



Vides pārraudzības valsts birojs

Environment State Bureau of the Republic of Latvia

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Rīga

December 14, 2020 No 5-01/ 1171

Ref. to:

October 14, 2020 No 7-12/20/12-15

Espoo focal point:

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**Regarding Environmental impact assessment programme
of the offshore windfarm project in the Gulf of Riga
initiated by Eesti Energia AS**

Environment State Bureau (hereinafter – the Bureau), acting as a competent authority on environmental impact assessment (hereinafter – EIA) in Latvia, would like to thank the Ministry of Environment of the Republic of Estonia for sending information about the elaborated draft EIA programme (hereinafter – the Programme) for planned offshore windfarm project in the gulf of Riga that is initiated by Eesti Energia AS (hereinafter – the Project).

Having assessed The Programme and answers provided by the Project initiator, The Bureau considers that the Programme foresees a broad and detailed investigation, addressing main aspects of concern that were previously highlighted by the stakeholders of Latvia.

We have received comments and opinions from various stakeholders – the Ministry of Environmental Protection and Regional development, the Ministry of Agriculture, the Ministry of Transport, the Ministry of Defence, the Ministry of Foreign Affairs, the State Environmental Service, the Nature Conservation Agency, the Maritime Administration of Latvia and the Salacgriva county. The Bureau concludes that some of the stakeholders have repeated their previously provided comments. That does not mean that relevant impact aspects have been left out of the scope of EIA, but stresses the importance of assessment that is planned.

The Ministry of Environmental Protection and Regional Development asks:

1. To take into account the Latvian Maritime Plan for Inland Sea Waters, Territorial Sea and Exclusive Economic Zone (hereinafter referred to as the Latvian Maritime Plan) approved by the Cabinet of Ministers of Latvia on 17 May 2019 (the English translation of which is available on the website of the Ministry of Environmental Protection and Regional Development <https://www.varam.gov.lv/en/maritime-spatial-planning>).
2. To include in EIA graphic materials also the planned wind park research zone in the territory of Latvia (Wind Park research zone “E5”) that is planned in the sea opposite Ainaži and is

specified in the Latvian Maritime Plan (geospatial data in the form of WMS service is available on the website: <https://geolatvija.lv/geo/p/290>).

3. To include in EIA graphic materials the protected marine territory in Latvian sea waters “Ainaži - Salacgrīva” in all related pictures of EIA documentation, which show Natura 2000 territories, including in picture No 13 of the Programme “*Natura 2000 sites in the vicinity of the planned offshore wind farm*”. Geospatial data of this protected marine territory is available on the website of European Commission <https://www.eea.europa.eu/data-and-maps/data/natura-11> as well as can be downloaded in the Latvian Nature Data Management System “OZOLS” (<https://ozols.gov.lv/pub>).
4. To evaluate (in cooperation with the Latvian electricity transmission system operator JSC Augstsprieguma tīkls) the possibility to create a common cable corridor for the Project and a similar offshore wind farm in the Wind Park research zone “E5” in the territory of Latvia.
5. To evaluate the visual impact of the Project alternatives on popular tourist sites and culturally significant places not only on the Estonian coast, but also in the territory of Latvia, including visual impact assessment at least for Salacgrīva town centre and historical centre and coast of Ainaži city, which is relatively close to the Project area (~ 17-23 km) and are defined as priority complexes of development in the Latvian thematic planning document – State Long-Term Thematic Plan for the Development of Public Infrastructure on the Baltic Sea Coast, 2016.
6. To use the official titles of Latvian institutions in the EIA documentation, incl. replacing the name “Ministry of the Environment of Latvia” with “Ministry of Environmental Protection and Regional Development of the Republic of Latvia”.

The Ministry of Defence draws attention to the planned location of the wind farm that is at the common border. Although the Programme states that the planned wind farm will not disturb shipping traffic as a foreseeable environmental factor, it mentions a possible accident that could cause oil pollution. The Programme concludes that the risk of oil pollution exists in both the construction and operation phases, therefore this aspect is included in the Program and it is planned to take into account the possible spread of oil spills to the Republic of Latvia. As a countermeasure, it must be possible to eliminate an oil spill within 24 hours of its occurrence during the operation of the wind farm.

Considering the location of the wind farm, the Ministry of Defence is of an opinion that there is a high probability that spilled oil products (in case of an accident) will enter the territory of Latvia, as well as it is possible that Estonia could ask Latvia for help. The Ministry of Defence informs that Latvian Navy does not have additional resources at its disposal to ensure the elimination of the consequences of oil pollution at the facility in the territory of Estonia. Therefore, the Ministry of Defence repeatedly asks EIA to address the following issues:

1. possible disturbances to the Latvian maritime surveillance system and radar operation;
2. the risk of oil pollution and ability of Latvia to respond to oil spills;
3. the impact of the wind farm on the navigation regime and navigation safety in the Gulf of Riga, incl. intended security and protection areas;
4. changes in the navigation regime and navigation restrictions during the operation and in the event of an accident;
5. assessment of the danger area in the event of an accident, possible accident scenarios, their course and planned countermeasures in the event of search and rescue operations;
6. planned wind farm maintenance, supply and personnel relocation; the scope and organization of operations at sea;

7. maritime accident risk assessment, possible accident scenarios, their consequences and planned countermeasures;
8. wind farm accident elimination plan, specific countermeasures to reduce accident risks / consequences, provisions of technical resources and personnel, mechanisms for involvement of operational resources of the Republic of Latvia.

The Nature Conservation Agency has already previously indicated that in the framework of EIA special attention should be paid to the impact on migratory birds, bats, seals and salmonids. The agency considers that these aspects are included in the Programme (Table 4. Expected impacts, forecasting methods and comparison of alternatives), as well as it is planned to involve relevant Estonian experts. At the same time the Nature Conservation Agency is of an opinion that these aspects should be analysed and further studied not only in the territory of the Project and in the part of the Estonian sea area (as indicated in the Programme), but also in the part of the Latvian sea area, involving relevant Latvian experts. Therefore, the Nature Conservation Agency asks to supplement the Programme by expanding the research area and envisaging involvement of Latvian experts.

The State Environmental Service asks to supplement the scope of the Programme, including information about the protected marine territory "*Ainaži - Salacgrīva*" (Natura 2000 site) in the section "*List of protected nature objects*" (p.4.1.3.) and other parts of the Programme. The Bureau agrees with the State Environmental Service that there are rather hasty conclusions made in section "*Forecasting of obviously significant impacts*" (p.6.4) and section "*Results of the previous assessment of Natura*" (p.6.5.) that adverse effects on the protected marine territory "*Ainaži - Salacgrīva*" are not forecasted and that due to distance the impact on the integrity and protection objectives on this territory can be ruled out. It is necessary to assess all negative impacts (also indirect and cumulative impacts) and their possible effect on Natura 2000 territories (for example, on the protection of migratory birds). Therefore, the protected marine territory "*Ainaži - Salacgrīva*" should not be completely excluded from the scope of the assessment. The State Environmental Service also asks to consider that impacts during the construction, operation and demolition phases of the wind turbines (noise, vibration, water pollution with suspended solids (siltation) etc.) can spread and have effect in the territory of Latvia, so the assessment scope should not be limited only to the territory of Estonian sea area.

The Project initiator – Eesti Energia AS has asked to provide them with contacts of Latvian responsible authorities in the field of marine navigation safety, risk aspects, measures in the event of an accident etc. According to the national legislation the general state administration in maritime affairs is implemented by the Ministry of Transport, various functions are performed by the Latvian Maritime Administration, but certain functions in maritime affairs are performed in accordance with their competences by the Naval Forces of the National Armed Forces, which perform the functions of the Coast Guard, the State Environmental Service, the Transport Accident and Incident Investigation Bureau, the Security Police, the State Border Guard and the port Authorities. Therefore, it is reasonable to coordinate the communication through the respective ministries. At this stage the issues about safety measures, possible accident scenarios, rescue operations etc. have been mainly addressed in the comments received from the Ministry of Defence, which will also be involved in the assessment of EIA report. The contacts for communication provided by the Ministry of Defence are:

1. Armands Apeins, Lieutenant Commander, Senior Expert, Operational Planning Department, Joint Staff of the National Armed Forces (e.mail: Armands.Apeins@mil.lv, phone: 67071154);
2. Agnese Krauze, Senior expert, Environmental Quality Assurance Division, Environmental and Landfill Management Department, National Defense Military Facilities and

Procurement Center (e.mail: agnese.krauze@vamoic.gov.lv, phone: 26514664).

The Project initiator – Eesti Energia AS has also asked to give an overview about the next steps (and dates) for transboundary EIA. We shortly give you an overview of the national requirements for EIA procedures in the Republic of Latvia. 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 from the Republic of Estonia that EIA report is elaborated and ready for public display. A public hearing meeting of EIA report shall also 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 ending of public consultation process. Due to the outbreak of coronavirus (Covid-19), public hearings shall now be organized remotely – they are replaced with video-presentations and online video conferences.

For more specific information and guidance on these or any other practical issues we kindly ask you to communicate directly with The Bureau (contact information: Iveta Jegere, Environmental Impact Assessment Division, e.mail: iveta.jegere@vpvb.gov.lv, +371 67770818).

Sincerely yours,



Arnolds Lukšēvics

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