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Finlands miljöcentral
Finnish Environment Institute

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Swedish Environmental Protection Agency
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Finland's response to the supplementary 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 project "Skidbladner" in Sweden's exclusive economic zone

The Finnish Environment Institute hereby acknowledges that Finland has received the supplementary notification, dated 5 December 2023. The supplementary notification is based on Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention), and it concerns an environmental impact assessment (EIA) procedure of the planned offshore wind farm project, "Skidbladner", in the Baltic Sea in Sweden's exclusive economic zone (EEZ). Finland received the first notification regarding the matter on 5 April 2023, and the Finnish Environment Institute indicated in its letter, dated 16 May 2023, that Finland will participate in the EIA procedure. Previously Simply Blue Group AB planned that the project consists of a maximum of 111 wind turbines. Now, the developer would like to supplement prior scoping document, with an increased number of turbines. No changes to the project area are planned. The number has now been adjusted to a maximum of 147 wind turbines, with an unchanged maximum total height of 360 metres. The supplementary consultation concerns the changes in the amended scoping document.

Consultation in Finland

According to the Finnish Act on Environmental Impact Assessment Procedure (252/2017), the Finnish Environment Institute is the competent authority and responsible for information and consultation tasks related to the Espoo Convention. The Swedish Environmental Protection Agency requested comments concerning the scope for the assessment of the environmental impacts of the present changes of the project and any comments from the public in Finland. The public and authorities were given the opportunity to comment on the supplementary consultation documents from 14 December 2023 to 23 January 2024. 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 five statements.

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Remarks received during the consultation

Based on the received statements and its own views, the Finnish Environment Institute states that Finland will continue participating in the EIA procedure. The Finnish Environment Institute's previous statement must be considered in further planning. The original statements, which are given during the supplementary consultation and are enclosed to this letter, need be considered fully in the EIA. In addition, the previously given statements should be taken into consideration as well. The Finnish Environment Institute has prepared a summary of the original statements.

In its statement, **the Finnish Meteorological Institute (FMI)** refers to its previous statement, dated 10 May 2023. FMI states that the project impacts marine observations in the area and makes it especially difficult to carry out autonomous observations, and also observations from a vessel in the vicinity of the project. FMI does not currently carry out autonomous measurements in the area. Measurements have been carried out in the vicinity. It is possible that Argo buoys, used in the Gotland Deep and the northern parts of the main basin, drift into the project area. The project may complicate the use of autonomous surveying equipment when the project is constructed. FMI states that the project has an impact on wind conditions and, consequently, on wave, current and sea conditions. The extent of these impacts and their possible consequences for sedimentation and the marine ecosystem should be examined. FMI has no comments on the weather radar network.

The Finnish Transport and Communications Agency (Traficom) refers to its previous statement, dated 8 May 2023. In addition to its previous statement, Traficom states that the planning of the area for wind turbines and the location of individual wind turbine structures must consider the use of radar as the main navigation and collision avoidance tool for vessels and its key role in winter navigation and traffic management. The assessment should consider the exceptional use of vessels' radars in icy conditions. Wind turbines can cause either shadowing or reflection effects on radars, which in the worst case make it difficult to interpret radar signals. Wind farms can also impact the vessels satellite positioning (the Global Navigation Satellite System). Traficom points out that the potential impact of wind turbines on maritime and coastal radio systems must also be considered. The reliable operation of radar and radio systems is an essential part of maintaining maritime and general safety. The impact on the operation of radars, radio navigation equipment and other radio equipment important for navigation and traffic control should be considered and ensured. The operation of radio links operating in the maritime area requires a completely unobstructed area between the transmitter and the receiver. Electronic communications services in coastal and maritime areas depend on radio systems and it is important to ensure that mobile services, radar and radio links are sufficiently undisturbed in maritime areas. Even minor changes in the siting of wind turbines can have a decisive impact on the operation of radio systems in the area.

The Ministry of Transport and Communications refers to its previous statement, dated 12 May 2023. The Ministry of Transport and Communications reforms its previous statement and also states that construction of offshore wind farm sites must consider the impact on maritime infrastructure. Smooth and safe maritime traffic in fairways and offshore maritime areas all year round is important. Consideration of maritime transport is important to safeguard the operational capacity of Finnish commercial navigation and to ensure safe and smooth maritime transport. Offshore wind farms can change traffic areas and routes, increase travel times and increase emissions from ships as fuel consumption increases. It is important to take into account the

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routes used by navigation outside the established fairways and routing systems. In addition, wind turbines will have an impact on the field strength and signal quality of mobile networks. Radio links operating in the maritime area require a completely unobstructed area between the transmitter and the receiver. Coastal and maritime electronic communications services are dependent on radio systems, and it is therefore important to ensure that mobile services, radar and radio links are sufficiently interference-free to operate in maritime areas. Even minor changes in the siting of wind turbines can have a decisive impact on the operation of radio systems in the area. The Ministry of Transport and Communications refers to Traficom's statement.

In its statement, **the Finnish Professional Fishermen's Association (SAKL)** refers to its previous statement, dated 12 May 2023. SAKL points out in its statement that the proposed changes do not change its previous position.

According to the statement of **the Finnish Transport Infrastructure Agency**, the project area considers the maritime traffic in the region and the maritime areas in the Swedish Maritime Spatial Plan, so its impact on maritime traffic to Finland is minor. During harshest winters, there has been icebreaking in the area, which is why it is important to consider the combined effect of the planned areas north of Gotland. The proposed changes concern total number and location of wind turbines within the project area, and these have no impact on maritime traffic to Finland.

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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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Appendices Received statements in Finland

For information
Ministry for the Foreign Affairs of Finland
Ministry of the Environment
Finnish Meteorological Institute (FMI)
Finnish Transport and Communications Agency (Traficom)
Ministry of Transport and Communications
Finnish Professional Fishermen's Association (SAKL)
Finnish Transport Infrastructure Agency