



Vides pārraudzības valsts birojs

Rūpniecības iela 23, Rīga, LV-1045, tālr. 67321173, e-pasts pasts@vpvb.gov.lv, www.vpvb.gov.lv

Rīgā

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The Ministry of the Environment of the Republic of Lithuania
info@am.lt

Beata Silobriene
beata.silobriene@am.lt

Regarding the transboundary environmental impact assessment of the Installation and operation of the offshore wind turbine farm of about 700 MW capacity allowable to connect to onshore grid in the Lithuanian marine territory of the Baltic Sea

The Environment State Bureau (hereinafter – the Bureau) would like to express gratitude to the representatives of the Ministry of Environment of the Republic of Lithuania, the Ministry of Energy of the Republic of Lithuania and representatives of the draft report of the Environmental Impact Assessment (hereafter – the EIA report) for cooperation regarding organizing public participation of the transboundary environmental impact assessment of the project “*Installation and operation of the offshore wind turbine farm of about 700 MW capacity allowable to connect to onshore grid in the Lithuanian marine territory of the Baltic Sea*” (hereinafter – the Project) as well as regarding the high-quality study and evaluation of impacts that was carried out during environmental impact assessment (hereafter – the EIA) and provided during the hearing of the EIA Report.

According to the national legislation and bilateral cooperation regarding public participation process, the term for the process of public participation in Latvia was determined from 7th of April till 7 of May 2023. Information regarding the EIA of the Project and public participation options was published on the Bureau webpage¹, local newspaper “*Kurzemes Vārds*” (in the Edition on the 7th of April 2023) and send directly to the various stakeholders considering the national procedure of the EIA in the transboundary context. The record of the hearing held on 18th of April 2023 on Zoom platform was published on the above-mentioned the Bureau`s webpage.

¹<https://www.vpvb.gov.lv/lv/parrobezu-ietekmes-uz-vidi-novertejumu-projekti/veja-elektrostaciju-parka-buvnieciba-baltijas-jura-lietuvus-republikas-teritorija-lietuvus-republikas-energetikas-ministrija>.

Please be informed that we received opinions and comments regarding the EIA Report from the Ministry of the Transport of the Republic of Latvia, the Nature Conservation Agency of the Republic of Latvia, and the State Environmental Service of the Republic of Latvia; there have been no comments from the public received.

The State Environmental Service stated that according to the EIA Report the main and significant impacts of the Project are related to fish, precisely during the construction of the wind farm, which is not a long-term activity. The second and most significant impact is on the bird resources, in particular on the sea ducks, since it is apparent from the EIA Report that the construction of the wind farm will affect and possibly lose their forage sites, it is proposed as compensatory measures to move wind turbines away from the *NATURA 2000* site *IBPA Klaipeda – Ventspils plateau* border at a distance of 1 km (applying part of the wind turbines during wintering) or 2 km (without applying restrictions on the operation of wind turbines). The State Environmental Service agrees with the conclusions of the EIA Report that the most favorable alternatives are related to the creation of wind turbines not less than 1 km from the *NATURA 2000* site *IBPA Klaipeda – Ventspils plateau* border, where the wind turbine shutdown is partially applied during the wintering period or to place wind turbines not less than 2 km from the *NATURA 2000* site, without restrictions on wind turbines. The State Environmental Service welcomes the fact that, after construction and operation of the wind farm, more types of observations should be made – monitoring from the monitoring of the aquatic environment to the observation of effects on birds and bats.

The Nature Conservation Agency notes the following additions that should be included in the EIA Report:

- The project mentions that one of the implementation options envisages the construction of wind turbines along the border of an existing *NATURE 2000* site. With the help of monitoring, it is planned to clarify whether wind turbines interfere with birds and, if disturbed, wind turbines would not be operated in the future. The Nature Conservation Agency points out that water birds are disturbed by structures as such, because some birds are afraid of them. Stopping the rotor in this case would not reduce the impact of the built wind turbines and are expected to have the greatest impact on gorgeous ends. A study in the North Sea² shows that the presence of the wind farms in the sea has impact on the divers (*Gaviidae*). They also perceive lower objects in the sea, such as ships. Other species of birds, such as the long-tailed duck (*Clangula hyemalis*), are not fed in the vicinity of the structures.
- Regarding the potential coloring of wind turbines, seemingly prioritized aesthetic view – to make people see as badly as possible the turbines from the shore, so the coloring is intended to be grey. However, with caution, the Nature Conservation Agency recommends choosing a contrasting, asymmetrical (two white, one black) turbine blade coloring to reduce the risk of bird collisions during migration.
- According to the results of air research of the Latvia's wintering birds, there is indicated an important concentration of wintering ducks and *Mergus* on south from Liepaja city. In 2022, there were significant numbers of the long-tailed ducks (*Clangula hyemalis*), the velvet scoters (*Melanitta fusca*), the common scoters (*Melanitta nigra*), the divers (*Gaviidae*) (in significant quantities), the great cormorants (*Phalacrocorax carbo*), the goosanders (*Mergus merganser*), the black guillemots (*Cephus grylle*), the common eider (*Somateria mollissima*). The Nature Conservation Agency recommends, when planning the implementation of the wind park construction works, to consider the

² Heinänen S., Žydelis R., Kleinschmidt B., Dorsch M., Burger C., Morkūnas J., Quillfeldt P., Nehls G. 2020. Satellite telemetry and digital aerial surveys show strong displacement of red-throated divers (*Gavia stellata*) from offshore wind farms. *Marine Environmental Research* 160: <https://doi.org/10.1016/j.marenvres.2020.104989>

possibility to carry out construction works outside the wintering period of the water birds.

The Ministry of the Transport of the Republic of Latvia noted that it had no comments or proposals on the aspects of the assessment of the transboundary environmental impact of the Project.

Regarding further procedures we kindly ask you to send us information mentioned in the Article 6 of *the Convention on environmental impact assessment in a transboundary context* (hereinafter – the Convention) when the final decision of the Project to conclude the process of the transboundary consultations. In addition, according to the Article 7 of the Convention we ask to inform us about the results of post – project analysis of the Project.

The Bureau would like to express willingness to continue commenced successful bilateral cooperation in the field of the environment impact assessment in the transboundary context.

Yours sincerely,

Daiga Avdejanova (signature*)

Director of Environment State Bureau of the Republic of Latvia

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Ilze Lielvalode, phone: +371 67770813,
e-mail: ilze.lielvalode@vpvb.gov.lv