



Vides pārraudzības valsts birojs
Environment State Bureau of the Republic of Latvia

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Rīga

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The Ministry of Climate of the Republic of Estonia
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cc: Ms. Birgit PARMAS
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Regarding the environmental impact assessment of the planned offshore wind farm in Area 1 and Area 2 in the Gulf of Riga (developer Liivi Offshore OÜ)

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 regarding the planned offshore wind farm in Area 1 and Area 2 in the Gulf of Riga (hereinafter – the Project) with reference to Article 3 of the Espoo Convention.

The Bureau hereby acknowledges the 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 Bureau published received information regarding the Project on Bureau`s webpage² on 8 October 2024 and sent information directly to the involved authorities. The Bureau 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 Smart Administration and Regional Development 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, the Ministry of Agriculture of the Republic of Latvia, the Ministry of Health of the Republic of Latvia, the Nature Conservation

¹ Received on 3 October 2024, registration no 5-05/2737/2024.

² <https://www.vpvb.gov.lv/lv/parrobezu-ietekmes-uz-vidi-novertejumu-projekti/igaunijas-atkrastes-veja-elektrostaciju-parka-buvnieciba-pirmaja-un-otraja-apgabala-rigas-juras-lici>

Agency, the State Environmental Service, Latvian Institute of Aquatic Ecology. 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 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, and the location of the Project borders the territory of the planned offshore wind park *Liivi Gulf* planned by *Eesti Energia AS*, where Latvia has approved participation in the transboundary EIA as the affected party, the Ministry supports the necessity for Latvia to participate in the transboundary EIA consultation process of the Project.

The Ministry of Health of the Republic of Latvia assumes that the Project will not have a direct impact on the territory of the Republic of Latvia in terms of human health. But considering the proximity to the territory of Latvia, there could be risks of potential pollution during the construction and maintenance process. The Ministry of Health of the Republic of Latvia has the following proposals for the scope of the EIA of the Project in the context of transboundary impacts: the EIA must include a risk assessment of the possible transboundary risk to human health from substances that could get into the sea water, e.g. according to the Annex 4 of the Ministry of Climate of the Republic of Estonia Notification paragraph 41, sub-paragraph 5, it is planned that a seawater quality test will be carried out. It needs to be detailed exactly at which stages of the building mentioned analysis will be carried out and which parameters will be included in the water quality assessment to determine the possible risk of water pollution during construction and maintenance of the offshore wind park. It is also necessary to indicate whether and which chemical substances or mixtures will be used in the construction, installation, maintenance of the wind turbines and its equipment and what other potentially polluting substances from the building process can or cannot enter the seawater and their amounts. For example, corrosion protection substances and coatings containing any heavy metals, hydraulic fluids, cleaning and maintenance chemicals. The Ministry of Health of the Republic of Latvia kindly asks to include an analysis of sea currents and winds and how and after how long the possible pollution, if it gets into the seawater from any accident in the wind farm or during its construction, will spread in the sea water. The assessment is needed on whether and after how long it will get into the coastal waters of Latvia. The closest public official beach on the Latvian side is the “Ainaži” beach, which is located 2 km from the Estonian border, in the territory of the Nature reserve “Randu pļavas” nature reserve, at the inlet of the river “Blusupīte” in the Gulf of Riga.

The Ministry of Transport of the Republic of Latvia concludes that according to the information provided for in the Annexes of the Notification, the area of the planned offshore wind park will boarder the territorial sea and the Exclusive Economic Zone of the Republic of Latvia in the Gulf of Riga. The planned offshore wind park will be in close proximity to *the wind park study area E5* and *areas reserved for shipping* from Latvian ports, including to the port of Pärnu, as indicated in the Maritime Spatial Plan 2030 of Latvia³ (hereinafter – the Maritime Spatial Plan). Therefore, the Ministry of Transport of the Republic of Latvia kindly asks to ensure that the planned offshore wind park, including protection zones, will not affect shipping traffic. In addition, please ensure that the protection zones of the offshore wind park`s underwater cables, including the connection to the mainland, are located in the territorial waters of the Republic of Estonia, to ensure, on a parity basis, the possibility of developing the similar offshore wind park project in the territory of Latvia close to the maritime border between Latvia and Estonia. In the document “White Paper on Offshore Wind Energy”, available at the Vision and Strategies Around the Baltic Sea (VASAB) website, it is recommended to establish a safety distance between the shipping lanes and the wind

³ Approved by Cabinet of Ministers order No 232 of 21 May 2019, <https://likumi.lv/ta/id/306969-par-juras-planojumu-latvijas-republikas-ieksejiem-juras-udeniem-teritorialajai-jurai-un-ekskluzivas-ekonomiskas-zonas>

farm of 2 nautical miles. We propose to consider a possibility to take this recommendation into account and to establish a safety zone of 2 nautical miles between the Maritime Spatial Plan defined *shipping corridor T2* and the planned offshore wind parks. As a part of the studies mentioned in the Annex 4 of the Notification, please provide an assessment of the impact of the planned offshore wind park on the *wind park study area E5* and *area T2 reserved for shipping*, indicated in the Maritime Spatial.

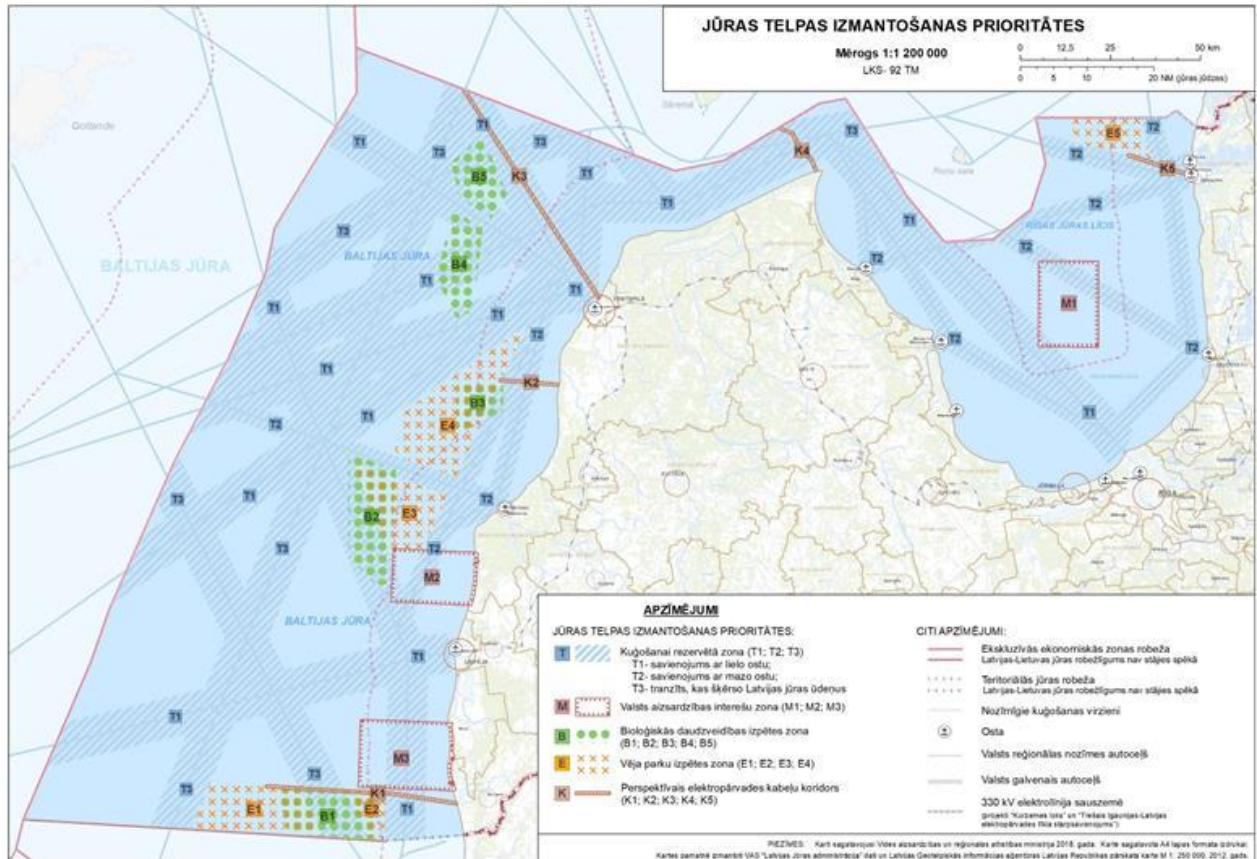


Figure 1. Priorities for the use of the Marine space (the Maritime Spatial Plan).

The Ministry of the Interior of the Republic of Latvia informed that within the scope of its competence aspects of transboundary impacts are not indicated.

The Ministry of Agriculture of the Republic of Latvia would like to inform 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 1-07/24-307 of the Consumer Rights Protection and Technical supervision Agency of the Republic of Estonia of 6 September 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 Smart Administration and Regional Development of the Republic of Latvia has become acquainted with the documents and informs that, in its opinion, when assessing the distance of the planned construction site of the wind farm from the State border of Latvia and its potential impact on the natural values detected in the Gulf of Riga sea space, there is a need to engage in procedures for the assessment of transboundary environmental impact. The Ministry is

interested to receive information regarding the results of the assessments, especially regarding the data of the Gulf of Riga marine space, which would be useful for the intended updating process of the Maritime Spatial Plan, and adverse transboundary impact, if it is detected during the EIA. The Ministry informs that in the 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 ongoing this year) aerial surveys of birds, as well as underwater research (habitats, fish etc.) were carried out in the marine waters of the Exclusive Economic Zone of the Republic of Latvia, next to the development area of the planned offshore wind farm. Data collected in the REEF project shows various natural values (birds, protected habitats etc.) near the Project area. Therefore, the Ministry of Smart Administration and Regional Development of the Republic of Latvia considers that a transboundary EIA should be carried out.

The Nature Conservation Agency (hereinafter – the Agency) as the competent nature protection institution of the Republic of Latvia draws attention to the following facts:

1. The planned offshore wind park is located a short distance from Latvia's specially protected natural areas: the Northern Vidzeme Biosphere Reserve⁴ and Natura 2000 territories: Nature reserve “Randu pļavas” (LV0509100)⁵, Nature Park “Salacas ieleja” (LV0302200)⁶, Protected marine area “Ainaži – Salacgrīva” (LV0900700)⁷. Nature reserve “Randu pļavas” and Nature Park “Salacas ieleja” are important areas for birds, and even though the Protected marine area “Ainaži – Salacgrīva” was created mainly for the protection of underwater reef habitats, the area also contains protected birds (*Bucephala clangula*, *Mergus serrator*, *Haliaeetus albicilla*, *Clangula hyemalis*, *Mergus merganser*, *Cygnus olor*) and fish (*Lampetra fluviatilis*, *Cobitis taenia*) species, therefore the potential impact of the planned offshore wind park on Natura 2000 areas must be evaluated.
2. The planned offshore wind park borders or faces the Protected marine area “Ainaži – Salacgrīva”. This area is planned to be expanded, as it is important for the wintering *Melanitta sp.* concentration place⁸. According to the data of the 2024 winter aerial surveys, *Clangula hyemalis*, *Bucephala clangula*, *Mergus merganser* have been found wintering in front of Ainaži, therefore it can be concluded that the coast in front of Ainaži is a suitable place for wintering birds. The Agency admits that the place of concentration of the above-mentioned birds does not end with the water border of Latvia and continues in Estonia as well. Censuses of wintering birds in Estonia and Latvia⁹ are carried out according to a common methodology, therefore data on the density patterns of wintering birds are available, which should be taken into account when evaluating the effects of the planned offshore wind park and preparing the EIA report.
3. The area is potentially important during bird migration. The wind park would create a barrier effect perpendicular to the migration direction. This is especially important because when migrating across the sea, land birds look for possible resting places. The EIA report must assess the intensity of migration in the vicinity of Kihnu and Ruhnu islands and the coast of Latvia, preferably with radar, so that it is possible to assess whether the islands and shallow seacoasts

⁴ North Vidzeme Biosphere Reserve <https://www.daba.gov.lv/lv/ziemelvidzemes-biosferas-rezervats>

⁵ Randu pļavas (LV0509100) NATURA 2000 - STANDARD DATA FORM <https://natura2000.eea.europa.eu/Natura2000/SDF.aspx?site=LV0509100>

⁶ Salacas ieleja (LV0302200) NATURA 2000 - STANDARD DATA FORM <https://natura2000.eea.europa.eu/Natura2000/SDF.aspx?site=LV0302200>

⁷ Ainaži – Salacgrīva (LV0900700) NATURA 2000 - STANDARD DATA FORM <https://natura2000.eea.europa.eu/Natura2000/SDF.aspx?site=LV0900700>

⁸ The Project “Research of marine protected habitats in EEZ and determination of the necessary conservation status in Latvia” LIFE19 NAT/LV/000973 LIFE REEF <https://reef.daba.gov.lv/public/eng/>

⁹ Monitoring reports of waterbirds wintering in the sea 2016-2024. https://www.daba.gov.lv/lv/biologiskas-daudzveidibas-monitoringa-parskati#Jura_ziemojošo_ūdensputnu_monitorings

are an important factor for attracting migratory birds.

4. Recent studies have shown that the Gulf of Riga is an important feeding and moulting place for *Gavia stellata*. Also, studies have found that *Gavia sp.* are tame birds and are afraid of artificial structures, at a visibility distance of up to 15 km¹⁰. Effects of wind park on *Gavia sp.* is studied within the DIVER project¹¹ and the data clearly show that *Gavia sp.* uses the Gulf of Riga. Already published studies have proven the pronounced sensitivity of *Gavia staellata* to disturbance from offshore wind parks, which manifests itself in habitat loss¹² and migration patterns, indicating that it is essential to protect all important places along the migration path, as the species' ability to adapt to environmental changes is low. Disturbance of a wind park can have a significant effect on the population¹³.
5. The EIA report must assess the potential impact of the construction and operation of the interconnection on migratory and wintering birds, as well as bird feeding habitats.
6. According to the information available to the Agency, the Republic of Estonia has initiated the EIA procedures for several offshore wind farms in the Gulf of Riga. "Liivi1" and "Liivi2", "Saare-Liivi 5" and AS "Eesti Energia" planned wind park "Liivi gulf" and "Tuuletraal OÜ" planned offshore wind park can be mentioned as the closest ones. Therefore, the EIA report should assess the cumulative impact of all these wind parks on the biological diversity of the Gulf of Riga. In addition, it should be taken into account that in the Maritime Spatial Plan, the *wind park research zone E5* is defined for the territorial sea and the Exclusive Economic Zone^{14, 15}.
7. The Agency informs that the construction of an onshore wind park is also planned in the Limbaži District Municipality in the parishes of Salacgrīvas and Viļķenes^{16, 17}. Therefore, the Agency asks to add cartographic material to the EIA reports, which indicates all existing and planned wind parks in the region.
8. The Agency requests that the EIA program provide that monitoring programs and the monitoring data and results obtained after that on natural values must also be submitted to the Agency.

The State Environmental Service concludes that offshore wind parks are planned at a distance of approximately 10 km from the Latvian coast (and the nearest residential houses in the city of Ainaži, Limbaži District Municipality) and next to the maritime border of the Republic of Latvia

¹⁰ Burger, C., Schubert, A., Heinänen, S., Dorsch, M., Kleinschmidt, B., Žydelis, R., Morkūnas, J., Quillfeldt, P. and Nehls, G., 2019. A novel approach for assessing effects of ship traffic on distributions and movements of seabirds. *Journal of environmental management*, 251, p.109511.
<https://www.sciencedirect.com/science/article/pii/S0301479719312290>

¹¹ DIVER project <https://www.divertracking.com/en/home/>

¹² 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>

¹³ 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>

¹⁴ Par Jūras plānojumu Latvijas Republikas iekšējiem jūras ūdeņiem, teritoriālajai jūrai un ekskluzīvās ekonomiskās zonas ūdeņiem līdz 2030. gadam <https://likumi.lv/ta/id/306969-par-juras-planojumu-latvijas-republikas-ieksejiem-juras-udeniem-teritorialajai-jurai-un-ekskluzivas-ekonomiskas-zonas>

¹⁵ Maritime Spatial Plan <https://maritime-spatial-planning.ec.europa.eu/countries/latvia>

¹⁶ Vēja parka "Limbaži" un tā saistītās infrastruktūras projekta īstenošana Limbažu novada Salacgrīvas un Viļķenes pagastos (SIA "Latvijas vēja parki") <https://www.vpnb.gov.lv/lv/ietekmes-uz-vidi-novertejumu-projekti/veja-parka-limbazi-un-ta-saistitas-infrastruktur-projekta-istenosana-limbazu-novada-salacgrivas-un-vilkenes-pagastos-sia-latvijas-veja-parki>

¹⁷ SIA „Latvijas vēja parki” <https://vejaparki.lv/lv/#ivn>

and the border of the Exclusive Economic Zone, as well as approximately 5 km from the specially protected nature territory (Natura 2000) the protected marine territory “Ainaži – Salacgrīva”, which has been established for the protection of underwater reefs and habitats. The intended activity from the Latvian coast could be visible.

After evaluating the submitted information, the State Environmental Service concludes that the planned changes – construction of large wind parks could also affect sea territories located in the Republic of Latvia and the Exclusive Economic Zone. Consequently, the State Environmental Service considers that Latvia should participate in transboundary consultations, as an affected party.

The State Environmental Service sees the need to evaluate the Project also in the context of the national level long-term territory development planning document the Maritime Spatial Plan 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 Ainaži pier), 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.

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 signed with secure electronical signature and contains a time stamp*

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