



Vides pārraudzības valsts birojs

*Environment State Bureau of the Republic of Latvia*

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Rūpniecības iela 23, Rīga, LV-1045, Latvia, phone +371 67321173, e-mail [pasts@vpvb.gov.lv](mailto:pasts@vpvb.gov.lv), [www.vpvb.gov.lv](http://www.vpvb.gov.lv)

Rīga

23.01.2024 No. 5-05/88/2024

Ref. to: 05.12.2023. Case number 02330-23 “*Herkules*”

**Swedish Environmental Protection Agency**  
[registrator@naturvardsverket.se](mailto:registrator@naturvardsverket.se)

**Regarding the supplementary notification of transboundary environmental impact assessment of the planned offshore windfarm project “*Herkules*” in Sweden’s exclusive economic zone**

The Environment State Bureau (hereinafter – the Bureau) would like to express gratitude to the Swedish Environmental Protection Agency for sent supplementary notification regarding the transboundary environmental impact assessment (hereinafter – the EIA) of the planned offshore windfarm project “*Herkules*” in Sweden’s exclusive economic zone (hereinafter – the Project).

The Bureau hereby acknowledges receipt of the supplementary notification and prepared documentation. Please be informed that the Bureau published received information regarding the Project on Bureau’s webpage<sup>1</sup> on 11th of December 2023 and send information directly to the involved authorities. The Bureau received response from the Ministry of the Environment Protection and Regional Development of the Republic of Latvia, the Ministry of the Climate and Energy of the Republic of Latvia, the Ministry of Foreign Affairs of the Republic of Latvia, the Ministry of Defense of the Republic of Latvia, the Ministry of Health of the Republic of Latvia, the Ministry of Interior of the Republic of Latvia, the Ministry of Transport of the Republic of Latvia, the Nature Conservation Agency, the State Environmental Service, and the Kurzeme Planning Region. The Bureau has not received comments from the public.

The Bureau has gathered and evaluated opinions received from above mentioned authorities. The Ministry of Transport of the Republic of Latvia provided more detailed opinion. It stated that in accordance with the Amendment to scoping document concerning the Hercules Wind Farm, December 5th, 2023 (amendment to Consultation document for scoping documentation concerning the construction and operation of Hercules Floating Wind Farm in the Baltic Sea (thereafter – the

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<sup>1</sup><https://www.vpvb.gov.lv/lv/parrobezu-ietekmes-uz-vidi-novertejumu-projekti/atkrastes-veja-elektrostaciju-parks-herkules-buvnieciba-baltijas-jura-zviedrijas-ekskluzivaja-ekonomiskaja-zona>.

Wind Farm) Sweden's Economic Zone) the Simply Blue Energy (Hercules) AB (thereafter – the Applicant) would like to supplement scoping document with an increased number of wind turbines and presents new layouts of the Wind Farm. Based on the adjustment the number of wind turbines are increased from 121 to a maximum of 160. The Applicant proposes two general scenarios of possible layouts (layout A and layout B) of the Wind Park. The Ministry of Transport of the Republic of Latvia identified that in the layout A wind farm overlaps with the existing shipping routes to the Baltic ports Ventspils, Liepaja and Klaipeda (see Figure 2 below).

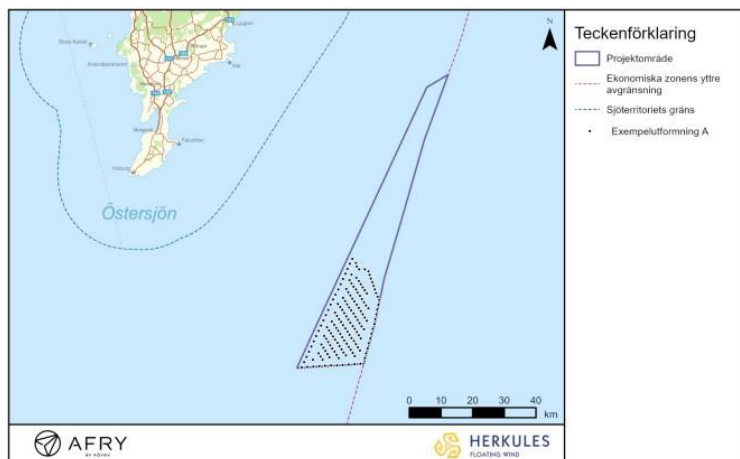
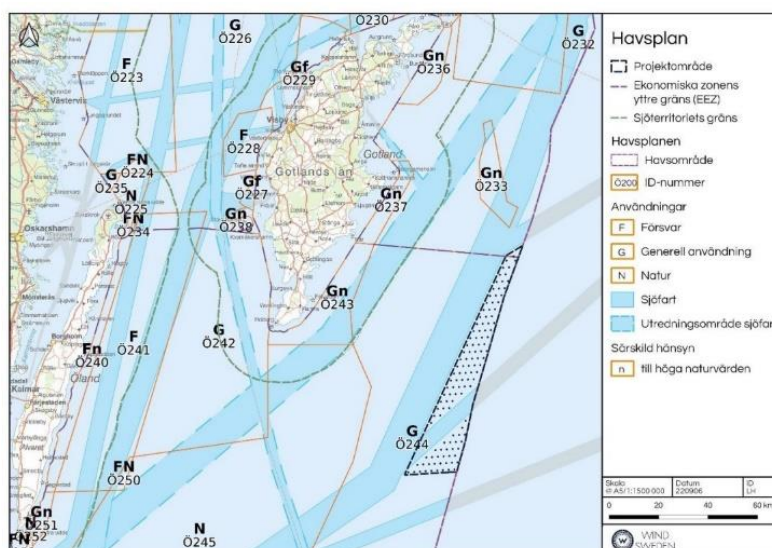


Figure 2 Example layout A for Hercules wind farm. Teckenförklaring – Legend, Projektområde – project area, Ekonomiska zonen yttre avgränsning – Exclusive Economic Zone boarder, Sjöterritoriets gräns – Territorial waters boarder, Exempelutformning A – Exempel layout A.

*Figure 2 from Amendment to scoping document concerning the Hercules Wind Farm (page 4). Example layout A for Hercules wind farm.*

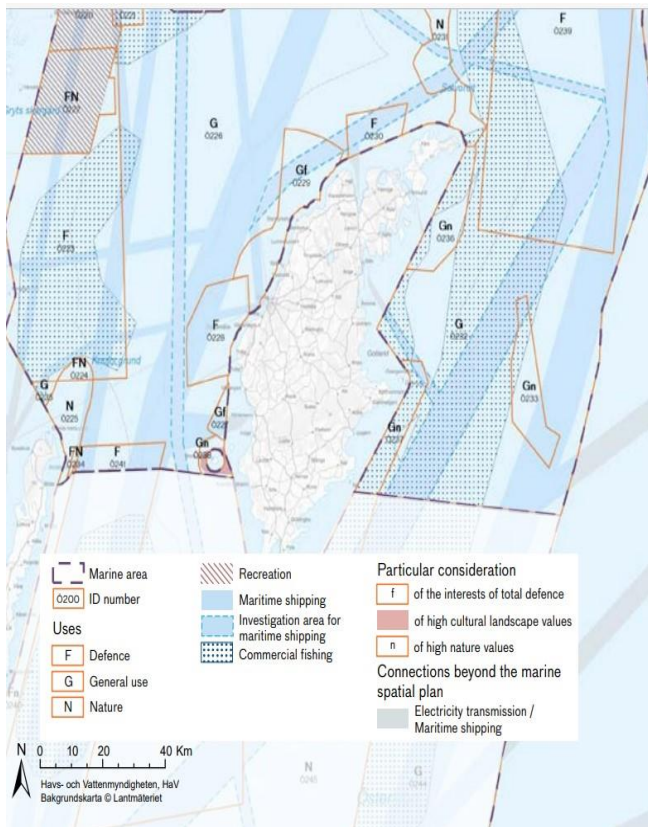
Within the EIA and transboundary consultations in March 2023 the Ministry of Transport of the Republic of Latvia already has indicated, that in the Figure 12 of the *Consultation document for scoping documentation concerning the construction and operation of a wind farm in the Baltic Sea, Sweden's Economic Zone* shipping routes from Latvia doesn't match HELCOM shipping routes map - shipping routes VEN-04 and LIE-01 were not marked. The Ministry of Transport of the Republic of Latvia kindly requested to correct the Figure 12 according to the HELCOM map (<https://helcomresurvey.sjofartsverket.se>). These shipping routes are not indicated in the *Amendment to scoping document concerning the Hercules Wind Farm*. The Ministry of Transport of the Republic of Latvia would like to request that this correction is made.



*Figure 12 from Consultation document for scoping documentation concerning the construction and operation of a wind farm in the Baltic Sea, Sweden's Economic Zone (page 26).*

*The national marine plan showing which areas that affect the Hercules project area.*

In addition the Ministry of Transport of the Republic of Latvia would like to draw attention to the fact that in accordance with the Marine Spatial Plans for Baltic Sea in National planning in Sweden's territorial waters and exclusive economic zone (2022) the routes Ö244–Ö245 in marine areas are for maritime shipping use (*Marine Spatial Plans for the Gulf of Bothnia, the Baltic Sea and the Skagerrak/ Kattegat*, 2022, page 103).



*Map 7 from Marine Spatial Plans for Baltic Sea in National planning in Sweden's territorial waters and exclusive economic zone 2022.*

*Marine spatial planning map for the central part of the Baltic Sea.*

The maritime traffic is important in the Southeast Baltic Sea, with extensive movement to both foreign and Swedish ports. West of Gotland the traffic is mainly to Swedish destinations, while international traffic to and from the Gulf of Finland and the Baltic states dominate south and east of Gotland (*Swedish Agency for Marine and Water Management*, 2017). Three shipping routes which extend from ports in the Baltic states (Ventspils, Liepaja and Klaipeda) and connect to the deep waterway southeast of Gotland in Sweden's exclusive economic zone **are substantially significant public interests**. These shipping routes are busy gateways to Baltic states with busy traffic used by short sea shipping containerships and ferries, including *Stena Line* ferries. Based upon the above mentioned, the Ministry of Transport of the Republic of Latvia opposes the Wind Farm project scenarios the implementation of which would affect the existing shipping routes to/from Baltic ports.

Therefore, the Ministry of Transport of the Republic of Latvia kindly requests that the Consultation document, when amended, is in line with the Sweden's Marine Spatial Plan for the Baltic Sea (2022) and the respective maps in the Consultation document are supplemented and corrected accordingly.

The Bureau informs that other authorities noted that there are no additional comments regarding the present changes of the Project as well as there are no additional comments regarding the scope

for the assessment of the environmental impacts. However, we kindly ask you to consider information that was given in the Bureau`s letter (April 28, 2023, No. 5-05/569/2023) about aspects that need to be stressed and foreseen in the environmental impact assessment of the Project (see Attachment).

Attachment: The Environment State Bureau`s letter No. 5-05/569/2023 dated April 28, 2023.

Yours sincerely,

Daiga Avdejanova (signature\*) The Director of the Environment State Bureau of the Republic of Latvia

*\*Document is sign with secure electronical signature*

Ilze Lielvalode, phone: +371 67770813,  
e-mail: ilze.lielvalode@vpvb.gov.lv