



Vides pārraudzības valsts birojs

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The Ministry of Climate of the Republic of Estonia

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Regarding the transboundary environmental impact assessment for the offshore wind farm projects “Liivi 1” and “Liivi 2” in the Gulf of Riga

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 projects “Liivi 1” and “Liivi 2” in the Gulf of Riga (hereinafter – the Projects) by the developer UAB „Ignitis renewables projektai 6” 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 Projects and the possibility of transboundary impacts, we hereby confirm that Latvia intends to take part in the proceedings on the EIA of the Projects and transboundary consultations as an affected party.

Please be informed that the Bureau published received information regarding the Projects 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 Environment Protection and Regional Development, 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

¹<https://www.vpvb.gov.lv/lv/parrobezu-ietekmes-uz-vidi-novertejumu-projekti/atkrastes-veja-parku-liivi-1-un-liivi-2-buvnieciba-rigas-juras-lici-igaunija>

of the Republic of Latvia, the Ministry of Transport of the Republic of Latvia, the Ministry of Economic 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.

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

- The Ministry of Environmental Protection and Regional Development informs that in LIFE19 NAT/LV/000973 REEF “Research of marine protected habitats in EEZ and determination of the necessary conservation status in Latvia” project (led by the Nature Conservation Agency, still going this year) over a two-year period, aerial surveys of birds were carried out in the partial territory of sea waters of the exclusive economic zone of the Republic of Latvia (not all). We consider that those data might be useful for studies in the environmental impact assessment process of wind parks (for data, if needed, please contact project leader – the Nature Conservation Agency (<https://reef.daba.gov.lv/public/eng/contacts/>)).
- 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 Projects 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 Projects will not have an impact on the human health.
- After evaluating the submitted information, the State Environmental Service concludes that wind farms are planned within approximately 20 – 35 km of the Latvian coast (and the nearest residential houses in Kolka parish, Talsi District Municipality), and approximately 5 km from the exclusive economic zone of Latvia, which is also a specially protected nature area (including Natura 2000) – the protected marine area “Irbes šaurums”, which is recognised as an important place for cross-border birds. The State Environmental Service noted that planned wind farms could be visible from the Latvian coast.

In the view of the State Environmental Service it is necessary to evaluate the Projects 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), to changes in the landscape and the flickering effect (including the visibility of wind farms from the coast of Latvia, especially from the scenically valuable Kolkasrags), 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

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

infrastructure, incl. in case of malicious damage.

- The Kurzeme Planning Region points out that the location of the offshore wind farms “Liivi 1” and “Liivi 2” in the northern part of the Gulf of Riga and the planned large area of the wind farms in the sea (192,6 km²) may significantly affect the existing shipping areas, regulations and safety, as well as the availability of maritime transport and recreational vessels access to/from the ports of Latvia. In the case of accidents or ship collisions, there is also a potential risk of marine pollution that may affect the Baltic Sea and its habitats.
- The Nature Conservation Agency as a competent authority on nature protection of the Republic of Latvia (hereinafter – the Agency) draws attention to the following:
 - The offshore wind farms “Liivi 1” and “Liivi 2” are located approximately 8 km from the waters of the Economic Exclusive Zone (hereinafter – the EEZ) of the Republic of Latvia, 9 km from the protected marine area (hereinafter – PMA) “Irbes šaurums” (LV0900300)³ and approximately 20 km from the PMA “Rīgas līča rietumu piekraste” (LV0900400)⁴. Both territories are also Natura 2000 sites designated for the protection of birds, therefore the potential impact of the wind farms on Natura 2000 areas from birds’ perspective must be assessed.
 - The PMA “Rīgas līča rietumu piekraste” is an important site for *Gavia sp.*, which uses it during the post-nesting period. Effects of the wind farms on *Gavia sp.* is being studied within the DIVER project⁵ and the 2022 data clearly show that *Gavia sp.* uses the Gulf of Riga. Already published studies shows that *Gavia staellata* is sensitive to disturbance from offshore wind farms, it suffers from habitat loss⁶ and migration patterns of *Gavia staellata* show that it is essential to protect all important places along the migration path, as the species' ability to adapt to environmental changes is low. Disruption of wind farms can cause a significant impact on the population⁷.
 - The PMA “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 park, it is definitely necessary to take into account and evaluate the effects on migrating and wintering birds.
 - The potential impact of the construction and operation of the interconnector corridor on migratory and wintering birds, as well as bird feeding habitats, should be assessed during impact assessment analysis. Construction works should be planned in the summer period, thus reducing the impact on wintering birds.
 - In the context of birds, the planned wind farm “ELWIND (Estonia)” must be taken into account from cumulative aspect. It is necessary to evaluate the cumulative effects that might occur together with other planned wind farms, especially regarding to migrating and wintering birds.

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

⁴ “Rīgas līča rietumu piekraste” (LV0900400) NATURA 2000 - STANDARD DATA FORM
<https://natura2000.eea.europa.eu/Natura2000/SDF.aspx?site=LV0900400>

⁵ DIVER project <https://www.divertracking.com/en/tracking-map/>

⁶ Heinänen, S., Žydelis, R., Kleinschmidt, B., Dorsch, M., Burger, C., Morkūnas, J., Quillfeldt, P. and 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, p.104989.
<https://www.sciencedirect.com/science/article/pii/S0141113619308207>

⁷ Kleinschmidt, B., Burger, C., Bustamante, P., Dorsch, M., Heinänen, S., Morkūnas, J., Žydelis, R., Nehls, G. and Quillfeldt, P., 2022. Annual movements of a migratory seabird—the NW European red-throated diver (*Gavia stellata*) – reveals high individual repeatability but low migratory connectivity. *Marine Biology*, 169(9), p.114.
<https://link.springer.com/article/10.1007/s00227-022-04096-x>

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

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