Suomen ympäristökeskus
Finlands miljöcentral
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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 project "Baltica-1" in Poland's exclusive economic zone in the Baltic Sea

The Finnish Environment Institute hereby acknowledges that Finland has received the notification, dated 11 October 2023, and the consultation documents from Poland in accordance with Article 3(1) of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) regarding an environmental impact assessment (EIA) procedure of the planned offshore wind farm project "Baltica-1" in Poland's exclusive economic zone (EEZ) in the Baltic Sea.

Elektrownia Wiatrowa Baltica-1 Sp. z o.o. plans to establish the project on the eastern side of the Central Shoal area, approximately 75 kilometres north of the shoreline at the level of the Municipalities of Smołdzino and Łeba (Pomorskie Voivodeship). The project area covers approximately 85 square kilometres and the project is estimated to consist of a maximum of 60 wind turbines with a maximum height of 310 meters. The expected installed capacity is estimated to be 900 MW.

Consultation in Finland

According to the Act on Environmental Impact Assessment Procedure (252/2017), the Finnish Environment Institute is the competent authority and responsible for consultation tasks under the Espoo Convention. The General Directorate for Environmental Protection requested an

indication whether Finland intends to participate in the EIA procedure and to deliver Finland's position on the scope of the environmental impact report. The public and authorities were given the opportunity to comment on the consultation documents from 30 October to 17 November 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.

Participation in the EIA procedure

Based on the received statements and reflecting its own views, the Finnish Environment Institute states in accordance with Article 3(3) of the Espoo Convention that Finland intends to participate in the EIA procedure.

Remarks received during the consultation

The Finnish Environment Institute notes that planning of offshore wind farms has increased in the Baltic Sea region which has raised concerns about the need for an overall assessment. 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. As cumulative impacts of several wind farms can potentially be ecologically significant, it is considered important to examine and assess cumulative impacts as widely as possible. The EIA documentation should address transboundary impacts from Finland's perspective.

The Finnish Environment Institute notes that the planned area is located close to the most important shoals where long-tailed ducks spend their winters (Hoburgs Bank and Midsjö Bank). The shoals are used by hundreds of thousands of long-tailed ducks with nesting places in Northern Russia and in Scandinavia. According to a study conducted in 2011 about 20% of the long-tailed ducks wintering in the Baltic Sea stay in these shoals. The exact nesting areas of birds that make use of the area are not known, but it is likely that they are mostly a population that nests in Northern Russia using Finland as a migration route. The long-tailed duck population nesting in Finland comprises 1,500-2,000 pairs. The migratory route for this population that nests in Lapland and its areas for wintering are not known, but it has been assumed that the birds migrate via the Gulf of Bothnia to the southern Baltic Sea. Wind power installations can significantly affect Finland's long-tailed duck population.

The Finnish Environment Institute has prepared a summary of the original statements. The original statements, which are enclosed to this letter, include detailed remarks which should be taken into account in the EIA. Most of the statements indicate that Finland's participation in the EIA procedure is important. The statements stress the impacts especially on migratory birds and fisheries and raise concerns about cumulative impacts in the Baltic Sea region. It is considered important to receive more information on assessments regarding, for example, birds, fisheries and flows. The statements also provide information on other assessments which should be carried during the EIA.

The Finnish Transport and Communications Agency Traficom has no comments regarding the matter.

The Government of Åland states that based on the far distance to Åland's waters significant direct impacts on Åland are unlikely.

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The Centre for Economic Development, Transport and the Environment of Southwest Finland (ELY Centre of Southwest Finland) states that in addition to the impacts that wind power has on the area, the assessment needs to consider the cumulative impacts. Possible ways of mitigating the negative impacts and the possible ways of compensating the impacts that emerge in the Baltic Sea area need to be examined and evaluated. The possible environmental impacts of the project might impact on Finland through the birds. The consultation document draws attention to the inadequate knowledge of the migratory strategies and migratory routes of sea birds in the Baltic Sea. This puts a special emphasis on the need for monitoring migratory bird and special attention should be paid how wind power plants and migratory routes overlap, and to evaluate the significance of the effects. It is also important to identify the areas where birds rest and eat during migration, and to identify the species that are the most sensitive to the effects of wind power. As for cables, it is also important to identify and assess what kinds of marine habitats and bottom fauna exist in the area and to evaluate the effects of the project and their significance. Radar is to be utilised for assessing bird populations to determine their migratory routes and the altitudes at which they fly. It is considered good to include studies how bats and sea mammals are affected.

The Fisheries Authority of the ELY Centre of Southwest Finland (Fisheries Authority) notes that Finland holds fishing rights in the project area and its vicinity, and the fish populations of the Baltic Sea and the Gulf of Bothnia are shared. The project area and its cable connections could permanently impede or encumber Finnish vessels from trawling or using fishnets to catch fish. The shoals in the area may be important spawning grounds and habitats for both young and mature fish caught commercially and environmental changes that occur there could also be reflected in the fish populations in a wider area. The greatest of the environmental effects on fisheries are likely to occur in the construction phase. All of the impacts need to be evaluated from the point of view of cumulative impact on the Baltic Sea as a whole. The consultation document has been mostly well drafted, and key issues concerning the water environment have been considered, but the quality of the Finnish translation is poor, and the content is inadequate and also partly misleading. The research plans appear to be diverse, but from the point of view of fishing it would be important to study the significance of the area as a spawning ground for species that are caught commercially, if the planned ichthyoplankton studies are not sufficient for this purpose. The trawling channels need to be mapped out. The positive and negative impacts of a planned ban on fishing on the fish population and on fishing should be evaluated. The fishing activities of other EU countries should be considered in this connection.

The Finnish Meteorological Institute (FMI) uses freely drifting buoys to make observations. The southernmost observations are made in the Eastern Gotland Basin, which is relatively far from the project area. The project impacts the flow field in the sea owing to changes in wind, and to a lesser degree, to the foundations. The project is planned near the Stolpe Furrow channel connecting the Bornholm Basin in the Baltic Sea and the Eastern Gotland Basin, which brings salty and oxygen-rich water northward from the Atlantic along the sea bottom. Changes in flows near the sea bottom are probably unlikely, but because the effect of the changes would also be great further north, FMI considers that changes in the flows should be investigated. FMI has no comments on matters related to the weather radar network.

The Finnish Transport Infrastructure Agency considers that the project does not directly impact on navigation in Finland.

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The Finnish Wildlife Agency stresses especially the impacts on birds, but also raises concerns for ringed seal. The permanent obstacles to bird migration should be taken more extensively into consideration in planning. Particular importance should be given to an overall national review of offshore wind power, which should be part of an international review. The statement includes several maps presenting routes of migratory birds and links to several guidelines related to birds.

The Ministry of Transport and Communications has no comments on the consultation documents but considers it reasonable to follow the procedure.

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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

For information
Ministry for the Foreign Affairs of Finland
Ministry of the Environment
Finnish Transport and Communications Agency Traficom
Government of Åland
ELY Centre of Southwest Finland
Finnish Meteorological Institute (FMI)
Finnish Transport Infrastructure Agency
Finnish Wildlife Agency
Ministry of Transport and Communications

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