



Vides pārraudzības valsts birojs

Environment State Bureau of the Republic of Latvia

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The Ministry of the Climate of the Republic of Estonia

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Regarding the transboundary environmental impact assessment of the additional encumbered area of Saare – Liivi offshore wind park

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 and Protocol on Strategic Environmental Assessment and the competent authority on the environmental impact assessment (hereinafter – the EIA) in Latvia, would like to express gratitude to the Ministry of Climate of the Republic of Estonia for information sent concerning *The additional encumbered area of Saare – Liivi offshore wind park* (hereinafter – the Project) and the EIA, including the brief summary of the EIA programme in Latvian.

The Bureau has 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 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 Agriculture 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 Nature Conservation Agency, the State Environmental Service. The Bureau has not received written comments from the public.

Below mentioned authorities highlighted aspects that need to be stressed and foreseen in the EIA of the Project:

- The Ministry of Agriculture of the Republic of Latvia pointed out that particular attention should be paid to the impact of the construction of wind parks on marine habitats and fish, including fish spawning grounds and migration routes. As a proposal, *the Institute of Safety, Animal Health, and the Environment BIOR*¹ could be involved in carrying out relevant joint

¹ <https://bior.lv/en/about-institute-bior/about-us>

- research (if any) on the impact of the project on herring stocks and their migration routes.
- The Ministry of Defence of the Republic of Latvia commented that the Project will not have a direct negative impact on the defence interests of the Republic of Latvia.
 - The Ministry of Transport of the Republic of Latvia stated that:
 - Cannot agree with the information mentioned in the Section 4.3.2. of the EIA programme that there are no water traffic zones in the Project territory. The initial and additional areas of the project are used for recreational vessel's traffic.
 - The EIA of the project should assess the impact on Short-sea shipping and recreational vessel's traffic between the Irbe Strait, the ports of Latvia and the ports of Estonia, including the ports of Pärnu and Varbla. Shipping routes must be clearly indicated in the Project's site plan.
 - The EIA of the project should assess the cumulative impact of the initial and additional area of the Project on ship traffic. Between the initial and additional areas of the Project, a shipping lane for recreational boat traffic should be provided.
 - The EIA of the project should evaluate the analysis of the visibility of the wind turbines from coastal settlements and the maximum vertical viewing angle of their visual visibility above the horizon, as well as the effect of the sunlight reflection of the wind turbine blades during sunset.
 - The Nature Conservation Agency noted that the map of potentially important places and migration routes for birds shows that the spring migration route of water birds locates from south to north. The map does not illustrate in detail the origin of migratory birds and the route from the south direction. When the migration route is extended to the south, it will cross the planned wind farm areas. Therefore, it is very important to evaluate the significance of the additional territory as barrier for migratory species that are affected by it, for example Gavia sp. Also, the core territory overlaps with the zone, which is mapped with great importance for bird.
 - The State Environmental Service asks to pay special attention to possible impacts on bird and bat migration routes and resting places, and to find the best/growing technical solutions (alternative) to minimise negative impacts in the future research.

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

Sincerely yours,

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

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