

Authority services

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Swedish Environmental Protection Agency
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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) regarding the planned offshore wind farm "Aurum" in Sweden's territorial waters in the Bothnian Sea

The Finnish Environment Institute hereby acknowledges that Finland has received the notification, dated 7 June 2023, and the consultation documents from Sweden. The notification is based on Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) and it concerned an environmental impact assessment (EIA) procedure of the planned offshore wind farm "Aurum" (hereinafter "**the Project**"), in Sweden's territorial waters in the Bothnian Sea.

Aurum Offshore AB (part of Eolus Vind AB) plans to apply for a permit to construct an offshore wind farm approximately 3 kilometres from the municipalities of Robertsfors and Skellefteå in the county of Västerbotten, Sweden. The project area is divided into two areas. The northern project area is approximately 152 square kilometres and the southern is approximately 198 square kilometres. Within these two areas, the developer plans up to 147 wind turbines with a maximum total height of 365 metres. The installed power is estimated to be about 2 200 megawatts (MW), which would annually generate about 8,4 terawatt-hours (TWh).

Consultation in Finland

According to the Act on Environmental Impact Assessment (252/2017), the Finnish Environment Institute is the competent authority and responsible for consultation tasks under the Espoo Convention. The Swedish Environmental Protection Agency requested an indication whether Finland intends to participate in the EIA procedure, comments on the scope of the environment impact assessment, and any other comments from the public and others concerned in Finland.

The public and the authorities were given an opportunity to comment on the consultation documents from 12 June to 16 August 2023. The consultation documents were available, and statements were asked on the website of Finland's environmental administration and on the website of electronic public consultation. The Finnish Environment Institute received total 10 statements from the following authorities and expert organisations: the Regional Council of



Southwest Finland, the Finnish Transport Infrastructure Agency (Väylävirasto), the BirdLife Finland, the Centre for Economic Development, Transport and the Environment (ELY Centre) for South Ostrobothnia, the Finnish Meteorological Institute (FMI), the Ministry of Transport and Communications, the Centre for Economic Development, Transport and the Environment (ELY Centre) for Southwest Finland, the Finnish MSP Cooperation Group, the Finnish Fishermen's Association (SAKL), and the Finnish Transport and Communications Agency (Traficom).

Participation in the EIA procedure

Based on the received statements and reflecting its own views, the Finnish Environment Institute informs that Finland will participate in the EIA procedure of the Project. The majority of respondents expressed the view that Finland should participate in the procedure. Finland notes that number of offshore wind farm projects in the Gulf of Bothnia, the Bothnian Bay, the Bothnian Sea and the Baltic Sea has increased both in the sea areas of Sweden and Finland. The Finnish Environment Institute notes that the consultation documents do not currently present transboundary environmental impacts from Finland's perspective at sufficient level. In this respect, the Finnish Environment Institute wishes that the EIA documentation will provide a clear transboundary environmental impact assessment from Finland's perspective with a specific regard for the provided statements to the extend as possible. All contributing factors should be known and their impacts assessed to ensure that the decision on the implementation of the Project is based on firm knowledge of its impacts and on the best possible solution.

Remarks received during the consultation

The Finnish Environment Institute has made a summary of the received statements in Finland. The original statements, 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.

The Regional Council of Southwest Finland has no remarks, as the Project does not conflict with its regional land use planning or other planning.

The Finnish Transport Infrastructure Agency (Väylävirasto) considers that the Project is located in an area which is not relevant for maritime transport to Finland or has no impact on operational activities of winter navigation.

The BirdLife Finland stresses the precautionary principle and international responsibility to leave the concentration areas of the main migration routes of birds free of wind power. BirdLife Finland notes that the Project may have significant adverse impacts on birds in Finland and considers it important that bird surveys are carried out in accordance with the standard developed in Germany. The EIA should conduct a thorough assessment of the bird and habitat impacts individually and in combination with other projects impacting on the surrounding area.

The ELY Centre for South Ostrobothnia notes that e.g., impacts on migratory birds, and the magnitude and quality of the impacts on fisheries may concern Finland. The assessment of impacts on migratory birds should take into consideration cumulative impacts of different wind projects. The consultation document does not identify potential transboundary impacts on water bodies, and potential impacts on the Finnish EEZ and territorial waters should be examined. The assessment should take into consideration planned offshore wind projects in Finland, to the extent that information is available. Potentially harmful substances and nutrients in the sediment must be identified and the risk and effects of their dispersion must be assessed. The impacts on



food webs in the area and the impacts on seawater currents and waves and their indirect impacts on water quality should be addressed.

The Finnish Meteorological Institute (FMI) states that the Project will have an impact on carrying out marine observations in the area. It is possible that the Argo buoys used in the Bothnian Bay will drift into the planned area. FMI considers it necessary that marine measurements that affect the monitoring of the Baltic Sea can also be carried out after the Project is constructed. FMI notes that the Project will also have impacts on e.g., wave and current conditions. The extent of these impacts and their possible consequences on sedimentation and marine ecosystem and impacts on ice cover should be assessed.

The Ministry of Transport and Communications notes that taking into consideration the location of the project area and other offshore wind projects planned in the area, the projects may have impacts on navigation (e.g., traffic routes, fuel consumption, radar reflection effects, commercial navigation, and winter navigation). The potential cumulative impacts of offshore wind projects on navigation in the Kvarken region should be fully investigated in the further planning. In addition, the Ministry of Transport and Communications highlights that it is important to consider the routes used outside the established fairways and routing systems.

The ELY Centre for Southwest Finland (fishery authority) notes that Finland and the counties represented by the ELY Centre for Southwest Finland have fish interests in the Gulf of Bothnia, which will potentially be affected by the Project, and stresses the need to avoid the Project's far-reaching impacts. The ELY Centre for Southwest Finland provides a detailed statement proving issues which need to be thoroughly investigated, such as impacts on fish stocks and offshore fisheries, risks to marine ecology, and matters related to discharges. The consultation document contains several false or outdated arguments about fish and other species in the project area and the Bothnian Bay.

The Finnish MSP Cooperation Group considers that closer cooperation between authorities and experts is needed to support a managed offshore wind energy development in the Gulf of Bothnia and to assess the overall impact. The assessment should take into consideration cumulative impacts of wind farms planned both in the marine areas of Sweden and Finland. The Finnish MSP Cooperation Group draws attention to the following points which may potentially impact on Finland: birds, fish stocks (including migratory fish), bats and ringed seal, navigation, and ice conditions.

The Finnish Fishermen's Association (SAKL) notes that the Bothnian Sea, the Bothnian Bay and the northern parts of the main basin of the Baltic Sea are important for Finland's fishing industry. The Project's impacts on fisheries in the southern Bothnian Bay, and more widely, need to be thoroughly investigated and the information obtained critically examined. The cumulative impacts of the Project with other planned projects should be investigated.

The Finnish Transport and Communications Agency (Traficom) views that the Project's location and other offshore wind projects planned in the Kvarken region may have impacts on navigation. It is important to take into consideration navigation routes also beyond the established fairways and routing systems, and winter navigation aspects. The potential combined impacts of offshore wind projects on navigation in the Kvarken region should be investigated in the further planning.



Head of authority services

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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.

Appendices	Received statements in Finland
Distribution	Swedish Environmental Protection Agency, Richard Kristoffersson
For information	Ministry for the Foreign Affairs of Finland Ministry of the Environment Regional Council of Southwest Finland Finnish Transport Infrastructure Agency (Väylävirasto) BirdLife Finland Ministry of Transport and Communications ELY Centre for South Ostrobothnia Finnish Meteorological Institute (FMI) ELY Centre for Southwest Finland Finnish MSP Cooperation Group Finnish Fishermen's Association (SAKL) Finnish Transport and Communications Agency (Traficom)

