

Authority Services

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Espoo Convention Focal Point
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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) for the planned Offshore Wind Farm Baltica-1+ in Poland's exclusive economic zone

The Finnish Environment Institute acknowledges that Finland has received the notification dated 16 January 2024 and the consultation documents from Poland. The notification is based on Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) and Article 7 of the Directive 2011/92/EU and concerns an environmental impact assessment (EIA) procedure of the planned offshore wind farm, "Baltica-1+", in the Baltic Sea in Poland's exclusive economic zone (EEZ).

The developer, Elektownia Wiatrowa Baltica -1 Sp. z o.o, is planning an offshore wind farm with a maximum total capacity of 1185 megawatts (MW) in the in the north-central part of the Polish EEZ. The project area is approximately 131.2 square kilometres, and the estimated built-up area of this offshore wind farm is approximately 115.5 square kilometres. The project comprises a number of offshore wind turbines with a unit capacity of 15–25 MW. The distance of the project area from the border of Sweden's economic zone is 2 km, Denmark's 73 km, Russia's 78 km, Lithuania's 86 km, Latvia's 94 km, and Germany's 214 km. The project may cause significant adverse transboundary environmental impacts. Possible effects may affect e.g., marine mammals and fish.

Consultation in Finland

According to the amended Finnish Act on Environmental Impact Assessment (252/2017), the Finnish Environment Institute is the competent authority and responsible for information and consultation tasks under the Espoo Convention. The General Directorate for Environmental Protection in Poland requested an indication whether Finland intends to participate in the EIA procedure of the Project, comments concerning the scope for the assessment of the environmental impacts of the Project in Finland, and comments from the public in Finland.



The public and the authorities were given the opportunity to comment on the consultation document from 6 February to 6 March 2024, which was available on the website of Finland's environmental administration and on the website of lausuntopalvelu.fi. Statements were also asked from relevant stakeholders.

Participation in the transboundary 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 transboundary EIA procedure of Baltica-1+ (Poland).

Remarks received during the consultation

The Finnish Environment Institute has made an English summary of the 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.

The Finnish Meteorological Institute

With regard to physical oceanography, the Finnish Meteorological Institute states the following: Baltica-1+ is being built near the Stolpe Furrow canal connecting the Borholm basin in the Baltic Sea and the eastern Gotland basin, through which salty and oxygen-rich water from the Atlantic flows northwards at the bottom. As changes in these bottom flows would have an impact on the entire main basin of the Baltic Sea and the Gulf of Finland, the Finnish Meteorological Institute considers that changes in flows should be investigated in an environmental impact assessment (EIA) and that Finland should participate in the EIA procedure. Now, the Finnish Meteorological Institute considers that the plan for measuring the physical state of the sea in the area is comprehensive, but the Finnish Meteorological Institute recommends that more extensive hydrodynamic modelling be carried out in the area to determine the possible effects (caused by wind changes and turbulence caused by foundations) on bottom flows.

Regarding the weather radar network, the Finnish Meteorological Institute has no comments on Finland's need to participate in the environmental impact assessment procedure for the Baltica - 1+ offshore wind farm planned for Poland's exclusive economic zone, as the area is more than 20 km away from the nearest weather radar of the plant.

The Centre for Economic Development, Transport, and the Environment of Southwest Finland states that it is necessary for Finland to participate in the EIA procedure of the project.

A large number of separate offshore wind power projects are planned for the Baltic Sea region. The Centre for Economic Development, Transport, and the Environment of Southwest Finland considers that, especially considering the combined effects of these projects, it cannot be ruled out that the project in question, in synergy with others, would not cause significant cross-border environmental impacts on, for example, migratory birds, fish and marine mammals. Four different offshore wind farms are planned in the vicinity of the project. All these planned wind farms may host important bird migration routes.

The ELY Centre has familiarised itself with the consultation document corresponding to the project's EIA programme. The ELY Centre notes that the Finnish translation of the consultation document is partly difficult to understand. The ELY Centre considers that the project's alternative analysis should consider the large size of the project and the planned number of



turbines. There is not much difference between the options now envisaged, given that the project is, in any case, large in scope. The potential cross-border impacts of the project have been identified, but synergies with other projects should be considered more broadly. Based on the consultation document, some of the bird surveys, for example, have been carried out between 2022 and 2023. However, the consultation document has not presented any results in this regard. The ELY Centre also states that the mitigation of impacts on such large offshore wind farms should be examined particularly carefully. It is also hoped that, in terms of ensuring synergies, the projects will plan joint monitoring of environmental impacts.

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

In the view of the Fisheries Authority of the Centre for Economic Development, Transport and the Environment of Southwest Finland, Finland should participate in the EIA procedure of the Baltica-1+ project in the future. Finland has fishing rights in the project area and its neighbouring areas, in the commercial waters of Poland and Sweden. The fish stocks in the Baltic Sea and the Gulf of Bothnia are shared, and fisheries are regulated at EU level.

The planned wind power area and its cable connections may permanently prevent or hinder trawl and net fishing by Finnish vessels. According to Article 5 of Regulation (EU) 1380/2013 of the European Parliament and of the Council, the Finnish vessels have fishing rights in Poland's exclusive economic zone where the project is located. Fishing by Finnish vessels in the area has declined in recent years, but the Fisheries Authority considers it likely that Finnish vessels will return to the area. The impact of power plants and their structures on fishing is permanent and may continue even after dismantling the infrastructure, i.e., after their life cycle.

The shallows in the planning area can be significant spawning, juvenile and habitat areas for economically important fish species, and environmental changes there may also be reflected in fish stocks in a wider area. The effects of this project may be amplified due to the combined effects, as a seabed mining area has been reserved next to the project area, and three other wind power areas are planned to the west and north-west of the project area, in the domestic waters of Poland and Sweden. Significant effects on wide-area hydrology and physicochemical conditions are likely. In addition, natural gas production is being developed nearby. The greatest impact on fisheries is likely to materialise during the construction phase.

In general, the document is well drafted, and the key issues concerning the aquatic environment have been considered. The quality of the Finnish translation is poor, the content is incomplete and partly misleading. The research plans seem diverse, but from the point of view of fisheries it would be important to study the importance of the area as a spawning ground for economically important species if the planned ichthyoplankton surveys are not sufficient for this purpose. Mapping of trawling corridors is also necessary to reduce the project's impact on fisheries. The positive and negative effects of the proposed closure on fish stocks and fisheries should be assessed. This should also take into account fishing activities in other EU countries. The Fisheries Authority points out that the percentages given in the document for the total fishing volume in Polish waters may be misleading. The fishing impact of the project is likely to be wider than the production area, and export cables, in particular, may affect fisheries in a very large area.

This project is one of several projects that may be carried out simultaneously in the Baltic Sea region. The impacts of significant projects alone can multiply and permanently change the marine environment. For this reason, all impacts must also be assessed in terms of synergies at Baltic Sea level. This aspect has not been sufficiently considered.



The Federation of Finnish Fisheries Associations is grateful for the opportunity to comment and considers that Finland should participate in the EIA procedure for the project. Many different offshore wind power projects are being planned throughout the Baltic Sea. Individual projects can significantly limit fishing opportunities in each area and have a negative impact on the fish stock in that area. In addition, the combined effects of numerous projects on fish stocks, fish spawning grounds and migratory fish migration routes are a cause for concern. In our opinion, too little attention has so far been paid to synergies in the planning and permitting processes.

The Ministry of Transport and Communications

The Ministry of Transport and Communications has no comments to make on the notification or consultation document, but it would be justified to be able to follow the process also in the future. From Finland's point of view, it would be useful to obtain more information on, for example, the studies and practices used to support planning, especially when coordinating shipping and offshore wind power.

Finnish Transport and Communications Agency (Traficom)

The planned Baltica-1+ offshore wind farm will be located at a distance from the main traffic routes used by maritime traffic to and from Finland in the southern Baltic Sea, which is why Traficom considers that it has no reason to participate in the environmental impact assessment procedure for the project.

Metsähallitus

Metsähallitus would like to thank for the opportunity to comment on Finland's need to participate in the environmental impact assessment procedure for the Baltica-1+ offshore wind farm planned for Poland's exclusive economic zone. Our experts have studied the project and have concluded that there is no need for us to comment on the matter.

The Regional Council of Southwest Finland

The Regional Council of Southwest Finland will not issue a statement on the following requests for statements because: the union has no objections to them, and they do not conflict with Southwest Finland with regional planning or other planning:

The Government of Åland

The regional government decided not to issue a statement. At an earlier stage, the regional government has given a statement that it is not necessary for Åland to participate in the procedure of the environmental impact assessment for Baltica -1.

Conclusions

Finland considers that it is important to examine and assess cumulative impacts to the extend possible in the EIA. Although impact can be minor or ecologically non-significant for an individual wind farm, cumulative impacts of several wind farms in the region can be ecologically significant. The Finnish Environment Institute wishes that the EIA documentation will provide an environmental impact assessment from Finland's perspective with a specific regard for the provided statements to the extend as possible. Further, the Finnish Environment Institute expects the EIA documentation to be provided also in Finnish and that a reasonable time for the consultation is given.



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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
- The Finnish Meteorological Institute
- ELY Centre of Southwest Finland
- ELY Centre of Southwest of Finland - Fisheries Authority
- The Federation of Finnish Fisheries Associations
- Ministry of Transport and Communications
- Finnish Transport and Communications Agency
- Metsähallitus
- The Regional Council of Southwest Finland
- The Government of Åland

