



Vides pārraudzības valsts birojs

Environment State Bureau of the Republic of Latvia

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The General Directorate for Environmental Protection

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Regarding the transboundary environmental impact assessment of the project “Offshore Wind Farm Baltica-1+”, in the Polish Exclusive Economic Zone of the Baltic Sea

The Environment State Bureau (hereinafter – the Bureau), acting as a Point of Contact of Latvia regarding Notification in accordance with Convention on Environmental Impact Assessment in a Transboundary Context (hereinafter – the Espoo Convention) and the competent authority on the environmental impact assessment (hereinafter – the EIA) in Latvia, would like to express gratitude to the General Directorate for Environmental Protection for information sent regarding the project “Offshore Wind Farm Baltica-1+”, in the Polish Exclusive Economic Zone of the Baltic Sea (hereinafter – the Project). The Bureau hereby acknowledges the receipt of the notification¹.

Please be informed that the Bureau published received information regarding Project on Bureau`s webpage² and send information directly to the involved authorities. The Bureau has received response 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 Defence of the Republic of Latvia, the Ministry of Health of the Republic of Latvia, the Ministry of the Climate and Energy of the Republic of Latvia, the Ministry of Transport of the Republic of Latvia, the State Environmental Service, the Kurzeme Planning Region, the Maritime Administration of Latvia. The Bureau has not received written comments from the public.

¹ The Bureau received notification on January 19, 2024; registration No 5-05/208.

²<https://www.vpvb.gov.lv/lv/parrobezu-ietekmes-uz-vidi-novertejumu-projekti/atkrastes-veja-parks-baltica1-baltijas-jura-polijas-ekskluzivaja-ekonomiskaja-zona>

The authorities provided following comments:

In the view of the Ministry of Defence of the Republic of Latvia the Project 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 to the coastal territory of Latvia, the Project will not have an impact on the human health.

The Ministry of Transport of the Republic of Latvia highlighted the following:

- The Environmental Scoping Report states that the Project area is located outside the main deep-water navigation routes of the Baltic Sea, but the shipping route to the port of Klaipeda passes through its southern part, which is mostly used by cargo and passenger ships (page 24 of the Environmental Scoping Report; Figure 2.4).
- The Project will be an obstacle to shipping and will cause permanent change in the shipping route to Klaipeda port (page 65 of the Environmental Scoping Report).
- The offshore wind farm “*Baltica – I*” will be laid directly adjacent to the western part of the border the offshore wind farm “*Baltica-1 +*”, in the 10 km distance away will be the natural gas production sites B4 and B6, and 17 km away will be the offshore wind park “*Södra Victoria*” (page 69-70 of the Environmental Scoping Report, Figure 10.1).
- At the same time the Environmental Scoping Report for the offshore wind farm “*Baltica – I*”³ indicates that the territory of the offshore wind park “*Baltica – I*” project is located outside the main deep-water navigation routes of the Baltic Sea, but the shipping route to the port of Klaipeda passes through its southern part, which is mostly used by cargo and passenger ships (page 22 of the Environmental Scoping Report for the offshore wind farm “*Baltica – I*”, see Figure 2.4.)

Having assessed information included in the Environmental Scoping Report of the Project, the Ministry of Transport of the Republic of Latvia concludes that:

- No cumulative impact has been assessed on the fairway to Klaipeda port from offshore wind farms “*Baltica – I*” and “*Baltic – I+*”, as well as other existing and planned facilities near the Project.
- The alternative shipping route to Klaipeda port is not indicated in the Project area.
- It is not described how much deviation ships will have to make compared to the existing shipping route.
- It is not mentioned whether such an alternative shipping route in Polish waters will be provided at all.

In addition, the Ministry of Transport of the Republic of Latvia noted that the shipping route to Klaipeda Port is used by liner vessels, including CMA CGM, MAERSK, UNIFEEDER, SEA CONSORTIUM container ships, which call port of Klaipeda on their voyage rotation and then go to Riga Port. Thus, beside direct impact on all ships going to Klaipeda Port, container ships going further to Latvian Ports are also affected.

Thus, the Ministry of Transport of the Republic of Latvia does not agree with statement expressed in the notification letter concerning the insignificant negative transboundary impact on the territory of Latvia in this aspect and kindly asks General Directorate for Environmental Protection to inform the responsible institutions and the Project developers concerning requirement to indicate the

³ According to the General Directorate of the Environment Protection letter No D DOOŠ-TSOOŠ.440.6.2023.MJ.2 dated on September 7, 2023, “*Environmental Scoping Report Baltica – I Offshore Wind Farm*”, document reference IM_5844_KIP_001_EN_04.

alternative shipping route in the Project and adjacent territory, which will be secured for shipping to the Klaipeda Port. Such shipping route should be connected to an existing shipping route as it is indicated in the Swedish Maritime Spatial plan. Considering mentioned, the Ministry of Transport of the Republic of Latvia kindly asks that the developers of the Project conduct the EIA, taking into account the necessity to include alternative shipping route to the Klaipeda Port.

The Kurzeme Planning Region opinion is that no direct impact on the Kurzeme Planning Region area and coastline is expected considering distance from the Project's area. However, the Kurzeme Planning Region points out that the Project may impact existing shipping safety, areas and navigation mode in the Baltic Sea, 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.

The Maritime Administration of Latvia, within the scope of its competence, does not see adverse transboundary impact of implementation of the Project on the territory of Latvia.

The State Environmental Service informs that the nearest special area of conservation in territory of Latvia located approximately 220 km from the Project's area and is the *NATURA 2000* site, the marine protected area "*Nida – Pērkone*" (code LV0900100). The protected nature area has been established for the protection of underwater reefs and habitats, as well as for the protection of bird species whose population sizes reach the criterion of an internationally important site. According to the submitted information, the Project does not affect this protected nature area, as well as other major bird migration routes in the exclusive economic zone of Latvia of the Baltic Sea. The Environmental Scoping Report includes assessment the potential impacts 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.

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 general 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. However, several involved authorities have pointed out aspects of possible transboundary impacts which we kindly ask to consider when carrying out EIA of the Project. Thus, we kindly ask the General Directorate of the Environment Protection to inform us about the results of the EIA of the Project.

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

Sincerely yours,

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

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