



Vides pārraudzības valsts birojs

Environment State Bureau of the Republic of Latvia

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Mr. Kaupo Heinma

The Ministry of the Environment of the Republic of Estonia

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Regarding the notification in accordance with Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context concerning the Utilitas OÜ Saare – Liivi 5 offshore wind farm project in the Gulf of Riga

The Environment State Bureau (hereinafter – the Bureau), acting as a competent authority on the environmental impact assessment (hereinafter – the EIA) in Latvia, would like to thank the Ministry of the Environment of the Republic of Estonia for information sent concerning the Utilitas OÜ Saare – Liivi 5 offshore wind farm project in the Gulf of Riga (hereinafter – the Project) with reference to Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention).

The Bureau 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 we intend to take part in the proceedings on EIA and transboundary consultations.

We have made publicly available information and documents sent by the Ministry of the Environment of the Republic of Estonia and have received comments regarding aspects that need to be stressed and foreseen in the transboundary EIA of the Project and specifically highlighted by various stakeholders:

- The Ministry of Environmental protection and Regional Development (hereafter – the Ministry) points out that the overall the Project is focused on climate neutrality, including achievement of climate and energy objectives. The Ministry noted that it is planned to redirect the cable of the offshore wind farm to the territory of Latvia. In this case the Ministry asks initiator of the intended activity to consult the Ministry (e-mail: pasts@varam.gov.lv), the Maritime Administration of Latvia (e-mail: lja@lja.lv) and Augstsprieguma tīkli AS (the transmission system operator in the Republic of Latvia; e-mail: ast@ast.lv) before planning this activity. Concerning the planned use of wind energy to produce hydrogen during the intended activity, the Ministry would like to receive additional information regarding the possible impact of the specific activity on the territory of Latvia. The Ministry also points out that the potential impacts of the intended activity should also be

assessed considering the planned offshore wind farm survey area E5 near the Ainaži (the Ainaži Municipality) by the Marine spatial plan of Latvia.

- The State Environmental Service indicates that the main issues that should be addressed (impact on landscape, potential damage to underwater habitats, migrant birds, shipping traffic, fisheries, potential mineral resource extraction and cumulative impacts with other planned wind parks in the Gulf of Riga) are already mentioned in the Decision as the main issues. The State Environmental Service highlights the importance of impact assessment on the migratory birds and bat species.
- In the point of view of the Nature Conservation Agency of the Republic of Latvia (hereinafter – the Agency) due to the distance, unlikely the direct impacts on specially protected areas, habitats, and species in the territory of the Republic of Latvia are not expected. However, it should be noted that according to the information available in EMODnet (<https://emodnet.ec.europa.eu/en>), there are planned four more smaller offshore wind farms (*AS Essti Energia 1005 MW*, *AS Eesti Energia Area 2 1005 MW*, *Ohaka Energia 450 MW* and *Liivi Laht 960 MW*) closer to the border of the Republic of Latvia. In addition, according to the Latvian Marine spatial plan planned offshore wind farm survey area E5 is located close to them. Therefore, the cumulative and indirect impacts of the planned offshore wind farm on specially protected areas, birds, fish, mammals, and bats should be assessed in the EIA. The Agency noted that noise and solid-state suspension will be created during the works, which may affect fish and their spawning grounds. It is necessary to assess the cumulative impact of planned offshore wind park on marine mammals, bat, and bird migration routes/corridors, feeding sites or wintering areas, as well as to assess whether specially protected species in marine NATURA 2000 areas are not affected (including possible impacts of changes in feed, recreational, wintering or habitat conditions).
- The Ministry of Health of the Republic of Latvia (hereinafter – the Ministry of Health) recommended to evaluate aspects of impact in the EIA of the planned offshore windfarm “*Saare – Liive 5*” like precise technical solutions relating to the engineering characteristics of the site, the preparation of the site and the establishing of access roads, the impact of preparatory works on adjacent areas, transportation of building materials and buildings and temporary storage solutions, impact of works on the hydrological regime and geological processes, solutions for water supply and wastewater drainage, and other factors that may have adverse effects on the environment. In addition, the Ministry of Health recommends using guidelines prepared by the Baltic Environment Forum “*Guidelines for investigation of offshore wind farms on the marine environment in the Baltic States*” (<http://bef.ee/wp-content/uploads/2014/04/EIA-Guidelines-2009.pdf>).
- The Ministry of Agriculture of the Republic of Latvia asks to pay particular attention to issues relating to the impact of offshore wind park construction on marine habitats and fish, including fish spawning grounds.
- The Ministry of Defense of the Republic of Latvia (hereinafter – the Ministry of Defense) asks to evaluate aspects like possible interference with the Latvian maritime surveillance system and radar operation, oil and chemical pollution risk and the ability of the Latvian Navy to respond to oil or chemical leaks, impacts on flight safety and maritime and air navigation systems. The experts of the Ministry of Defense expressed willingness to participate in the transboundary consultations. In case there is need for direct contact with the Ministry of Defense, please feel free to use this e-mail: pasts@mod.gov.lv.
- The Salacgrīva Port Authority points out importance to resolve such issues in the process of EIA as the current solutions regarding the planning of shipping routes, the construction of electricity cables and connections to shore infrastructure, the spawning of fish sites as well as other economic and environmental issues.

Concerning the scope of assessment – we kindly ask you to evaluate all aspects of environment according to the Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment.

In addition, we shortly give you an overview of the national requirements for 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 from the Republic of Estonia. A public hearing meeting of the intended activity 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 ending of public consultation process. In this context we inform, 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 Ministry of the Environment of the Republic of Estonia.

We kindly ask you to prepare EIA summary that reflects information to the extent and scope necessary for the transboundary EIA (including graphical materials and maps in relation to the transboundary impact aspects) in Latvian.

Looking forward to a 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 safe electronical signature*

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