

Authority Services

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Finland’s response to the consultation of the national Swedish Marine Spatial Plans for the Gulf of Bothnia, the Baltic Sea and the Skagerrak/Kattegat

The Swedish Environmental Protection Agency notified neighboring countries and countries around the Baltic Sea on the draft revised Marine Spatial Plan (MSP) and the Strategic Environmental Assessment (SEA) for Sweden on the 28 November 2023. The notification was issued in accordance with Article 10 of the Protocol on Strategic Environmental Assessment (SEA) in a Transboundary Context (Espoo Convention). The consultation for the proposals for revised marine spatial plans took place from 28 November 2023 to 20 February 2024. Sweden received responses and feedback from Lithuania, Estonia, Latvia, Norway, Denmark, Poland, Germany, and Finland.

The Swedish Agency for Marine and Water Management (SWAM) has the responsibility for the marine spatial plan in Sweden and has received all statements during the consultation. SWAM is currently preparing the final drafts of Swedish marine spatial plans, which will be delivered to the Swedish Government by the end of December 2024. SWAM has now summarised the statements received in February 2024, has responded to feedback received from the participating countries and has summarised the changes in the marine spatial plans and the impact assessment.

The Finnish Environment Institute acknowledges that Finland has received an invitation to respond to the feedback and the changes made dated on 23 October 2024, concerning the Strategic Environmental Assessment (SEA) of the national Swedish Marine Spatial Plans for the Gulf of Bothnia, the Baltic Sea and the Skagerrak/Kattegat.

The Finnish Environment institute has invited all parties who submitted comments during the previous consultation round to familiarise themselves with the feedback received and the changes made, and to provide a response where necessary. During the consultation, the Finnish Environment Institute received responses from seven parties. The replies received have been translated into English and can be found below. Please note that the original comments are attached to this letter.



Comments and information received to be taken into consideration

Finnish Transport Infrastructure Agency

The designation of sufficiently wide maritime traffic zones in the marine spatial plan is one way of facilitating the coordination of future offshore wind energy production areas and maritime traffic. Although the Marine Spatial Planning cannot determine the protection distances between shipping routes and offshore wind energy production, it is already necessary to take into account at this stage that shipping in ice-covered sea areas will require more space than in open water. In addition, reconciling shipping and offshore wind power requires the possibility of sufficiently spacious shipping areas to allow for safe and efficient year-round operation of important shipping in the Gulf of Bothnia.

Furthermore, taking into account the specificities of navigation in ice-covered periods, such as the dispersion of traffic, the movement of icebreakers from one area to another, and the ice conditions of ships' navigational radars, is of paramount importance in the maritime spatial plan, both in relation to offshore wind farm construction and otherwise as well.

The most relevant geographical area for the Finnish Transport Infrastructure Agency is the outer edge of the Swedish Exclusive Economic Zone in the Gulf of Bothnia, as in some places the planned offshore wind farms border the outer edges of both the Finnish and Swedish Exclusive Economic Zones, affecting maritime traffic to both countries, especially during ice-covered periods.

Furthermore, the Finnish Transport Infrastructure Agency considers it important that Finland and Sweden examine the possibility of coordinating their maritime spatial plans, especially regarding shipping and offshore wind power, so that offshore wind power development in the Gulf of Bothnia can be coordinated with shipping in the most appropriate way possible.

Finnish Transport and Communications Agency Traficom

With regard to Sweden's responses to the feedback received from neighbouring countries, Traficom understands that it is not possible to define safety distances between maritime traffic areas and offshore wind farms in the Marine Spatial Plan, but stresses the importance of designating sufficiently wide maritime traffic zones in the marine spatial plans as a means of facilitating the coordination of future offshore wind projects with maritime traffic, as this will allow for more flexibility in the further development of offshore wind farm projects to take into account possible specific characteristics of the area (e.g. adequate safety distances). This way the areas of offshore wind farms identified in the marine spatial plans would reflect the best possible estimate of the suitable offshore wind farm area for the region.

When assessing the delineation of maritime transport routes - especially in the Bothnian Sea - it would be important to take into account the specificities of winter navigation and the higher space requirements for winter navigation compared to ice-free navigation. This is particularly important in the outer parts of the Finnish-Swedish Exclusive Economic Zone, where offshore wind farms have been planned and designated near the border on both sides of the border.

In a previous opinion, Traficom drew attention to the coherence and coordination between the Finnish and Swedish maritime spatial plans, regarding the coordination of maritime transport



and offshore wind farms.

As the marine spatial plans for both countries are now being updated at the same time, Traficom asks whether there has been an opportunity during the planning process to concretely review and coordinate the marine spatial plans under preparation between the two countries, regarding the areas allocated to energy production (offshore wind farms).

In both Sweden and Finland there is obvious pressure to allocate more areas for energy production in the Marine Spatial Plan. As already pointed out by Traficom in a previous opinion, coordinated planning would allow the cumulative effects of offshore wind farms on, for example, the shipping in the Gulf of Bothnia to be managed effectively. This would also serve the maritime transport of both countries, which have a mutual intergovernmental agreement on winter maritime cooperation.

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

The comments made by the Centre for Economic Development, Transport and the Environment of Southwest Finland in its previous opinion on 5 February 2024 have been sufficiently taken into account. The changes made, for example, regarding more detailed studies of the impact on birds, are apt and necessary. It is good to recognise that, in the light of uncertainties, further studies may be necessary.

The addition of a summary paragraph to present the overall environmental impacts will clarify the document. It also provides a good opportunity to create a coherent synthesis of impacts, where impacts that are otherwise disconnected in the text, can be described. This is also appropriate for the impact assessment and reduces the risk that the cumulative effect of separate natural effects is not taken into account in the assessment.

The Government of Åland

The Government of Åland has nothing further to say about Sweden's response to the feedback and the changes made to the maritime spatial plans and impact assessments. The Government of Åland would like to express its appreciation for the professional and benevolent response to our previous statement. The response has been carefully and clearly addressed, which we consider to be very valuable for the continuation of the process.

Ministry of transport and communications

The Ministry of Transport and Communications has no comment on the responses.

Natural Resources Institute Finland

The Natural Resources Institute Finland has no comment on the matter.

Centre for Economic Development, Transport and the Environment of Lapland

The Lapland ELY Centre has no comments on the matter referred to in the title.



Conclusion

The Finnish Environment Institute wishes to express its appreciation to the Swedish Agency for Marine and Water Management (SWAM) for the well-prepared and clear feedback. The response was carefully and clearly addressed, which we consider to be very valuable for the continuation of the process.

Both Finland and Sweden are under pressure to include new energy production areas in their maritime plans. This development poses challenges for other uses of the sea area and, according to the feedback, should be taken into account, especially in fairway planning and winter navigation safety.

The coherence and coordination between the Finnish and Swedish maritime spatial plans, regarding the coordination of maritime transport and offshore wind farms is found to be very important especially in the Gulf of Bothnia. To achieve this, there must be sufficient contacts between the countries, through informal and formal forums for discussion and information exchange.

Head of Services

Jenni Juslén

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

Ulla Helminen

This document has been electronically signed.

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Ministry of the Environment
Ministry of Transport and Communications
Government of Åland (Ålands landskapsregering)
Centre for Economic Development, Transport and the
Environment of Lapland
Centre for Economic Development, Transport and the
Environment of Southwest Finland
Finnish Transport Infrastructure Agency
Finnish Transport and Communications Agency (Traficom)
Natural Resources Institute Finland (Luke)

