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Ministry of Climate
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Finland's response to the letter regarding the environmental impact assessment of the offshore windfarm in the Saare 2.1 and Saare 2.2 areas in Estonia

The Finnish Environment Institute acknowledges that Finland has received the letter dated 16 January 2025 and the consultation documents from Estonia regarding the environmental impact assessment (EIA) of the offshore windfarm in the Saare 2.1 and Saare 2.2 areas. The letter is based on the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention).

The developer Tuul Energy OÜ intends to construct an offshore windfarm in the Baltic Sea in two areas, Saare 2.1 and Saare 2.2. The project areas are located west from the Saaremaa coast. The planned windfarm will consist of up to 160 wind turbines with a total capacity of up to 2400 megawatts (MW). The planned maximum power of one wind turbine is up to 25 MW, and the maximum height above sea level is up to 365 metres. The total planned area of the Saare 2.1 and Saare 2.2 is 252.3 square kilometres.

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 an indication whether Finland intends to participate in the EIA procedure of the offshore windfarm in the Saare 2.1 and Saare 2.2 areas, comments and proposals regarding the assessment of the environmental impacts of the project in Finland, and comments from the public and authorities in Finland regarding the EIA programme.

The public and the authorities were given the opportunity to comment on the consultation documents from 23 January to 5 March 2025, which were available on the website of Finland's environmental administration and on the website of 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 12 statements received in Finland. 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 in the EIA.

Metsähallitus

Metsähallitus states that the EIA programme as a whole is comprehensive and takes into account the key environmental impacts of the project. Several additional studies are required to support the assessment report, which will significantly improve the knowledge base of the final evaluation.

The project may have transboundary impacts in Finland, both for birds and bats. The site is located on an important migration route for Arctic waterbirds and waders from southern Sweden to the mouth of the Gulf of Finland. Shallow parts of the area may also be important as wintering areas for waterbirds nesting in Finland. According to the assessment programme, at least the little gull (*Hydrocoloeus minutus*) has been observed in the area. This species is listed in Annex 1 of the Birds Directive as a species whose habitat must be protected by specific measures. Metsähallitus believes that the additional surveys required by the StUK4 method in the assessment programme are sufficient to determine the importance of the area for birdlife.

The proposed windfarm is located in an area that may be important as a migration route for bats. Among the species found in Finland, at least the Nathusius' Pipistrelle (*Pipistrellus nathusii*) may be of concern, as it is known to migrate long distances as far as central Europe. Nathusius' Pipistrelle (*Pipistrellus nathusii*) is classified as endangered and requires strict protection by the European Union. The assessment programme requires acoustic monitoring of bats at sea, which can be used to clarify the importance of the area for bats.

Based on the above, Metsähallitus views that Finland should follow the development of the project and participate in the EIA procedure.

Natural Resources Institute Finland

Natural Resources Institute Finland believes that it would be justified for Finland to participate in the EIA procedure for the project.

A large offshore windfarm is planned to the south-west and west of Saaremaa, with around 160 turbines. In spring and autumn, the area around Saaremaa is an important migration route for waterbirds, geese and waders nesting in the Russian Arctic tundra. The migration route continues to the Gulf of Finland, especially in spring, close to the Finnish coast. The Saaremaa area may also be an important area for "Arctic species", that nest in Finland, such as the Velvet Scoter (*Melanitta fusca*), Common Scoter (*Melanitta nigra*), Long-tailed Duck (*Clangula hyemalis*) and Divers (*Gaviidae*). Important migration routes for Common Cranes (*Grus grus*), which nest in Finland, may also pass through the area. The risks of observable population-level effects on the above-mentioned species would result not so much from the effects of individual windfarms but from the cumulative effects of several windfarms, which should be given sufficient attention in the EIA.

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

Centre for Economic Development, Transport, and the Environment of Southwest Finland views that Finland should participate in the EIA procedure for the planned project.



From Finland's perspective, the most significant environmental impacts of the project are likely to be on bat species and birds migrating through the area, fish, marine mammals and the Baltic Sea nature conservation network, in particular through the Baltic Sea Natura network.

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

- Fisheries Authority

The Fisheries Authority views that Finland should participate in the EIA procedure for the project. Finland has fishing rights and established fishing activities in the vicinity of the project area, in the Estonian Exclusive Economic Zone (EEZ), in international waters. In addition, the fish stocks in the Baltic Sea are shared and fishing is regulated at the EU level. The environmental impacts of the project may also extend into the Finnish territorial waters.

The project area is located in Estonian territorial waters, where Finnish fishing vessels have no fishing rights. However, the border of the project area is very close to the international waters of the Estonian EEZ, where Finnish vessels have permanent trawling grounds. In accordance with Article 5(1) of Regulation (EU) No. 1380/2013 of the European Parliament and of the Council, Finnish fishing vessels have equal fishing rights in the Estonian EEZ.

The Fisheries Authority considers the fishing area adjacent to the project area to be of occasional importance for Finnish fisheries and security of supply. The project area itself is habitat to fish stocks that are important for the Finnish fishing industry, in particular Baltic herring (*Clupea harengus membras*), sprat (*Sprattus sprattus*) and salmon (*Salmo salar*). The project may affect fishing opportunities in the surrounding area by affecting the movements, growth and reproduction of fish. The project may also change the ecology of the species and thus affect Finnish fishing opportunities. This will particularly affect the movements of herring and sprat, as well as salmon feeding and spawning migration. It is possible that a large part of the Baltic Sea migrates through the project area. The operating windfarm with its cables can affect the migration of salmon and other fish, for example through electromagnetic fields. Pollutants and hazardous substances released into the sea during construction could end up in the catches of Finnish vessels.

The main currents in the Baltic Sea run directly from the project area towards the Finnish coast, so it is likely that sediment clouds and potential discharges during construction will be directly directed towards the Finnish coast and the Gulf of Finland, affecting coastal fishing in Finland and inshore fishing in the Gulf of Finland and the Archipelago Sea. In addition, potential operational discharges (lubricants, protective paints) and in particular large-scale discharges caused by accidents and sabotage (e.g. ship fuels or cargoes, transformer coolants) will threaten the Finnish nature and coastal fisheries through currents.

Overall, the programme was comprehensive and cumulative impacts were also taken into account. The explanations of the images and maps in the English version of the programme and the Finnish translation were not translated, and some of the explanations in Estonian were also inadequate.

The assessment programme only covers Estonian fisheries. Other EU countries also fish in international waters off the project area. The catches of Finnish fishing vessels in the ICES 28-2 statistical grid examined are about the same as those of Estonia. The trawling routes of the fishing vessels should be illustrated and the far-reaching effects of the project on the fishing activities of EU countries should be examined. Fisheries Authority notes that part of the catches of Finnish fishing vessels are unloaded in Estonia, which means that the economic impact may also be reflected in Estonia.



The Federation of Finnish Fisheries Associations

The Federation of Finnish Fisheries Associations views that Finland should participate in the EIA procedure of the project.

Many different offshore wind projects are planned across the Baltic Sea. Individual projects may significantly reduce fishing opportunities in a particular area and have a negative impact on the fisheries in that area. In addition, there are concerns about the combined effects of the several projects on fisheries, fish spawning grounds and migratory routes for migratory fish. For example, migratory eels from Finland are known to migrate along the Estonian coast. The Federation of Finnish Fisheries Associations views that too little attention has been paid to cumulative effects in the planning and permitting processes so far.

Finnish Transport and Communications Agency Traficom

From a maritime perspective, windfarms planned in the marine area may affect, among other things, the functionality of the traffic system, maritime radar and radio systems, and maritime safety, especially if the offshore wind farm is located, for example, close to maritime traffic areas.

The consultation document for the project does not provide detailed information on the location of the planned offshore wind farm in relation to the maritime traffic areas used by commercial shipping in the region. When planning windfarm in the Saare 2.1 and Saare 2.2 areas, it is important to consider and ensure the safety and smooth operation of international maritime traffic in the area.

Traficom views that it would be justified for Finland to participate in the EIA procedure for the planned project, as the project may also have an impact on maritime traffic to and from Finland, given the location of the project area.

Finnish Meteorological Institute

The project areas are located in shallow areas close to the coast. Therefore, the Finnish Meteorological Institute (FMI) considers that the project will not cause significant negative impact on FMI's marine measurements. FMI does not see the need to participate in the EIA process for physical marine research. However, it notes that the development of marine infrastructure also provides opportunities for improved marine monitoring and hopes that the project developer, together with other marine operators, will explore the possibility of cooperating and developing the Baltic Sea research and monitoring infrastructure in the project area.

FMI, together with other Baltic Sea coastal countries, operates free-drifting Argo buoys in the Baltic Sea as part of its monitoring of the state of the sea. In general, the construction of the windfarms can make it difficult to operate the buoys, as they can hit the windfarm structures and break if they drift into the windfarm areas.

The Government of Åland

For Åland, the Government of Åland views that it has no need to participate in the EIA procedure as the project is not expected to have a direct impact on Åland.



The Finnish Border Guard

The Finnish Border Guard, taking into account its statutory tasks and area of operation, considers that it has no need to EIA procedure of the offshore windfarm as the planned offshore windfarm is located Estonia, near the island of Saaremaa.

Regional Council of Uusimaa

The Regional Council of Uusimaa does not need to participate in the EIA process.

An opinion of a private person

I don't see it necessary for Finland to participate in the EIA process. It sounds as if Finland would also be a funder in this project. Finland cannot afford it but must concentrate on its own country's affairs.

Windfarms are a big scam: short lifespan, inefficient/vulnerable to weather changes, destroyer of the environment and nature, a real "green transition". Marine areas are on the route of migratory birds, including sea eagles, and these "meat grinders" are very destructive to birds.

Regional Council of Southwest Finland did not have any comment on the matter.

Participation in the transboundary EIA procedure

Based on the received statements and reflecting its own views, the Finnish Environment Institute states that Finland intends to participate in the transboundary EIA procedure of the offshore windfarm in the Saare 2.1 and Saare 2.2 areas in Estonia.

Conclusions

The Finnish Environment Institute considers that it is important to examine and assess all the impacts mentioned in the comments. Based on the response received during the consultation, the EIA programme is mainly comprehensive. The statements given focused on birds and bats as well as fish stocks and fisheries. They also addressed the transport of sediments and discharges, marine traffic and cumulative effects of the windfarm projects.

The project may have significant transboundary impacts, particularly on migratory bird and bat species as the migration routes of certain bird and bat species may intersect with the project area. The impact of the project on bird and bat species should be assessed in sufficient detail with appropriate nature surveys. Particular attention should be paid to migration routes and wintering areas. In addition, bird and bat species that are most vulnerable to wind power should be identified. Mitigation measures and compensation for adverse effects should also be considered.

The project may also have significant impacts on migratory fish populations due to its location. The impact on different fish species and their reproduction and migration should be assessed. It is necessary to carry out appropriate studies to assess the impact on fish. The impact of the project on Finnish fisheries should be assessed as well. The EIA documentation



should also include an assessment and modelling of the sediment transport from the project area during the construction.

The need to assess combined and cumulative effects has been recognised in the EIA document which the Finnish Environment Institute considers very important given the large number of windfarm projects along the Estonian coast and in the wider Baltic Sea. The cumulative effects of the different windfarm projects, especially on birds, bats and fish, should be assessed.

To conclude, the Finnish Environment Institute wishes that the EIA documentation will provide a transboundary environmental impact assessment from Finland's perspective with a specific regard for the provided statements to the extent possible.

Head of Services

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Point of Contact to the Espoo Convention

Wilma Poutanen

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



Appendices

Received statements in Finland

For information

Ministry of the Foreign Affairs
Ministry of the Environment
Metsähallitus
Natural Resources Institute Finland
Centre for Economic Development, Transport, and the Environment of Southwest Finland
Centre for Economic Development, Transport and the Environment of Southwest Finland - Fisheries Authority
The Federation of Finnish Fisheries Associations
Finnish Transport and Communications Agency Traficom
Finnish Meteorological Institute
The Finnish Border Guard
The Government of Åland
Regional Council of Southwest Finland
Regional Council of Uusimaa

