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Answer to the notification in accordance with Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) for the offshore wind farms near the Northwest Coast of Estonia

Finland has received notification from Estonia concerning the environmental impact assessment (EIA) arising from the proposed construction of offshore wind farms near the Northwest Coast of Estonia. The notification was made in accordance with Article 3 of the Espoo Convention and with the Agreement between Finland and Estonia on Environmental Impact Assessment in a Transboundary Context. Included with the notification was an environmental impact assessment programme, along with a description of the project. Additionally, an application for special use of water was included with the material. The original deadline for answering the notification was 20 April, but the date was changed to 11 May by mutual agreement of the competent authorities — Ministries of the Environment in Finland and Estonia. The extended deadline allowed for the provided material to be translated into Finnish and Swedish and for public participation to be arranged after the translations were completed.

Finland has distributed the notification and its attached material to several authorities and environmental NGOs. The public also has had the opportunity to comment on the material. The period for public participation and for collecting comments was arranged from 18 April to 8 May. The material was made available for reading in the cities of Helsinki, Lappeenranta, Turku and Mariehamn, and was also posted on the Internet.

Comments were received from five authorities and no comments were received from the public.

The **Ministry of Agriculture and Forestry** was pleased that the environmental impact assessment includes sea mammals, fish and fisheries, including bottom trolling. The Ministry, however, does not see a direct connection between fish stocks and the seal population and the Finnish waters, which are under its responsibility.

The **Ministry of Trade and Industry** does not have any comments on the EIA procedure. If a new underwater electric cable were to be laid from Estonia to Finland, the Ministry will consider the project in connection with a permit according to the Electricity Market Act.

The **Finnish Environment Institute (SYKE)** considers that the most significant environmental impact of the project is its location in the main flyway for birds migrating to Finland. Birds using this migration route stop to rest especially in the Natura 2000 sites in Finland. The assessment programme states that impacts on birds and water animals are minimal because they learn to avoid large installations. This is not necessarily the case when many wind power plants are situated in groups. Research on this matter has been published in the Finnish Environment Series (Jarmo

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Koistinen, 721/2007). Finland should participate in the procedure because of the potential negative impacts on birdlife. Impacts on water quality are considered to be mainly short term and local.

The **National Board of Antiquities** states that the project does not have an impact on the cultural heritage of Finland.

The **Institute of Marine Research** points out that environmental impacts of offshore wind farms are not adequately known because of the lack of experience of projects of this size. The impacts of the construction phase are mainly local and short term and may not reach to Finland in any significant way. In addition, the permanent impacts on the sea bottom, changes in the bottom benthos species and changes in the sea currents in the vicinity of the wind power plants should remain mainly local. Impacts on sea mammals, birds, and possible disturbances to migration patterns of arctic birds may be considered permanent. Mammals and birds often range over extensive areas and populations are not always confined to one country but are common to many countries. These potential environmental impacts are seen significant and, thus, Finland should participate in the EIA of the project.

WWF Finland states that Finland should participate in the EIA because of the importance of the area to birdlife.

Based on the comments received, and reflecting its own views, the Ministry of the Environment would like to state that Finland will participate in the EIA of the wind farms near the Northwest Coast of Estonia. As the area where the wind farms are planned to be located is one of the most important resting places for migratory birds and also a possible wintering habitat for Steller's eider, Finland's international target species, the environmental impact assessment should also take these concerns into account (e.g. a description of the migration route and its significance, the placing of wind power plants relative to the migration route, risks to birdlife, impact on target species and on mutual conservation status, and mitigation measures). Finland has much knowledge and expertise in these matters, and the Finnish Environment Institute (SYKE) can be contacted for assistance as the national expert body. In addition, possible transboundary impacts on sea mammals should be assessed. Furthermore, potential impacts on water quality in areas under Finnish jurisdiction should be included in the assessment, given the possibility that harmful substances may be found in sediments.

These comments are based on the information stated in the notification that the developer has withdrawn plans for an additional cable link to Finland.

On behalf of the Permanent Secretary,
Director General

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