



Vides pārraudzības valsts birojs

Environment State Bureau of the Republic of Latvia

Rūpniecības iela 23, Rīga, LV-1045, Latvia, phone +371 67321173, e-mail pasts@vpvb.gov.lv, www.vpvb.gov.lv

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Swedish Environmental Protection Agency

registrator@naturvardsverket.se

Regarding the transboundary environmental impact assessment of the planned offshore Pleione Energy Farm in the Baltic Sea, in Sweden’s exclusive economic zone

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 Pleione Energy Farm in the Baltic Sea, in Sweden’s exclusive economic zone (hereinafter – the Project) with reference to Article 3 of the Espoo Convention.

The Bureau hereby acknowledges receipt of the notification and prepared documentation. Considering the nature and scope of the Project and the possibility of 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 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 District Municipality, the Ventspils Municipality.

Below mentioned authorities provided comments regarding scope for the assessment of the transboundary environmental impacts of the Project.

In the view of the Ministry of Defence of the Republic of Latvia the construction of the planned

¹<https://www.vpvb.gov.lv/lv/parrobezu-ietekmes-uz-vidi-novertejumu-projekti/pleiones-energijas-parka-buvnieciba-baltijas-jura-zviedrijas-ekskluzivaja-ekonomiskaja-zona>

Pleione Energy Farm will not have a direct negative impact on the defence interests of the Republic of Latvia.

The Ministry of Health of the Republic of Latvia 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 impact on the human health.

The Ministry of the Transport of the Republic of Latvia draws attention that according to document “*Documentation for notification pursuant to Article 3 of the Espoo Convention*” planned energy farm borders with two shipping lanes and there is a risk of impact on shipping in the form of increased collision risk and accidents linked to the production of hydrogen gas. The Ministry of the Transport of the Republic of Latvia indicated that a nautical risk analysis will be carried out and the risk to shipping will be considered in the forthcoming EIA. The Ministry of the Transport of the Republic of Latvia kindly asks to consider the areas intended for navigation in Sweden's national Maritime spatial plan for Swedish territorial waters and exclusive economic zone in the EIA of the Project and indicate accordingly.

The State Environmental Service sees the there is need to pay particular attention to the impact of the production by-product - a large volume of cooling water (approximately 15° C higher temperature than the seawater taken for desalination) on the environment, to the study of bird and bat migration routes, as well as finding the best/safest technical solutions (alternatives) for minimizing negative impacts and possible accident risks. The State Environmental Service also asks to evaluate the current practice in preventing pollution risks (with oil products, etc.) in the construction and operation of similar energy parks sea waters, determining appropriate guidelines for the implementation of projects, it would also be necessary to assess the risks and consequences of planned infrastructure accidents, incl. in case of malicious damage.

The Nature Conservation Agency noted that, *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, 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, including,

- 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, considering several factors and the long-term operation of the wind farm.

In addition, the Nature Conservation Agency highlights necessity to assess and minimise the impact of wind farm construction on fish and marine mammals in the EIA of the Project, as there is a potential transboundary impact here. 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. The proposed new NATURA 2000 territories in Latvian waters should be taken into account in the EIA of the Project (detailed information is found on website: https://reef.daba.gov.lv/public/eng/about_the_project/.)

The Kurzeme Planning Region points out that planned Pleione Energy farm may have an effect on 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 already heavily polluted Baltic Sea and its natural habitats.

In the view of the Ventspils District Municipality, the most significant transboundary impacts that should theoretically be evaluated in the process of transboundary EIA are – impact on the landscape, impact on fish resources, impact on the operation of the fishing industry.

The Ventspils Municipality draws attention to the fact that the most important information to be included in the EIA is an assessment of the impact of the construction and operation of planned installations on the Baltic Sea ecosystem. Furthermore, that document does not contain any information that the effects of possible technogenic accidents of the toxic and hazardous substances produced will be assessed under the EIA procedure.

In addition to the above highlighted aspects that should be stressed and foreseen in the transboundary EIA of the Project, the Bureau shares opinion that taking into account the high amount of oxygen produced that can be injected into the sea, as well as the expected changes in temperature and salt concentration, the assessment of the Project should include information on the possible impact of these processes on changes in the feeding capacity of fish and birds depending on the chosen centralised or decentralised hydrogen production option and possible changes in bird wintering and migratory habits. Assessment of the technological risks associated with potential explosions and fires on hydrogen production platforms and the consequences thereof should be included in the Environmental Report as well.

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 for the Project 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 Swedish Environmental Protection Agency.

We kindly ask you to prepare the Summary of the EIA report in Latvian.

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

Yours sincerely,

Daiga Avdejanova (signature*) Director of 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

Dace Strode, phone: +371 67770819
e-mail: dace.strode@vpvb.gov.l