Ympäristöministeriö
Miljöministeriet
Ministry of the Environment

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Finland's comments on the Danish Maritime Spatial Plan and the related Strategic Environmental Assessment

The Ministry of the Environment received notification from the Ministry of the Environment of Denmark concerning the Strategic Environmental Assessment (SEA) of the Danish Maritime Spatial Plan (MPS) on 16 March 2020. The Ministry of the Environment replied on 24 April 2020 that Finland wishes to participate in the planning procedure for the Danish Maritime Spatial Plan and the related Strategic Environmental Assessment, in accordance with Article 10 of the Protocol on Strategic Environmental Assessment to the UN/ECE Convention on Environmental Impact Assessment in a Transboundary Context.

On 24 March 2021, the Finnish Ministry of the Environment received information of consultation regarding the Danish Maritime Spatial Plan and the strategic environmental assessment on the likely transboundary impacts on the environment. The Ministry of the Environment has, in accordance with the Protocol on Strategic Environmental Assessment, informed the public and the authorities and given them an opportunity to provide statements and opinions on the documents sent by Denmark. The documents have been made available on the lausuntopalvelu.fi website. The material has also been available on the Ministry of the Environment's website. The Ministry of the Environment has also requested comments and opinions from 50 authorities and other bodies.

During the consultation period from 1 June to 31 August 2021, statements were received from the Centres for Economic Development, Transport and the Environment for Lapland as well as for Southwest Finland, Geological Survey of Finland, Metsähallitus, Federation of Finnish Fisheries Associations, Finland's Maritime Spatial planning coordination Group and Åbo Akademi. The statements received are enclosed in their entirety, and a summary of the statements is presented below in English, so that they can be taken into due account in accordance with Article 11 of the Protocol Strategic Environmental Assessment.

The Ministry of Education and Culture, Ministry of Transport and Communications, Headquarters of the Finnish Border Guard, Finnish Transport Infrastructure Agency, Finnish Meteorological Institute, Regional Council Southwest Finland and Suomen Vesiensuojeluyhdistysten Liitto informed that they do not have anything to comment.

The Ministry of the Environment thanks for the opportunity to provide comments on the Danish Maritime Spatial Plan and the related Strategic Environmental Assessment. The Ministry of the Environment considers that the Danish Marine Spatial Plan is very well prepared and will

promote the economic development of the maritime area and the protection of natural and other values. The Danish maritime spatial plan has been drafted in digital form only. It is presented clearly, and the pages are easy to use. The Ministry of the Environment values co-operation between the countries in maritime spatial planning and hopes that the good co-operation will continue in order to coordinate maritime spatial planning in the Baltic Sea also in the future. The Ministry of the Environment appreciates that the plan acknowledges the Marine Strategies and the Marine Strategy Framework Directive and clearly show that the impact of the Maritime Spatial Plans are important for achieving a good environmental status in the Baltic Sea.

On the basis of the comments received and reflecting its own views the Ministry of the Environment would like to pay special attention to the possible adverse transboundary impacts of offshore wind power development, especially on the populations of wintering and resting marine birds and migratory birds along the Danish coast. More detailed impact assessment, including cumulative impacts, and planning of mitigation measures is needed in the further planning of the projects. In addition, wind power development as well as construction of the sea floor may have impact on the occurrence of harbour porpoise in Finland's marine areas (including EEZ). The harbor porpoise in Finland are part of the critically endangered Baltic proper harbour porpoise population (ca. 500 animals) and whose occurrence overlaps to some extent with the Belt Sea population. Consequently, the activities on Danish maritime spatial plan may also affect the Baltic proper harbour porpoise population, either directly or indirectly through the Danish porpoise population. International objectives for preserving the harbour porpoise populations in the Baltic Sea should be taken into account in the detailed planning, impact assessment and monitoring of impacts of the projects.

Summary of the statements received

Centre for Economic Development, Transport and the Environment for Lapland notes that the maritime spatial plan, and the measures proposed, support the goal of good environmental status of the Baltic Sea, and if they are realized, they probably also improve living conditions of the fish stocks. However, the Centre for Economic Development, Transport and the Environment for Lapland does not see that the plan include such measures that would have impact on the fish stock or fishery in the Bay of Bothnia.

The Danish Maritime Spatial Plan designates areas also for future transport infrastructure projects, such as Helsingør-Helsingborg link and Fehmarnbelt link. Both projects, implemented as bridges or tunnels, may have major local impacts on the coastal landscape in Helsingborg, Sweden and Puttgarden, Germany. The Centre for Economic Development, Transport and the Environment for Lapland states that the maritime spatial plan is necessary in order to reconcile the needs of different activities.

Centre for Economic Development, Transport and the Environment for Southwest Finland notes that according to the environmental report the probable transboundary impacts of the maritime spatial plan will focus on the neighbouring sea areas of Denmark, some of them will affect the area of the Gulf of Bothnia and thus rather far away from Finland's marine areas.

Finland's marine area is not considered to be directly affected. The preparation of the Danish Maritime Spatial Plan as a whole is necessary for the coordination of different activities in both the territory of Denmark and its neighbouring countries. The plan can be used, for example, in the detailed planning of offshore wind farm clusters.

Extensive communication and consultation on the plan and the environmental report are necessary, as the plans prepared for marine areas may have far-reaching transboundary impacts. The proposed Maritime Spatial Plan and its environmental report are still quite general and informative, which means that very detailed comments cannot yet be given. The Danish Maritime Spatial Plan and the measures presented in it have been stated to support in principle the achievement of good environmental status of the Baltic Sea. The Centre for Economic Development, Transport and the Environment for Southwest Finland emphasises that the Danish Maritime Spatial Plan should aim to strengthen the improvement of the ecological state of the Baltic Sea and the achievement of the good environmental status in the Baltic Sea. The Centre for Economic Development, Transport and the Environment for Southwest Finland considers that the measures proposed in the plan are unlikely to have any significant impact on Finland's marine area.

Geological Survey of Finland considers that the activity in the Danish maritime area does not have such transboundary impacts to the Finnish abiotic sea marine environment (the seabed and sedimentation in the Finnish maritime area), which should be taken into account in the Danish maritime spatial plan and its environmental report.

Metsähallitus (state owned enterprise that manages and protects state-owned land and water areas) focuses, in its statement, on the species that move across national borders, i.e. birds and marine mammals. Offshore wind power development may have adverse transboundary impacts on the populations of wintering and resting marine birds and migratory birds along the Danish coast. The environmental assessment of the Danish Maritime Spatial Plan has identified that increasing offshore wind power in the southern parts of the North Sea and south of Bornholm in the Baltic Sea may cause internationally significant habitats to be dislocated or disappear. Increasing offshore wind power may also interfere the migration of migratory birds. The majority of Finnish birds migrate through the Danish territory. A large number of diving ducks and whooper swans also winter or rest on the Danish coast in the areas covered by the plan. The most significant sites on the Danish coast are included as Natura SPA sites and IBA areas, and in these areas as well as in the vicinity of these areas, significant measures affecting birdlife must be avoided. As is stated in the plan as a precautionary measure for wind power, important migratory routes must be mapped and wind power construction in their vicinity must be avoided. Wind power must be built far away from the main migratory routes, such as shores. Seabirds must be provided with pathways of sufficient width free of wind power installations to enable barrier-free movement. Further planning and environmental impact assessments should make use of species-specific data collected by HELCOM's working group (JWG Bird) on the most important migration routes in the Baltic Sea.

Areas reserved especially for the construction of the sea floor as well as wind power in the maritime spatial plan may have impact on the occurrence of harbour porpoise on the coast of Finland. Harbour porpoise is critically endangered in the Baltic Sea, and the estimated size of the population is about 450 animals. No breeding observations have been made on the coast of Finland since the 1930s, and in the most recent assessment of threatened species in Finland, the species was classified as an occasional visitor. The main breeding and feeding areas of the species are located in Denmark, Germany and Southern Sweden, and the measures that have impact on these populations also affect the number of individuals found on the coast of Finland. Retaining porpoise as bycatch in fishing has been considered the most significant threat. In addition, the population is threatened by underwater noise (incl. shipping, explosions carried out in connection with oil drilling, wind turbines in the construction phase). The environmental assessment of the Danish Maritime Spatial Plan has identified (4.4.) that the use of areas designated for development measures may increase activities in certain marine areas, which may affect the harbour porpoise population in the Baltic Sea. It has been noted that a more detailed assessment of possible transboundary impacts is required. They are planned to be carried out in connection with future planning and permit processes by means of strategic environmental assessments and environmental impact assessments or assessments of individual development projects. Future assessment processes and monitoring should take into account the international objectives for preserving the harbour porpoise populations in the Baltic Sea (HELCOM Recommendation 17/2). In addition to the impacts of increasing noise, the cumulative effects of human activity on the areas should also be taken into account, especially in the vicinity of known important breeding and feeding areas. The monitoring should be comprehensive so that the cumulative impacts on the harbour porpoise populations resulting from the regional reservations can be monitored with sufficient accuracy.

Finland's Maritime Spatial planning coordination Group (responsible for maritime spatial planning in Finland) notes, that areas designated for offshore wind power in the southern parts of the North Sea and South of Bornholm, may have significant negative impacts on wintering and resting seabirds and migratory birds. The coordination group points out that several water birds that nest in Finland winter in Danish marine areas. For example wintering conditions and securing migratory routes have significant impact on vitality of endangered species in Finland, such as common eider and greater scaup. More detailed impact assessment and mitigation measures targeted should be discussed at the latest when preparing individual projects. In accordance with the precautionary principle, the coordination groups supports the principle that internationally important bird areas (IBA areas), are avoided in the development of offshore wind power.

The coordination group notes that extensive areas designated in the Maritime Spatial Plan for renewable energy, such as wind power, support the controlled development to responding to climate change challenges – which is a positive and inevitable development prospect.

Federation of Finnish Fisheries Associations notes that commercial fishing in Finland takes place in the Baltic Sea and, due to weak status of the Baltic cod stock, only in the northern Baltic Sea. Therefore, Denmark's maritime spatial planning does not currently have a direct

impact on commercial fishing in Finland. In theory, there might be indirect impacts due to measures planned in the feeding area of salmon as well as measures that have an impact on grey seal population in the Baltic Sea and the cormorants travelling to Finland to nest.

The measures to be carried out in the feeding area for salmon are mainly the construction of the Nord Stream 2, which, to the understanding or the Federation of Finnish Fisheries Associations, will not affect the feeding area for salmon after installation. The Federation of Finnish Fisheries Associations notes that the grey seal is greatest adverse factor to the coastal fishing. The increase in the number of grey seals in the southern part of the Baltic Sea is also expected to contribute to the weak status of the cod stocks. Cormorant colonies have been found to have clear local adverse effects on the populations of target species for commercial coastal fishing. The Federation of Finnish Fisheries Associations hopes that a common approach is reached between the Nordic countries in the population management of grey seal and cormorant populations**,** which means that the measures in the Danish marine area also play a role. The Federation of Finnish Fisheries Associations suggests that the needs to restrict the growth of the grey seal and the cormorant populations are taken into account in the Danish maritime spatial planning.

Åbo Akademi highlights the importance of permit procedures and need for environment impact assessment before new activities are initiated. As the strategic assessment of the maritime spatial plan has been carried out at an abstract level, the environmental impacts and the cumulative effects are unclear. In addition, it has not been evaluated how climate change will potentially affect the plan (risk of floods, storms, changing wind conditions, etc.). Åbo Akademi raises several questions among others related to consideration of nature values and the characteristics and diversity of the underwater environment in the maritime spatial plan as well as ambiguities in the knowledge base. The full statement in Swedish is enclosed.

Permanent Secretary Juhani Damski

Senior Specialist Minna Torkkeli

Enclosure Statements received

For information Ministry for Foreign Affairs of Finland