



Vides pārraudzības valsts birojs

*Environment State Bureau of the Republic of Latvia*

---

Rūpniecības iela 23, Rīga, LV-1045, Latvia, phone +371 67321173, e-mail [pasts@vpvb.gov.lv](mailto:pasts@vpvb.gov.lv), [www.vpvb.gov.lv](http://www.vpvb.gov.lv)

Rīga

07.10.2024 No. 5-01/1153/2024

Ref. to: 06.08.2024 No 6-3/24/1892-11

**The Ministry of Climate of the Republic of Estonia**

e-mail: [info@kliimaministerium.ee](mailto:info@kliimaministerium.ee)

**cc: the Ministry of the Climate and Energy of the Republic of Latvia**

e-mail: [pasts@kem.gov.lv](mailto:pasts@kem.gov.lv)

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

The Environment State Bureau (hereinafter – the Bureau) would like to express gratitude to the Ministry of Climate of the Republic of Estonia for the environmental impact assessment (hereinafter – the EIA) Programme<sup>1</sup> for the offshore wind farm project “ELWIND (Estonia)” (hereinafter – the Project).

We inform that public participation of the EIA Programme of the Project in Latvia was organized from 12 August 2024 until 30 September 2024. Information regarding the prepared EIA Programme of the Project and public participation options was published on the Bureau`s webpage<sup>2</sup> and send directly to the various stakeholders considering the national procedure of the EIA in the transboundary context. Please be informed that the Bureau has received response 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 Health of the Republic of Latvia, the Ministry of Smart administration and Regional Development of the Republic of Latvia, the Ministry of Agriculture of the Republic of Latvia, the Ministry of Economics of the Republic of Latvia, the Ministry of Interior of the Republic of Latvia in cooperation with the State Fire and Rescue Service, the Nature Conservation Agency, the State Environmental Service. The Bureau has not received comments from the public.

Considering that Estonia`s proposal of organizing a separate public discussion for the Latvian State

---

<sup>1</sup> The Bureau`s registration No 5-05/2252/2024 from 06.08.2024.

<sup>2</sup><https://www.vpvb.gov.lv/lv/parrobezu-ietekmes-uz-vidi-novertejumu-projekti/par-ietekmes-uz-vidi-novertejumu-zviedrijas-atkrastes-veja-elektrostaciju-parka-neptuni-buvniecibas-projektam-baltijas-jura>

Institutions as a part of the transboundary EIA procedure of the Project, during public participation process the Bureau asked involved authorities to provide opinion / interest towards offered public discussion by latest until 21 August 2024. Within the given timeframe the Bureau received opinions from 4 authorities towards public discussion. The Bureau summarized opinions received and on 23 August 2024 informed Estonia that according to the opinions received written format for public participation of the EIA Programme is sufficient in this stage of EIA, interest from authorities regarding necessity of public discussion was relatively little.

Please find below comments received from authorities regarding the EIA Programme.

The Ministry of Transport of the Republic of Latvia provided the following comment. It is indicated in the EIA Programme “Table 9-2. Feedback from neighbouring countries on the assessment of potential transboundary environmental impacts following the initiation of the EIA programme” that the proposal of the Ministry of Transport of the Republic of Latvia to consider the areas reserved for navigation specified in the Maritime Spatial Plan of Latvia when planning wind farms at sea will be taken into account. At the same time the EIA Programme, section 4.2.4 “Water traffic” provides information that “the vast majority of the area proposed for the offshore wind farm is not of significant importance for water traffic, but a shipping corridor passes through the southernmost spot of the area (Figure 4-14). These are mainly cargo ships sailing from the ports of the Gulf of Riga (Riga, Pärnu, etc) to the international shipping lane, and vice versa.” The Ministry of Transport of the Republic of Latvia opposes the mentioned statement that the area proposed for the offshore wind farm is not of significant importance for water traffic. According to the information provided in the EIA Programme the Ministry of Transport of the Republic of Latvia concludes that the Project territory is crossed by an important shipping corridor used by thousands of cargo ships per year, including container ships from/to the Port of Riga to/from the ports of the Gulf of Finland. Therefore, the Ministry of Transport of the Republic of Latvia invite the project developers to respect the existing shipping corridor in Estonian waters by reserving it for navigation and thus ensuring connection with the areas reserved for navigation in Latvian waters (as indicated in the Maritime Spatial Plan of Latvia), and to make appropriate adjustments to the Project`s development plans.

The Ministry of Health of the Republic of Latvia concluded that considering the distance of the wind farm “ELWIND (Estonia)” from the land coast of Latvia areas, impact on the health of coastal residents of Latvia is not expected.

The Ministry of Agriculture of the Republic of Latvia considers that the EIA programme includes sufficiently detailed information related to the fish resources.

The Nature Conservation Agency and the State Environmental Service concluded that their comments expressed during public information process of the notification stage of the Project have been considered in the EIA Programme. Thus, no further clarifications or additions are necessary in the EIA programme of the Project. In addition, the Nature Conservation Agency highlighted that according to the EIA Programme “Table 9-2. Feedback from neighbouring countries on the assessment of potential transboundary environmental impacts following the initiation of the EIA programme” *the fourth connection between Estonian and Latvia is not part of this project and is not covered by this EIA. The impacts of the connection are assessed, where appropriate, in separately initiated EIA and studies.*

The Kurzeme Planning Region expressed the following opinion:

- According to the information provided in the EIA Programme, “The ELWIND is a joint cross-border offshore wind energy project between Estonia and Latvia” and that “in September 2020 the Ministry of Economic Affairs and Communications of the Republic of Estonia and the Ministry of Economics of the Republic of Latvia signed a Memorandum of Understanding (MoU) for the pre-development of a joint offshore wind energy project (hereinafter – the ELWIND agreement).”

- As stated in the EIA Programme, “The aim of the ELWIND agreement is to contribute, in cooperation between countries, to the faster development of offshore wind energy and the increase of electricity transmission capacity between countries and that the significant value of the ELWIND project is the additional electricity-energy inter-connection - the development of a multi-purpose submarine cable (hybrid network) connecting the electricity networks of both countries.” It is specifically underlined that:
  - “The ELWIND project contributes to the European Union’s objective of strengthening cooperation between Member States in the field of renewable energy, as outlined in Directive (EU) 2018/2001 of the European Parliament and of the Council, by being a cooperative project between Estonia and Latvia.”
  - “Among other things, cooperation will be undertaken for the EIA and the conducting of studies.”
  - “Development of a multi-purpose submarine cable (hybrid network) connecting the electricity networks of both countries is co-financed by the European Union” and
  - “The ELWIND project is part of the European Union's priority cross-border renewable energy projects (CB-RES2) list.”
- At the same time, in section 9.3 of the EIA Programme “Public engagement and overview of the publication of the EIA programme” in response to the indication from the Kurzeme Planning Region and the other authorities of the Republic of Latvia that two marine protected areas and Natura 2000 sites, as well as two potential marine protected areas currently under study, could be significantly affected by construction of the planned fourth ELWIND connection between Latvia and Estonia, it was noted that: “a fourth link between Estonia and Latvia is not part of this project and is not considered in this EIA. The impacts of the connection are assessed, where appropriate, in separately initiated EIA and studies.”
- Although it is stated that: “The development of both offshore wind farms, including the EIA, will be carried out separately according to Estonian and Latvian legislation, but as it is a joint project, cooperation in ordering and conducting studies and other related activities will be undertaken whenever possible”, the Kurzeme Planning Region concludes that the EIA of the Project does not assess the overall environmental impact of the proposed activity and that the statement made is therefore not consistent with the nature of a joint cross-border offshore wind project. The ELWIND joint project involves also the construction of a multi-functional offshore cable (hybrid grid) to increase the electricity transmission capacity between Estonia and Latvia, and this connection is an essential part of the project.
- Formally dividing the joint cross-border offshore wind project into separate parts - ELWIND (Estonia), ELWIND (Latvia) and the multi-purpose offshore cable - and carrying out separate EIA procedures for each of them, excludes the cumulative impact of this international project on the Baltic Sea area, habitats and the protected areas.
- The Kurzeme Planning Region concludes that the development of the ELWIND agreement as a joint cross-border offshore wind energy project between Estonia and Latvia and its potential environmental impacts should be considered in terms of its actual impact and in a broader context, assessing and evaluating the common cumulative impacts of both the offshore wind farms and the planned multi-purpose offshore cable on the Baltic Sea, as well as, the coastal areas of both countries.
- The Kurzeme Planning Region would also like to draw the attention of the planned offshore wind farm projects in the Gulf of Riga - Liivi 1 and Liivi 2. According to the information available to the Kurzeme Planning Region, EIA procedures have been initiated for offshore wind farms. In the chapter 9.3 of the EIA Programme, to the statement of the Nature Conservation Agency that the “possible cumulative impacts with the Liivi1 and Liivi2 wind

farms should be assessed” an explanation is provided: “The cumulative impacts with Liivi1 and 2 wind farms can be assessed if the studies and impact assessments of Liivi 1 and 2 have been completed by the time of the completion of the EIA report of the ELWIND wind farm.” Taking into account that EIA procedures for all three offshore wind farms - ELWIND (Estonia), Liivi 1 and Liivi 2 - have started almost simultaneously, it is important to consider and assess their all the potential cumulative impacts on the Baltic Sea environment, habitats, biotopes and marine protected areas.

The Investment and Development Agency of Latvia, the developer of the offshore wind farm project “ELWIND (Latvia)”, confirmed that authority is acquainted with the EIA Programme and has no proposals regarding the scope of the EIA of the Project in the context of transboundary impacts. In addition, the Investment and Development Agency of Latvia asked to note that sections 2.3 of the EIA programme of the Project Figure 2-1 of the “Place where the planned activity is envisaged” shows previous area of the offshore wind farm project “ELWIND (Latvia)” (the current location of the site is shown in the first attachment of the Bureaus letter No 5-05/1004/2024 from 23.08.2024. “Regarding supplementary notification of the environmental impact assessment for activity listed in the Appendix I of the Espoo Convention – the offshore wind park ELWIND (Latvia)”). The Investment and Development Agency of Latvia informed that the change of coordinates of the area of the offshore wind farm “ELWIND (Latvia)” will not affect the EIA process of the Project, and the requirements laid down in the EIA Programme.

Other institutions informed they had no comments or proposals for the EIA Programme of the Project concerning the scope for the assessment of the environmental impacts of the Project.

Yours sincerely,

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

*\* Document is signed with secure electronical signature un contains a time stamp*

Ilze Lielvalode, +371 67770813  
ilze.lielvalode@vpvb.gov.lv