

Environment State Bureau of the Republic of Latvia

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Riga

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Ref. to: 10.01.2024. Case number NV-00320-24 "Ran"

Swedish Environmental Protection Agency registrator@naturvardsverket.se

Regarding the transboundary environmental impact assessment of the planned offshore wind farm "Ran" in Sweden's territorial waters outside of Gotland

The Environment State Bureau (hereinafter – the Bureau), acting as a Point of Contact regarding Notification in accordance with 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, would like to express gratitude to the Swedish Environmental Protection Agency for information sent concerning the planned offshore wind farm "Run" in Sweden's territorial waters outside of Gotland (hereinafter – the Project) with reference to Article 3 of the Espoo Convention.

The Bureau hereby acknowledges the receipt of the notification and prepared documentation.

Please be informed that the Bureau published received information regarding Project on Bureau`s webpage¹ on 16th of January 2024 and send information directly to the involved authorities. The Bureau 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 the Climate and Energy of the Republic of Latvia, the Ministry of Foreign Affairs of the Republic of Latvia, the Ministry of Defence of the Republic of Latvia, the Ministry of Transport of the Republic of Latvia, the Ministry of Health of the Republic of Latvia, the Ministry of the Agriculture of the Republic of Latvia, the Ministry of Interior of the Republic of Latvia, the Nature Conservation Agency, the State Environmental Service, the Kurzeme planning region, the Ventspils Municipality. The Bureau has not received comments from the public.

The authorities provided following comments:

<u>The Ministry of Health of the Republic of Latvia</u> shared opinion that due to the distance of the planned offshore wind farm "Ran" to the coastal territory of Latvia, the Project will not have an

<sup>&</sup>lt;sup>1</sup>https://www.vpvb.gov.lv/lv/parrobezu-ietekmes-uz-vidi-novertejumu-projekti/atkrastes-veja-parka-ran-buvnieciba-baltijas-jura-zviedrijas-teritorialajos-udenos.

impact on the human health.

In the view of the Ministry of Defence of the Republic of Latvia the construction of the planned offshore wind farm "Ran" will not have a direct negative impact on the defence interests of the Republic of Latvia.

The State Environmental Service noted that the document "Documentation for notification pursuant to Article 3 of the Espoo Convention" provides assessment on the potential impacts (including transboundary) on the surrounding flora and fauna (including fish, bats, birds, etc.), landscape, cultural heritage, recreational resources, fisheries, etc. from which the State Environmental Service concludes that no significant environmental impacts are expected in the territory of Latvia and the exclusive economic zone.

## <u>The Nature Conservation Agency</u> provided the following opinion:

- 1. *Prima facie*, the Project might not cause a significant negative impact on the seabirds in Latvian territorial sea, however, the possible long-term effects of the different reactions of birds towards wind farm at the population level are difficult to estimate. Therefore, in order to be able to maintain a reliable and justified opinion, accurate and systematic assessments are necessary. As indicated in document "*Documentation for notification pursuant to Article 3 of the Espoo Convention*", special attention during impact assessment should be paid to the aspects of bird behaviour and territorial distribution in the EIA of the Project:
  - It must be ascertained which bird species and in what quantity use the territory of the Project as a feeding place both in winter and in summer.
  - An assessment of migrating birds is required to determine how they choose their paths in relation to the planned wind farm territory, including direction and height.
  - The potential barrier effect, possible avoidance strategies and collisions with birds should be assessed.
  - It is also important to analyze the cumulative effects that may occur, taking into account several factors and the long-term operation of the wind farm.
- 2. To assess and minimise the impact of wind farm construction on fish and marine mammals in the EIA of the Project, as the Nature Conservation Agency considers that there is a potential transboundary impact here.
- 3. It is very important for the EIA of the Project to perform a cumulative assessment of the (existing, approved, planned) construction of wind farms in the Baltic Sea.
- 4. The proposed new NATURA 2000 territories in Latvian waters should be taken into account in the EIA of the Project (detailed information is provides on website: <a href="https://reef.daba.gov.lv/public/eng/about">https://reef.daba.gov.lv/public/eng/about</a> the project/.)

The Kurzeme Planning Region pointed out that planned offshore wind farm "Ran" may influence existing shipping safety, areas, and navigation mode in the Baltic Sea, on accessibility to / from Latvian harbours, and that, in case of accidents or ship collisions, there are potential risks of marine pollution, possibly affecting the Baltic Sea and its natural habitats.

Other authorities had no comments concerning the protentional transboundary impacts as well as scope for the assessment of the environmental impacts of the Project.

The Bureau has gathered and evaluated opinions expressed by all above mentioned authorities regarding necessity of entering into transboundary consultations. The Bureau in agrees with estimation that Latvia is not likely to be affected to such an extent that would require participation in the EIA of the Project as an affected country under the Espoo Convention.

Though Latvia does not intend to take part in the transboundary consultation process as an affected party, we kindly ask the Swedish Environmental Protection Agency to inform us about the findings of transboundary impact, especially if negative impacts on the environment are possible in the territory of Latvia, and the results of the EIA of the Project. In addition, we kindly ask you to consider above mentioned information about aspects that need to be stressed and foreseen in the EIA of the Project.

Yours sincerely,

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

\*Document is sign with secure electronical signature

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