



Vides pārraudzības valsts birojs

Environment State Bureau of the Republic of Latvia

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26.06.2024 No. 5-05/834/2024

Ref. to: 02.05.2024. No 6-3/24/1892-2

The Ministry of Climate of the Republic of Estonia

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Regarding the transboundary environmental impact assessment for the offshore wind farm project “ELWIND (Estonia)”

The Environment State Bureau (hereinafter – the Bureau), acting as a Point of Contact regarding Notification in accordance with Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (hereinafter – the Espoo Convention) of Latvia 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 notification sent concerning the environmental impact assessment (hereinafter – the EIA) for the offshore wind farm project “ELWIND (Estonia)” (hereinafter – the Project) with reference to Article 3 of the Espoo Convention.

The Bureau hereby 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 Latvia intends to take part in the proceedings on the EIA and transboundary consultations as an affected party.

Please be informed that the Bureau published received information regarding the Project on the Bureau's webpage¹ on 7 May 2024 and sent information directly to the involved authorities. The Bureau received opinions regarding participation in the transboundary consultations within the scope of competence from the Ministry of the Climate and Energy of the Republic of Latvia, the Ministry of Foreign Affairs of the Republic of Latvia, the Ministry of Interior of the Republic of Latvia, the Ministry of Health of the Republic of Latvia, the Ministry of Transport of the Republic of Latvia, the Ministry of the Agriculture of the Republic of Latvia, the State Environmental Service, the Nature Conservation Agency, the Latvian Institute of Aquatic Ecology and the Kurzeme Planning Region. The Bureau has not received comments from the public.

¹<https://www.vpvb.gov.lv/lv/parrobezu-ietekmes-uz-vidi-novertejumu-projekti/atkrastes-veja-parka-elwind-igaunija-buvnieciba-baltijas-jura>

Below mentioned authorities highlighted aspects that need to be stressed and foreseen in the transboundary EIA of the Project or provided more detailed comments regarding transboundary impact:

- The Ministry of Transport of the Republic of Latvia invites the Ministry of Climate of the Republic of Estonia to take into account the areas reserved for navigation specified in the Maritime Spatial Plan of Latvia when planning wind farms at sea.
- The Ministry of Agriculture of the Republic of Latvia shared opinion that the Project could affect the interests of Latvian fishermen, since they also fish in the waters of the exclusive economic zone of the Republic of Estonia, as well as use the same fish resources. As part of the EIA process, it would be necessary to evaluate the impact of the construction of offshore wind farms on marine habitats, fish migration, fish spawning grounds.
- The Ministry of Health of the Republic of Latvia shared opinion the Project will not have an impact on the human health.
- In the view of the State Environmental Service it is necessary to evaluate the Project also in the context of the national level long-term territory development planning document “Jūras plānojums 2030 / the Maritime Spatial Plan of Latvia (approved by Cabinet of Ministers order No. 232 of May 21, 2019)² and in the following planning and evaluation to pay special attention to the effects on birds and bats (including for the study of their migration routes), fish and marine mammals (including for the study of their feeding and breeding places), as well as in research to find the best/most sparing technical solutions (alternatives) for minimizing negative impacts and possible accident risks. The State Environmental Service also asks to evaluate the current practice in preventing pollution risks (with oil products, etc.) in the sea waters of wind farms during construction and operation, setting appropriate guidelines for the implementation of projects, it would also be necessary to evaluate the risks and consequences of planned infrastructure, incl. in case of malicious damage.
- The Nature Conservation Agency as a competent authority on nature protection of the Republic of Latvia (hereinafter – the Agency) draws attention to the following:
 1. The intended area of operation is located in the Baltic Sea, and approximately 6 km to the south of the intended area of operation is the Natura 2000 site and the protected marine area “Irbes saurums” (LV0900300)³, designated mainly for the protection of birds. It is important site for migratory birds, e.g. *Gavia stellata*, *Gavia arctica*, *Melanitta fusca*, *Melanitta nigra*, *Clangula hyemalis*, *Larus minutus*, there are found such species as the *Alca torda*, *Hydrocoloeus minutus*, *Mergus serrator*, etc. Therefore, the potential impact of the offshore wind farm “ELWIND (Estonia)” on the Natura 2000 territory shall be evaluated.
 2. The protected marine area “Irbes šaurums” is an internationally important place for birds (an important wintering place, resting place during migration and constitutes the so-called migration “bottleneck place”). When assessing the potential effects of the wind farm “ELWIND (Estonia)”, it must be taken into account and the impact on migratory and wintering birds in this area should also be assessed. The possible impact of the construction and operation of the interconnection on migratory and wintering birds and bird feeding habitats should also be assessed. Construction work should be planned during the summer period, thus reducing the impact on wintering birds.
 3. It is planned to build an intermediate connection (cable line approximately 100 m wide

² <https://likumi.lv/ta/id/306969-par-juras-planojumu-latvijas-republikas-ieksejiem-juras-udeniem-teritorialajai-jurain-ekskluzivas-ekonomiskas-zonas>

³ “Irbes šaurums” (LV0900300) NATURA 2000 - STANDARD DATA FORM
<https://natura2000.eea.europa.eu/Natura2000/SDF.aspx?site=LV0900300>

between the planned “ELWIND (Latvija)” wind farm and the intended area of operation), which would cross the protected marine area “Irbes šaurums”. The place of the interconnection is not specifically indicated, but taking into account information available in various sources, the length of the crossing may exceed 30 km. Also, the planned fourth interconnection between Latvia and Estonia would also cross the research territory of the LIFE REEF project “Research of marine protected habitats in EEZ and determination of the necessary conservation status in Latvia”⁴.

4. In addition, the Agency points out that there must be evaluated possible cumulative effects that could be caused by the wind farms “Liivi 1” and “Liivi 2”.
- The Kurzeme Planning Region points out that planned offshore wind farm “ELWIND (Estonia)” may have a substantial impact on the existing safety of navigation, shipping areas in the Baltic Sea, accessibility to/from Latvian harbours and potential risks of marine pollution in case of accidents or ship collisions, with possible impacts on the Baltic Sea and its habitats. One of these risks is the creation of a connection with “ELWIND (Latvia)”, the possible location of which is envisaged in Latvian territorial waters opposite Pāvilosta. The creation of the connection could affect the two existing marine protected areas and Natura 2000 sites “Irbes šaurums” and “Akmeņraga sēklis”, as well as two currently identified potential marine protected areas “Zēģelniķu sēklis” and “Alku sēklis”, which could contain specially protected biotopes of European Union importance “1110 Sandbanks which are slightly covered by sea water all the time” and “1170 Reefs”. These areas are located at a depth of around 20 to 45 m and could have a significant impact if both offshore wind farms ELWIND are connected.

The Kurzeme Planning Region noted that ELWIND is a joint cross-border offshore wind farm project in the Baltic Sea, a Steering committee with representatives from Latvia and Estonia has been established to make strategic decisions on the progress of the project and the environmental impact assessment. From this point of view, all activities related to the creation of a connection between two offshore wind farms in Estonia and Latvia must be mutually coordinated and carefully scrutinised as part of the EIA process.

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 secure electronical signature and contains a time stamp*

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⁴ LIFE19 NAT/LV/000973 <https://reef.daba.gov.lv/public/>