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Swedish Environmental Protection Agency
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Finland's response to the supplementary notification under Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) concerning the planned Rajala Wind Farm in Sweden

The Finnish Environment Institute acknowledges that Finland has received the notification from Sweden on 9 October 2026, in accordance with Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) of the wind farm Rajala.

Information on the planned project

The planned Rajala wind farm is located in Pajala Municipality, Norrbotten County, Sweden. Sweden notified Finland of the project on 18 June 2025 in accordance with the Espoo Convention, and Finland confirmed its participation in the environmental impact assessment (EIA) procedure on 2 September 2025. Following the consultations held in summer 2025, the project plans have been revised to reduce environmental impacts and better accommodate local interests. The project area has been reduced, and the maximum number of wind turbines has decreased from 57 to 28, with a maximum height of 270 metres. The boundaries of the project area have also been adjusted to include some previously excluded areas.

Consultation in Finland

In accordance with Section 30, Subsection 1 of the Finnish Act on Environmental Impact Assessment (252/2017), the Finnish Environment Institute is the competent authority and responsible for tasks under the Espoo Convention.

Finland indicated on 2 September 2025 that it would participate in the EIA procedure of the planned project. In the supplementary notification, the Swedish Environmental Protection Agency requested comments on the revised project plans and the scope of the assessment of potential

transboundary environmental impacts, including comments from the public and the authorities in Finland.

The public and the authorities in Finland were given an opportunity to comment on the consultation documents from 13 October to 12 November 2026. The documents were made available on the website of Finland's environmental administration and on the Ministry of Justice's online consultation platform (lausuntopalvelu.fi). Statements were also requested from relevant stakeholders.

Remarks received during the consultation

The Finnish Environment Institute has prepared an English summary of the 8 statements received in Finland. The original statements in Finnish or Swedish, enclosed with this letter, contain important and detailed remarks that should be taken into account in their entirety in the EIA procedure.

The Sámi Parliament
The Sámi Parliament emphasises the importance of conducting a thorough assessment of the project's potential transboundary impacts on water bodies. Particular attention should be paid to catchment areas, watercourses, and connections between water bodies in order to determine whether construction activities, roads, underground cables, or other land use associated with the project could affect the Tornio River system and, consequently, the Sámi homeland in Finland. Based on the information currently available, it is not yet possible to determine whether such impacts would occur.

The Sámi Parliament further stresses that the project's potential impacts on the conservation objectives of the Tornio and Kalix River System Natura 2000 site should be assessed before any final planning or permitting decisions are made. The assessment should address direct, indirect, and cumulative impacts. In addition, the Sámi Parliament draws attention to the project's potential impacts on Sámi communities and reindeer husbandry in Sweden and emphasises the importance of incorporating the knowledge of local Sámi communities and reindeer herders into the assessment.

The Reindeer Herders' Association
The Reindeer Herders' Association emphasises the importance of thoroughly assessing the project's potential impacts on reindeer husbandry, including transboundary impacts on Finnish reindeer herding cooperatives. Although the revised project area has been reduced considerably, the Association notes that the potential impacts on reindeer husbandry in Finland have not been assessed or addressed in the available documentation.

The Association points out that reindeer may avoid wind farm areas and their surroundings, potentially leading to the displacement of reindeer across the Swedish-Finnish border. Given the project's proximity to the border and the absence of a continuous border fence, such movements could result in additional work and costs for Finnish reindeer herding cooperatives, as well as conflicts with local landowners and residents.

The Association calls for a comprehensive assessment of the project's impacts on reindeer pastures, grazing patterns and reindeer husbandry activities, including social, cultural and economic impacts and cumulative effects with other projects and land use. The assessment should draw on scientific research and the practical knowledge of local reindeer herding cooperatives and herders, and include dialogue with the affected cooperatives. The Association also stresses the need to identify measures to prevent and mitigate adverse impacts and to ensure full compensation to affected reindeer herding cooperatives for any impacts that cannot be prevented or mitigated.

Private person
The respondent considers the reduction in the number and height of turbines and the size of the project area to be positive developments. However, these changes do not necessarily eliminate the potential for significant transboundary environmental impacts. The respondent therefore supports

Finland's continued participation in the EIA procedure and calls for a clear comparison between the original and revised project plans, including changes to turbine locations and associated infrastructure.

The respondent emphasises the need for a comprehensive assessment of potential impacts on the Finnish side, particularly concerning landscape and cultural heritage, aviation obstacle lighting, noise, shadow flicker, water bodies, Natura 2000 sites, birdlife and reindeer husbandry. Particular attention should be paid to hydrological connections, ecological impacts, and the potential cumulative effects of other projects in Finland and Sweden. The assessment should be based on clearly documented methods, appropriate modelling assumptions and up-to-date information, including input from relevant Finnish stakeholders.

The respondent also identifies inconsistencies in the consultation documents concerning turbine heights and requests clarification of the technical parameters used in impact assessments and visualisations. Furthermore, the respondent stresses the importance of accessible consultation materials, transparent consideration of comments received from Finland, and sufficient environmental information before permitting decisions are made. Appropriate monitoring and measures to address unforeseen adverse impacts should also be established.

The Finnish Safety and Chemicals Agency (Tukes), Finnish Meteorological Institute, Natural Resources Institute Finland (Luke) and **Regional Council of Lapland** submitted no new comments but requested that their previous comments be taken into account. **The Municipality of Ylitornio** stated that it would not provide comments on the matter due to the distance from the project area.

Participation in the transboundary EIA procedure

As indicated in its response of 2 September 2025, Finland will continue to participate in the transboundary EIA procedure of the Rajala wind farm project under the Espoo Convention.

Conclusions

The Finnish Environment Institute notes that the reduction in the size of the project area and the number and height of wind turbines may reduce the project's environmental impacts. However, the statements received during the supplementary consultation highlight the need for further assessment of potential transboundary impacts.

Particular attention should be paid to potential impacts on water bodies and hydrological connections, the conservation objectives of Natura 2000 sites, reindeer husbandry, landscape and cultural heritage, and birdlife. The assessment should also consider cumulative impacts with other projects and land use, as well as potential impacts on reindeer movements across the Swedish-Finnish border. The Finnish Environment Institute emphasises the importance of using relevant scientific information and local knowledge, including that of Sámi communities and reindeer herders, in the assessment.

In addition, both the Swedish and Finnish versions of the supplementary consultation documents contain an inconsistency regarding the maximum permitted height of the wind turbines above sea level (518 metres / 2,700 feet). This inconsistency should be clarified and corrected, and consistency in the elevation data used in project planning and environmental impact assessment should be ensured.

The Finnish Environment Institute considers it important that the potential transboundary impacts are adequately addressed in the EIA report, including appropriate measures to prevent and mitigate adverse impacts. The results of the assessment and the consideration of comments received from Finland should be clearly documented.

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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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Finnish Meteorological Institute
Finnish Safety and Chemicals Agency (Tukes)
Finnish Supervisory Agency
Finnish-Swedish Transboundary River Commission
Municipality of Ylitornio
Natural Resources Institute Finland (Luke)
Regional Council of Lapland
Reindeer Herders' Association
Sámi Parliament in Finland

Asiakirja: **SYKE/2025/1187-27 Finland's response to the supplementary notification under Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) concerning the planned Rajala Wind Farm in Sweden (SYKE/2025/1187)**

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