



Vides pārraudzības valsts birojs

*Environment State Bureau of the Republic of Latvia*

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**Regarding the transboundary environmental impact assessment of the planned wind power plants (wind turbines) in Biržai District Municipality (administrative centres of Nemunėlis Radviliškis and Parovėja)**

The Environment State Bureau (hereinafter – the Bureau), acting as a Point of Contact regarding Notification in accordance with the Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (hereinafter – the Espoo Convention) of Latvia and the competent authority on the environmental impact assessment (hereinafter – the EIA) in Latvia, express gratitude to the Ministry of Environment of the Republic of Lithuania for information concerning the economic activity proposed by a Lithuanian developer „Biržų vėjas” that comprises construction and operation of up to 35 wind power plants (wind turbines) in Biržai District Municipality (administrative centres of Nemunėlis Radviliškis and Parovėja) (hereinafter – the Project) with reference to Article 3 of the Espoo Convention.

The Bureau hereby acknowledges receipt of the notification and the prepared documentation. Considering the nature and scope of the Project and the possibility of the transboundary impacts, we hereby confirm that Latvia intends to take part in the proceedings on the EIA and transboundary consultations as an affected party.

Please be informed that the Bureau published received information regarding Project on the Bureau`s webpage<sup>1</sup> on 30<sup>th</sup> of June 2023 and send information directly to the involved authorities. The public concerned was given the opportunity to express comments from 30 of June till 31 of July. The Bureau has received opinions and comments regarding the Project and its potential transboundary impacts within the scope of competence from the Ministry of the Environment Protection and Regional Development of the Republic of Latvia, the Ministry of Foreign Affairs of the Republic of Latvia, the Ministry of Health of the Republic of Latvia, the

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<sup>1</sup><https://www.vpvb.gov.lv/lv/parrobezu-ietekmes-uz-vidi-novertejumu-projekti/veja-parka-lidz-35-veja-elektrostaciju-buvnieciba-un-ekspluatacija-birzu-rajona-pasvaldibas-panevezys-apaksrajona-nemunelis-radviliskis-un-paroveja-ciemu-apkartne-lietuva>.

Ministry of Interior of the Republic of Latvia, the Ministry of the Climate and Energy of the Republic of Latvia, the Nature Conservation Agency, the State Environmental Service, the Zemgale Planning Region and the Bauska County Municipality. The Bureau has not received written comments from the public.

Below mentioned authorities highlighted aspects that need to be stressed and foreseen in the transboundary EIA of the Project:

- The Ministry of the Environment Protection and Regional Development of the Republic of Latvia noted that:
  - Taking into account that in the vicinity of the planned wind power plants (at the nearest point ~ 0,9 km away) is a territory of the karst region – specially protected nature territory, geological and geomorphological natural monument “*Skaistkalnes karsta kritenes*”, *Natura 2000* site (LV0402200)<sup>2</sup> and one of the aspects of the impact of the installation (possibly also operation) of the planned facilities (wind power plants) is the vibrations that will arise as a result of the use of heavy machinery, in the view of the Ministry, in the nearby area, including the territory of karst region in Latvia, it is necessary to evaluate effects on geological processes, as well as on *Natura 2000* site.
  - Considering the area of the planned wind farm, it is essential to evaluate the impact on bird migration routes.
  - Examining information about the Project, the Ministry concludes that the nearest wind generator is located approximately 0,9 km from the border of Latvia and approximately 1,2 km from the nearest residential houses, which could cause public concern about potential impacts, incl. impact on the landscape.
  - Considering the proximity of the planned wind farm to the border of Latvia, residential houses, and natural values, it is essential to provide the opportunity for Latvian society to get involved in solving environmental issues.
- The Nature Conservation Agency provides the following information:
  - In the Latvian nature data management system “*Ozols*” (<https://ozols.gov.lv/pub>), there is also available information about natural values in the territories near the Project area. This information should be considered during the scientific research of the Project. Data requests to the Nature Conservation Agency can be made according to the instructions published on the website: <https://www.daba.gov.lv/en/services/use-geospatial-data-sets-natural-data-management-system>.
  - The Project impact on the ornitho-fauna must be assessed and obligatory include:
    - **Breeding area of the lesser spotted eagle** (*Clanga pomarine*) – historically the lesser spotted eagle was nesting in the natural monument “*Skaistkalnes karsta kritenes*” (coordinates X 249942 Y 542951), in 2022 this nest was no longer found; however, bird pair was observed in the immediate vicinity of this area. It is recommended to include in the Project a precautionary threshold of 5 km from nesting sites of the lesser spotted eagle, if nesting is observed. Wind power stations No 6 and 11 are located very close to the *Natura 2000* site “*Skaistkalnes karsta kritenes*” and since this is a potential nesting place for the lesser spotted eagle, the impact on species population also must be assessed in this area.
    - **Migratory bird species research** in Project impact assessment and migration

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<sup>2</sup>[https://natura2000.eea.europa.eu/?data\\_id=dataSource\\_7-Layman\\_sites\\_2246%3A20186&page=Page-1&sitecode=LV0402200&views=Feature\\_Info\\_Sites\\_View\\_Species](https://natura2000.eea.europa.eu/?data_id=dataSource_7-Layman_sites_2246%3A20186&page=Page-1&sitecode=LV0402200&views=Feature_Info_Sites_View_Species).

corridor determination. If the territory is used by migrating birds in spring/autumn (as a feeding place or it is included in the migration corridor), it is recommended to stop the operation of the turbines during the greatest migration flow.

- **Alternative evaluation**- to reduce the collisions of both predatory and migratory birds, use radars that stop the movement of the rotor blades when approaching both a large bird and a flock of birds.
  - **Monitoring** before building the wind farm and in the exploitation of it. Monitoring results must be noted in the wind farm exploitation in future.
- It would be essential to evaluate the environmental impact of the utilization, recycling or disposal of worn-out parts and equipment after the end of the operational period of wind park equipment (towers, rotors, etc.) also in a cross-border context.
- The State Environmental Service asks for special attention to be paid to the potential impacts of the Project on the development of a hot process in Latvia and to carry out an assessment of potential impacts directly during the construction process on karst area, as well as, if necessary, to provide mitigation measures to mitigate negative impacts, to preserve the environmental quality of residential houses nearby the border (noise disturbance, vibration, electromagnetic radiation), noise, flashing effect and other aspects)<sup>3</sup>, landscape changes (including solutions to minimize impacts) and bird and bat migration pathways (resulting in the development of best/least-performing technical solutions (alternatives) to minimize negative impacts). In view of the interest of the local community, the State Environmental Service asks to find effective solutions for informing the local public and for the public consultation of the Project.
  - The Bauska County Municipality, on the basis of the Vecumnieki Municipality Council Binding Regulations No. 4 of 29 May 2013 “*On Approval of the Graphical Part of the Vecumnieki Municipality Spatial Plan, Territorial Use and Building Regulations*”<sup>4</sup>, for the construction of wind power plant with height exceeding 20 m and capacity exceeding 20kW, sets the following requirements for the administrative territory of the Bauska County Municipality:
    - to observe the minimum distance from the outer safety boarder of the wind power plants zone to a residential area 300 m.
    - in accordance with the requirements of the Law on Environmental Impact Assessment and related regulatory acts prevent the border of the wind power plant's safety protection zone from entering a specially protected natural area and not causing adverse effects on the specially protected natural area.
    - in accordance with the requirements of the Cabinet Regulation No 16 “*Procedures for Noise Assessment and Management*” (07.01.2014.), to locate wind power plants in such a way that the environmental noise limit in the built-up territories of Latvia is not exceeded<sup>5</sup>.
    - to take into account that the protected geological and geomorphological natural monument “*Skaistkalnes karsta kitenes*” is located in the vicinity of the planned wind

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<sup>3</sup> In addition, the Ministry of Health of the Republic of Latvia suggested to include assessment of the impacts of the potentially generated infrasound as well.

<sup>4</sup> [https://geolatvija.lv/geo/tapis#document\\_104](https://geolatvija.lv/geo/tapis#document_104).

<sup>5</sup> According to the Annex 2 of the Cabinet Regulation No 16 “*Procedures for Noise Assessment and Management*” (07.01.2014.) the noise limit for residential area of individual houses ((mansions, small floors or single houses), child institutions, medical treatment, health and social care institutions) is L<sub>day</sub> (7:00 – 19:00) 55 dB(A), L<sub>evening</sub> 19:00 – 23:00 50 dB(A) and L<sub>night</sub> 23:00 – 7:00 45 dB(A).

power plant, to assess and provide an expert opinion on the possible impact on the karst processes.

In addition, to promote effectiveness of participation of to the Latvian public and relevant authorities in the transboundary consultation process, we shortly give you an overview of the national requirements for the EIA procedures in the Republic of Latvia. We would like to draw your attention that Latvian legislation, in particular the Law on Environmental impact assessment, designates at least 30 days long term for the process of public consultation when elaborated EIA report is discussed. The time is being counted from the day a publication is published in a corresponding newspaper (national, regional, local) which will be ensured by the Republic of Latvia after receiving information. A public hearing meeting of the intended activity shall be held. According to the national legislation, a public hearing meeting shall be held no sooner than 7 days after publication is published and no later than 10 days before the end of the public consultation process. In this context we inform you that the public hearing meeting can be replaced with a video conference and video presentations. Afterwards the Bureau will compile the proposals submitted by the public and stakeholders and send them to the Ministry of Environment of the Republic of Lithuania.

We kindly ask you to prepare the EIA summary that reflects information to the extent and scope necessary for the transboundary EIA (including graphical materials and maps in relation to the transboundary impact aspects) in Latvian.

Looking forward to a further constructive and effective bilateral cooperation in the transboundary context,

Yours sincerely,

Indra Kramzaka (signature\*) Deputy Director of the Environment State Bureau of the Republic of Latvia

*\*Document is sign with secure electronical signature*

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