

Authority Services

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Subject: Finland's response to the notification regarding the national Swedish Marine Spatial Plans for the Gulf of Bothnia, the Baltic Sea and the Skagerrak/Kattegat

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

The Finnish Environment Institute acknowledges that Finland has received a notification from Sweden, dated 1 December 2022, 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 Swedish Environmental Protection Agency (SEPA) requested an indication whether Finland wishes to participate in the SEA, and comments regarding the revision of the current Swedish Marine Spatial Plans for the Gulf of Bothnia, the Baltic Sea and the Skagerrak/Kattegat, and other information on any transboundary planning issues and potential planning evidence that should be taken into consideration.

Finland has the possibility to participate in the assessments in accordance with Article 10 of the Protocol of Strategic Environmental Assessment (SEA Protocol) to the UN/ECE Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention). According to the amended Finnish Act on the Assessment of the Environmental Impact of Plans and Programmes of Authorities (200/2005, amendments 912/2022), the Finnish Environment Institute is the competent authority from 1 January 2023 in Finland.

Participation in the SEA

The Finnish Environment Institute states that Finland wishes to participate in the planning of the national Swedish Marine Spatial Plans of the Gulf of Bothnia, the Baltic Sea and the Skagerrak/Kattegat and the related SEAs. In order to response to information requests made by the SEPA, comments were asked from the following authorities in Finland: the Ministry of the Environment, the Ministry of Economic Affairs and Employment of Finland, the Ministry of Agriculture and Forestry of Finland, the Ministry of Transport and Communications, the Government of Åland (*Ålands landskapsregering*), the Finnish Transport and Communications



Agency (Traficom), and the Maritime Spatial Planning Coordination Group (Regional Council of Southwest Finland).

Concerning the time frame of transboundary consultation, which is planned to be held during autumn 2023, the Finnish Environment Institute confirms that a period of 12 weeks will be sufficient. To ensure that the authorities and the public in Finland are informed and given a possibility to submit their comments and opinions on the draft programmes and the environmental reports within a reasonable time frame in accordance with Article 10(4) of the SEA Protocol, Finland requests the materials in Finnish. In addition, Finland also wishes to receive the materials in Swedish.

Comments and information to be taken into consideration

Navigation

Several offshore wind farms are now planned in the Baltic Sea region. The Finnish Environment Institute recognises transboundary planning issues for consideration to the Swedish Agency for Marine and Water Management (SwAM). It is important for Finland and the self-governing region of Åland to take part in the process of updating the national Swedish Marine Spatial Plans and the environmental assessments, *inter alia*, from the point of view of the Finnish navigation. Navigation, and ensuring security and functioning of maritime traffic are essential for both Finland and Sweden.

In order to ensure the smooth operation of winter navigation, Finland and Sweden have a bilateral convention on cooperation in winter navigation. The operating conditions of navigation, especially in the Gulf of Bothnia, are a matter of common concern, and future national solutions will have consequences on international navigation.

Offshore wind farms may cause different impacts on navigation which need to be addressed in this regard. Offshore wind farms may have significant impacts on operational icebreaking. During an open water season, maritime traffic follows the most optimal routes to destination ports. For example, navigation to and from Finland passes the Swedish side of the sea in the Gulf of Bothnia. Therefore, the planning of offshore wind farms must consider navigation in different seasons, especially in the Gulf of Bothnia, which is relatively narrow and freezes in winter.

The fairways must also be considered in the planning of marine spatial plans. Offshore wind farms, which are located close to the fairways or the vessel traffic areas, can cause damage to both radar systems of vessels and radar surveillance for marine traffic control, or pose a risk to the navigation security and the use of the fairways.

The issues relating to the large-scale offshore wind farms and the offshore wind farms located close to each other must also be considered. As a result, this can cause changes in navigation areas and routes, longer travelling times, increased emission levels from vessels due to higher fuel consumption, and changes in port accessibility. The impacts can also affect the security matters for vessels navigating near or between the offshore wind farms. In addition, the impacts can increase both a need for icebreaking assistance, as vessels cannot be left on drifting ice near offshore wind farms, and additional icebreaking capacity, as a need for assistance will increase significantly compared to current levels.



The impacts can also increase vulnerability of navigation on disturbances in winter conditions which can show as a decrease in the choice of vessel routes when offshore wind farms are built in the area. It is important to give sufficient attention to the conditions for secure and smooth navigation, as offshore wind power increases. The impacts of the Swedish offshore wind farm areas on the Finnish navigation and its operating conditions and *vice versa*, are considered essential to be considered. In order to secure the operating conditions of navigation, it is considered necessary for the Finnish authorities to cooperate with the Swedish authorities.

The cumulative impacts

The transboundary cumulative impacts are relevant if numerous large-scale turbines are to be built in the Gulf of Bothnia. The planning should especially consider and assess the cumulative impacts across borders from the Åland Sea to the Bothnian Bay. The relevant information on species and habitats to the sea area should be considered.

The transboundary environmental impacts may at least affect birds, bats, marine mammals (e.g., seals, especially a ringed seal), and fish (e.g., breeding areas, fishing grounds and migration routes, and impacts on migratory fish species such as the salmon and the Baltic whitefish, *vandringssik*).

The construction of large-scale offshore wind farms may affect bird migration routes through the Baltic Sea, and especially feeding areas for auks, which may be located tens of kilometres away from the breeding colony. The transboundary impacts for birds extend to Norway and Russia, as birds that use the Gulf of Bothnia as a migration route also nest in the northern parts of Fennoscandia and the Svalbard. If possible, Sweden and Finland should jointly prepare a cumulative impact assessment. The cumulative impacts and any other impacts of offshore wind farms on these animals must be examined and planning should avoid impacts on them. The valuable nature must be protected from the impacts.

Both states have a pressure to build offshore wind farms in their sea areas, which can have long-range international impacts. The cumulative impacts on water flows must also be considered. The cumulative impacts of large-scale offshore wind farms on both sides of the Swedish and the Finnish Exclusive Economic Zones (EEZ) can be significant and centralise traffic flows in the Gulf of Bothnia considerably more than at present. The concentration of traffic flows between or close to offshore wind farms can have significant impacts on, *inter alia*, maritime security.

The seabed and water quality

The impacts on the seabed are important to be considered. The chapter 2.3.3. about *land, soil, water, air, climate, landscape, and built and cultural environments* of the consultation document is considered vague about the habitats on which the assessment is based. It should focus on HELCOM HUB habitat types, which are also defined on a biological basis and used for habitat vulnerability assessments.

It is not considered sufficient to assess only physical disturbance to the seabed, but also to assess the adverse impacts on the seabed ecosystem, including habitat types and functionality.

The impacts on water quality and concentrations of harmful substances on the seabed are considered important and should be taken into consideration in the SEAs and examined in the planning offshore wind farms.



Transmission links

Finland is not currently aware of any planned hybrid projects for the sea areas between Finland and Sweden. However, electricity transmission link issues are an integral part of this matter. It remains to be seen whether the planned offshore wind farm projects in Åland will be connected to the Finnish or Swedish grid or whether the generated electricity will be converted into hydrogen close to the production site. If possible, the grid connection issues for Åland could be included in the national Swedish Marine Spatial Plans. The cable routes related to offshore wind farms between Sweden, Åland and Finland are also considered important to include in the assessments. Overall, Sweden and Finland should coordinate their offshore wind farm projects and the transmission links in their maritime spatial plans.

The Finnish Maritime Spatial Plan 2030

The Finnish Environment Institute also recognises potential planning evidence for the SwAM to consider and use in the Marine Spatial Plans and the related SEAs.

It is relevant to recognise the existing network of fairways, ports, and shipping routes in the sea areas of Finland. The traffic areas ("seafaring areas") used for navigation provide a good overview on the traffic routes. The information is found on [Maritime Spatial Plan 2030 | \(merialuesuunnitelma.fi\)](https://merialuesuunnitelma.fi).

The Finnish Maritime Spatial Plan 2030 provides guidance on future use of the Finland's maritime space. The background studies and information are available on [Maritime Spatial Plan for Finland 2030 | \(merialuesuunnitelma.fi\)](https://merialuesuunnitelma.fi). Finland can provide more information other than contained in the Finnish Maritime Spatial Plan 2030.

It is particularly important to consider the divergent winter navigation routes to review the broad view, as these are not presented in the traffic areas identified in the Finnish Maritime Spatial Plan 2030. The traffic areas used in winter should be discussed in the first instance between the Finnish and the Swedish winter navigation authorities. Finland can provide and exchange information in this matter. In this regard, the Finnish Transport Infrastructure Agency (Väylävirasto) is the authority in Finland.

The Finnish Maritime Spatial Plan 2030 presents a general description of the maritime traffic areas which has been sufficient in previous years when there has not been as much demand to harness offshore wind energy and coordinate different activities as there are today. In addition, the size of planned offshore wind projects and the number of developers has increased compared to the past. As a result, a more precise definition of the sea areas used for the navigation is essential to secure the operational capacity of maritime transport and to coordinate the various activities.

The Åland Maritime Plan 2021

Åland has compiled its own maritime plan. In the preparation of the Åland Maritime Plan, which is found on [Marin- och kustområdesplanering \(Havsplanering\) | Ålands landskapsregering \(regeringen.ax\)](https://marin-och-kustomradesplanering.havsplanering.ax), the information on existing and future activities, interests and uses were compiled. The information used for the Åland Maritime Plan 2021 can be obtained from the Government of Åland.

The information regarding on the coastal and marine areas of Åland can be found on [map portal | \(kartor.ax\)](https://kartor.ax) of the Government of Åland.



After the adoption of the Åland Maritime Plan in 2021, the mapping of valuable underwater nature through inventories and modelling is ongoing. More information is found on [Åland SeaMap | The Baltic Sea Conservation Foundation \(baltcf.org\)](#) and [Biodiversesea LIFE-IP – för havsnaturen | Forststyrelsen \(metsa.fi\)](#).

Inventories and surveys have been initiated in connection with the environmental impact assessments of planned large-scale wind power projects in north and south of Åland. These include surveys of e.g., sediment, bottom fauna, vegetation and inventories of birds and porpoises, effects on shipping and fishing. The information is found in the recent revised consultation documents that were sent to the SEPA. The Government of Åland can provide more information in this regard.

Conclusion

To conclude, the Finnish Environment Institute expresses that Finland wishes to participate in the planning of the Swedish Marine Spatial Plans of the Gulf of Bothnia, the Baltic Sea and the Skagerrak/Kattegat and the related SEAs. It is vital that the remarks stated in this letter are taken into consideration in this regard.

It is important that the methods used to assess the impacts of different sea-based activities are the same, or at least comparable, in Sweden, Åland and Finland. To achieve this, there must be sufficient contacts between the three regions, through informal and formal forums for discussion and information exchange. It is desirable to have a forum that addresses the use of marine areas (e.g., wind power development) in an overall holistic way, so that synergies can arise between development and areas that contribute to ecosystem services.

Finland highlights its interest to follow the planning and to exchange information during it. A growing interest to harness offshore wind energy, especially in the Finnish and Swedish EEZs, has increased a need for improved coordination and dialogue between different functions.

Sincerely,

Head of Authority Services

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This document has been electronically signed.



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Ministry of the Environment
Ministry of Economic Affairs and Employment of Finland
Ministry of Agriculture and Forestry of Finland
Ministry of Transport and Communications
Government of Åland (Ålands landskapsregering)
Finnish Transport and Communications Agency (Traficom)
Maritime Spatial Planning Coordination Group (Regional Council of Southwest Finland)



Asiakirjan sähköinen allekirjoitus / Elektronisk underteckning / Electronic Signature

Asiakirja: SYKE/2023/105-4 Response to the notification regarding the national Swedish Marine Spatial Plans for the Gulf of Bothnia, the Baltic Sea and the Skagerrak/Kattegat.pdf

Seuraavat henkilöt ovat allekirjoittaneet tämän asiakirjan sähköisesti. / Följande personer har undertecknat detta dokument elektroniskt. / This document has been electronically signed by the following persons:

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* Allekirjoittajat ovat yllä organisaationimen mukaisessa aakkosjärjestyksessä. / The signers above are in alphabetical order according to their organization's name. / De ovan nämnda undertecknaren är i bokstavsordning efter organisationens namn.