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Finland's response to the notification in accordance with Article 10 of the Protocol on Strategic Environmental Assessment to the Espoo Convention regarding amendments to the Maritime Spatial Plan of the Republic of Latvia

The Finnish Environment Institute acknowledges the receipt of the notification dated 23 March 2026 and the accompanying consultation documents from the republic of Latvia. The notification was sent in accordance with Article 10 of the Protocol on Strategic Environmental Assessment ((the SEA protocol) to the Convention on Environmental Impact Assessment in a Transboundary Context.

Latvia notified Finland of the commencement of amendments to the Maritime Spatial Plan for the Marine Inland Waters, Territorial Sea and Exclusive Economic Zone Waters of the Republic of Latvia. It has been identified that Estonia, Lithuania and Sweden may be directly affected by the implementation of the amendments. In addition, Latvia is informing the other Baltic Sea countries as a matter of good practice and regional cooperation.

Consultation in Finland

According to the Finnish Act on the Assessment of the Environmental Impact of Plans and Programmes of Authorities (200/2005, amendments 912/2022), the Finnish Environment Institute is the competent authority for consultation tasks related to SEA Protocol in Finland.

In its notification the State Environmental Service of the Republic of Latvia requested to indicate, whether Finland wishes to participate in the transboundary SEA procedure, and provide information on any potentially significant transboundary environmental effects that should be considered, to submit any relevant planning information or data that may contribute to the assessment, to submit any comments received from the public and inform about any technical details regarding the documentation form, requests for additional languages for the translation as well as requirements regarding public participation procedures.

The public and the authorities were given an opportunity to comment on the consultation documents from 27 March to 18 May 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 10 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 Ministry of the Environment considers it important for Finland to participate in the public consultation on Latvia's updated maritime spatial plan, as changes may have transboundary impacts. From Finland's perspective, key concerns relate to ecologically valuable marine areas and their interconnectedness, which affect the overall well-being of Baltic Sea ecosystems and species.

Offshore wind development may have transboundary impacts on migratory species such as fish and birds, with disruptions to fish migration routes potentially affecting livelihoods and regional development in Finland. In addition, Latvia shares responsibility with Finland and Sweden for the Baltic ringed seal (*Pusa hispida botnica*), whose range spans several sea areas.

The cumulative impacts of offshore wind power are particularly significant in a transboundary context. The Ministry of the Environment also emphasizes that the draft plan, environmental report, and supporting studies should be available in English to ensure accessibility.

Transport and Communications Agency Traficom states that maritime traffic to and from Finland also passes through or near the planning area. Traficom has expressed its opinion that Finland should participate in the environmental impact assessment procedure regarding amendments to Latvia's maritime spatial plan. The plan's land-use solutions and guidelines concerning the coordination of different land-use types may also be relevant, among other things, for international shipping in the area. Since there are similar needs in the northern Baltic Sea to coordinate the various uses of the marine area, participation would help the formation of a unified situational picture of maritime spatial planning in the Baltic Sea and related practices, as well as provide an opportunity to examine solutions for coordinating the various land use needs of different areas.

The Finnish Meteorological Institute notes that, while the impacts on Finland's maritime areas from the perspective of ocean physics, and the changes affecting the Institute's operations, are likely to be minor, Finland should participate in the SEA procedure and monitor Latvia's amendment process to ensure that the use of the Baltic Sea region will be as synergistic as possible and cumulative impacts can be managed.

The Åland society for Nature and Environment states that Finland should participate in the SEA procedure because anything that happens in the Baltic Sea region may also affect Finland's maritime area. It is therefore important to monitor the process to identify any potential transboundary effects of, for example, fishing, mining and the extraction of various minerals and substances, nutrient discharges and other emissions, migratory birds, seals, invasive species, climate change, cumulative effects of wind power and other forms of energy production, cross-border submarine cables and aquaculture.

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

Finnish Transport Infrastructure Agency responded that based on the information currently available, it has no comments on the matter from the perspective of maritime traffic and shipping lanes.

Ministry of Defense, Ministry of Social Affairs and Health, Finnish Safety and Chemicals Agency and the Federation of Finnish Fisheries Associations replied but did not have any comment on the matter.

Participation in the transboundary SEA procedure

Based on the received statements and reflecting its own views, the Finnish Environment Institute states that Finland intends to participate in the transboundary SEA procedure regarding amendments to the Maritime Spatial Plan of the Republic of Latvia. Finland hereby requests to receive the materials translated into English and summary also into Finnish.

Conclusions

The Finnish Environment Institute considers that it is important to examine and assess all the remarks mentioned in the comments. The statements highlighted the role and importance of cooperation and coordination around the Baltic Sea in maritime spatial planning.

It is important to note that the activities taking place in the Baltic Sea may have impacts on a wide geographical area. In the context of wind power, for instance, it is imperative to undertake a thorough assessment of the potential impacts also on bats¹ and migratory birds and fish.

To conclude, the Finnish Environment Institute requests that the strategic environmental assessment include an evaluation of transboundary impacts that may affect Finland.

¹ Bats and Wind Farms: The Role and Importance of the Baltic Sea Countries in the European Context of Power Transition and Biodiversity Conservation

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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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Government of Åland
Transport and Communications Agency Traficom
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