



Energētikas un vides aģentūra

Energy and Environment Agency

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The Ministry of Climate of the Republic of Estonia

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Regarding the environmental impact assessment of the submarine cable of the fourth electricity connection between Estonia and Latvia (developer Elering AS)

The Energy and Environment Agency (hereinafter – the Agency), 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 regarding project planned by the developer Elering AS to construct the submarine cable of the fourth electricity connection between Estonia and Latvia (hereinafter – the Project) with reference to Article 3 of the Espoo Convention.

The Agency hereby acknowledges receipt of the notification and prepared documentation¹. 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 of the Project as an affected party.

Please be informed that the Agency published received information regarding the Project on Agency's webpage² on 20 February 2025 and sent information directly to the involved authorities. The Agency received opinions regarding the Project and its potential transboundary impacts within the scope of competence from the Ministry of Climate and Energy of the Republic of Latvia, the Ministry of Foreign Affairs of the Republic of Latvia, the Ministry of Transport of the Republic of Latvia, the Ministry of Interior of the Republic of Latvia in co-operation with the State Fire and Rescue Service and State Border Guard of the Republic of Latvia, the Ministry of Agriculture of the Republic of Latvia, the Ministry of Health of the Republic of Latvia, the Nature Conservation Agency, the State Environmental Service, the

¹ Received on 13 February 2025, registration No 2.10/269/2025-S.

² <https://www.eva.gov.lv/lv/parrobezu-ietekmes-uz-vidi-novertejumu-projekti/ceturta-igaunijas-latvijas-elektroparvades-tikla-starpsavienojuma-izbuve-igaunijas-juras-udenos>

Kurzeme Planning Region, the Talsi District Municipality. The Agency 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 Project or provided more detailed comments regarding transboundary impact:

The Ministry of Foreign Affairs of the Republic of Latvia provided opinion that the Project may have transboundary impacts on various aspects, the Ministry supports the necessity for Latvia to participate in the transboundary EIA consultation process of the Project.

The Ministry of Climate and Energy of the Republic of Latvia considers that does not see the need to participate in the process of transboundary consultation of the EIA of the Project. However, the Ministry would highly appreciate to receive information regarding the results of the EIA of the Project.

The Ministry of Transport of the Republic of Latvia concludes that the process of laying submarine cables could affect ship traffic through the Irbe Strait and near the Saaremaa Island in the Baltic Sea to/from Latvian ports. Therefore, the Ministry of Transport of the Republic of Latvia kindly requests that a study of the impact on ship traffic during the laying of submarine cables in the Baltic Sea is required within the framework of Project's EIA.

The Ministry of Agriculture of the Republic of Latvia informs that within the scope of its competence the Ministry has become acquainted with the information provided by the Ministry of Climate of the Republic of Estonia regarding the Project, which could also affect the interests of Latvian fishermen because they use the same fish resources, and believes that it would be useful for the Republic of Latvia to participate in the transboundary EIA procedure.

In addition, the Ministry of Agriculture of the Republic of Latvia notes that Decision No 1-7/24-422 of the Consumer Rights Protection and Technical supervision Agency of the Republic of Estonia of 23 December 2024 *on the initiation of the EIA procedure* includes sufficiently detailed information on planned studies within EIA of the Project related to fish resources.

The Ministry of Health of the Republic of Latvia considers that does not see the need to participate in the process of transboundary consultation of the EIA of the Project regarding the human health. The Ministry of Health of the Republic of Latvia has no proposals for the scope of the EIA of the Project.

The Nature Conservation Agency concludes that the planned submarine cable will pass through protected marine areas within the *Natura 2000* network, *Kura Kurgi (EE0040434)* and *Irbe Strait (LV0900300)*, which are also a significant site for birds. It is an important wintering and resting place during bird flyovers, as well as the so-called "bottle neck spot" of migrations. The most important species of waterfowl in need of protection are red throated loon *Gavia stellata* and arctic loon *Gavia stellata/arctica*, velvet scoter *Melanitta fusca*, common scoter *Melanitta nigra*, long-tailed duck *Clangula hyemalis*, little gull *Larus minutus* and black guillemot *Cephus grylle*.

Considering that that the exact location of the fourth electricity connection between Estonia and Latvia and other technical details regarding its location on the Latvian side are not available, then temporarily extending the planned cable corridors from Estonia on a straight line in the direction of Dundaga, can be concluded that they would cross approximately 14 – 18 km in the protected marine area *Irbe Strait*, while in the direction of Ventspils the crossing would be approximately 35 km long. In the case of Ventspils, it would cross the biotope of the European Union importance *Rock shoals in the sea (1170)*, which is proposed provisionally as a nature reserve zone in the marine protected area as a result of research of project LIFE19

NAT/LV/000973 REEF “Research of marine protected habitats and determination of the necessary conservation research status in the exclusive economic zone of Latvia”. It is also provisionally planned to propose to the protected marine area *Irbe Strait* a seasonal closure for birds. If the Project is carried out after several years, then it is possible that at that time scientific proposals regarding the coverage and exclusion zones of marine protected areas will be corroborated by regulatory enactments.

The Nature Conservation Agency informs that currently, the procedures for the protection and use of the protected marine territory *Irbe Strait* are determined by the Cabinet Regulation No. 807 of 19 October 2011 “Individual Protection and Use Regulations of the Protected Marine Territory *Irbe Strait*”, which allows to insert cable.

In addition, the Nature Conservation Agency notes that according to the national level long-term spatial development planning document “Maritime Plan 2030” (which has been approved by Cabinet of Ministers order No. 232 of 21 May 2019) Corridor of perspective electricity cable (K4) is planned from / to Kolka.

Although the Nature Conservation Agency considers that it is not necessary to participate in the transboundary EIA procedure as an affected party, the Nature Conservation Agency would like to receive the EIA report and to get acquainted with the research results of the study on the impact of the Project on protected marine areas *Kura Kurgi* and *Irbe Strait*, including analysis of how the planned cable corridor will cumulatively impact the migration routes/corridors of fish, marine mammals, bats and birds, and the specially protected species found in Natura 2000 areas.

The State Environment Service concludes that the Project may affect maritime territories located in the Exclusive Economic Zone of Latvia Republic. The State Environment Service also sees a need to assess the Project in the context of the national planning document “Maritime Plan 2030” and during further planning and assessment to pay particular attention to impacts on fish and seabirds (including research of breeding and feeding sites thereof), other marine fauna and flora (including impacts from cloudiness caused by excavation works), for the lifting and distribution of possible heavy metal contamination on the seabed. The State Environment Service asks to consider an alternative to lay cables on the seabed without digging. Considering that two of the currently planned route options (to Dundaga) may no longer be considered in Latvia, it is recommended to consider the usefulness of such alternative further research.

The Kurzeme Planning Region supports the necessity for Latvia to participate in the transboundary EIA consultation process of the Project.

The Talsi District Municipality notes that two alternative submarine cable corridors are connected with Dundaga in the Talsi District and, in case of construction of the 330 kV line, it will cross the Nature 2000 sites *Slītere National Park (LV0200300)* in Kolka Parish, Talsi District or the territory of the Nature Reserve *Ances Marshes and Forests (LV0523400)* in Ances Parish, Ventspils District Municipality. The Talsi District Municipality considers participation in the EIA necessary and useful, as well as highlights to take significant account of the importance of specially protected nature areas in the construction of the power transmission network line without reducing their biodiversity.

AS “Augstsprieguma tīkls”, Latvian transmission system operator, underlines, that the fourth Estonian - Latvian interconnection project (hereinafter – the 4th EE-LV interconnection) is a joint development project of the Latvian and Estonian transmission system operators AS “Augstsprieguma tīkls” and Elering AS. The joint technical studies were conducted for the 4th EE-LV interconnection project in 2022-2023 and continue to actively cooperate in the development of this project. AS “Augstsprieguma tīkls” informs about initiated the EIA

procedure for the Ventspils-Broceni-Varduva (LT) internal network strengthening project in territory of Latvia, which is one of the preconditions for the construction of the 4th EE-LV interconnection. AS “Augstsprieguma tīkls” also informs that in March 2024, based on the internal technical studies, AS “Augstsprieguma tīkls” and Elering AS agreed to continue developing the 4th EE-LV interconnection scenario from Saaremaa in Estonia to Ventspils in Latvia, excluding the Dundaga landing option in Latvia from the potential future development scenarios.

According to the AS “Augstsprieguma tīkls”, strengthening of the onshore network in Estonia will not affect the territory of Latvia, but the construction of the submarine cable in the territorial waters of Estonia and Latvia and the precise landing options will be agreed upon by the operators of both countries during the project development. The prefeasibility studies are planned on the possibilities of connecting the offshore cable to the existing onshore electricity transmission network on the Latvian side in cooperation with Elering AS. The joint AS “Augstsprieguma tīkls” and Elering AS EIA of the 4th EE-LV interconnection at sea is planned to be launched after 2027, prior to which consultations will be carried out with the competent environment authorities of Latvia and Estonia.

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

Enclosure: 8 documents (files: Talsi District Municipality_submarine cable.pdf, State Environment Service_submarine cable.pdf, Ministry of Transport_submarine cable.pdf, Nature Conservation Agency_submarine cable.pdf, Ministry of Foreign Affairs _submarine cable.pdf, Ministry of Agriculture_submarine cable.pdf, Augstspriegumatīkls_submarine cable _ENG.pdf, Ministry of Health _submarine cable.pdf).

Sincerely yours, Director

D.Avdejanova

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CONTAINS TIME- STAMP

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