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State Environmental Service of the Republic of Latvia

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Rīgā

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Regarding the transboundary environmental impact assessment for Expansion of resource extraction at the Griezes I sand deposit, Lithuania

The State Environmental Service (hereinafter – the Service), 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 Environment of the Republic of Lithuania for notification sent concerning the environmental impact assessment (hereinafter – the EIA) for Expansion of resource extraction at the Griezes I sand deposit (hereinafter – the Project) with reference to Article 3 of the Espoo Convention¹.

The Service hereby acknowledges receipt of the notification and prepared documentation. Considering the nature and scope of the Project, the possibility of transboundary impacts, opinions expressed by involved authorities, 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 Service published received information regarding the Project on the webpage² on 30 September 2025 and sent information directly to the involved authorities. The Service received opinions regarding participation in the transboundary consultations 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, the Ministry of Foreign Affairs 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 Agriculture of the Republic of Latvia, the State Centre

¹ Registration No 2.10/3487/2025-S on 26 September 2025.

²<https://www.eva.gov.lv/lv/jaunums/derigo-izraktenu-smilts-ieguves-vietas-paplasinasana-atradne-grieze-1-mazeiku-rajona-pasvaldibas-teritorija-lietuva>

for Defence Military Objects and Procurement, the Nature Conservation Agency and the Saldus Municipality. The Service has not received written 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 Health of the Republic of Latvia noted that according to the information provided in the Notification, it can be concluded that the sand extraction site will be located approximately 120 m from the border between Latvia and Lithuania, opposite the Ezere and Nigrande Districts of Saldus Municipality. Although the planned territory of the Project is located in a non-urbanised rural territory, the nearest residential house is 400 m away in the territory of Latvia. The Ministry of Health of the Republic of Latvia noted that mining process produces the following emissions:

- dust emissions from various mineral activities such as development (excavation) works, handling, and transportation by gravel paving roads. Air pollution is also caused by the operation of machinery engines used in extraction and transport processes, resulting mainly in emissions of nitrogen oxides.
- noise pollution, for example during extraction, processing, reclamation and transportation of the mineral resource, the level of which depends on a number of factors, including the area of the extraction area, the volume of extraction per year, the extraction technologies, the amount of machinery involved, and the level of sound power generated by the technique.

Exceedances of environmental noise limit values in residential building territories are possible both from activities in the field area and during transportation of the mineral resource (sand).

According to the Ministry of Health, the implementation of the Project may potentially cause adverse transboundary impact on human health in the territory of Latvia, thus the Ministry of Health is inviting the EIA to include calculations regarding acoustic noise and total noise caused by the object, as well as an assessment of the impact on air quality (particulate matter PM10, PM2.5 and nitrogen dioxide) in accordance with the binding regulatory enactments³, including measures to reduce polluting activities.

The Nature Conservation Agency (hereinafter – the Agency) notes that:

1. It is necessary to participate in the transboundary consultation process of the EIA for the Project as an affected Party under the Espoo Convention, since the Project may have an impact on the Latvian side.
2. It is not expected that the activity would affect any Natura 2000 sites, natural monuments (dendrological plantings), or EU-protected habitats, excluding freshwater habitats, located on the Latvian side
3. The location of the Project is situated between the confluence of rivers – i.e., where the Varduva River flows into the Venta River. Both rivers are natural, only slightly modified, and meandering; therefore, the Agency is not confident that implementing the Project would not alter the natural riverbeds, as it is not clearly defined at what distance from the rivers it would be safe to establish the quarry. Within the EIA framework, this aspect should also be assessed in the context of surface water quality in both rivers and the potential impact on species inhabiting river rapids.
4. Taking into account that quarrying activities are ongoing and that abandoned quarries exist

³ Cabinet Regulation No. 1290 (Adopted 3 November 2009) Regulations Regarding Ambient Air Quality (<https://likumi.lv/ta/id/200712-noteikumi-par-gaisa-kvalitati>), Cabinet Regulations No 16 (Adopted 7 January 2014) Procedures for noise assessment and Management (<https://likumi.lv/ta/id/263882-troksna-novertesanas-un-parvaldibas-kartiba>).

in the surrounding area, the cumulative impact of all nearby quarries on both the Latvian and Lithuanian sides should be assessed within the EIA framework, particularly regarding the hydrological regime and river water quality, especially if extraction is carried out below the groundwater level and excess water is discharged into the rivers;

5. According to the information available to the Agency, an observation of the natterjack toad (*Epidalea calamita*) was recorded in 2024 in an abandoned quarry near Grieze Manor on the Latvian side. Considering that this species tends to use existing and former quarries as habitats, the Agency believes there is a high probability that it may also occur in the nearby area, including on the Lithuanian side at the site of the Project. Given the unfavorable conservation status of the natterjack toad, the potential impact of the Project on this species should be assessed within the EIA, and if its presence is confirmed, mitigation measures should be planned to improve the species protection.

The Saldus Municipality expressed the opinion that in assessing the transboundary impact of the Project, natural and cultural historical values defined in the territory of Saldus Municipality, as well as the potential impact on the development of water tourism, should be taken into account. The Saldus Municipality calls for respect for the municipality's efforts to impose restrictions on mining in the protective zone of Venta River (detailed opinion is included in enclosed file: *Saldus Municipality_Grieze.pdf*).

To promote effectiveness of public participation process of the EIA report, the Service kindly asks to determine reasonable time for organizing participation process (till 60 days), to determine term for the process of public consultation when elaborated EIA report is discussed (we would highly appreciate possibility to determine this term at least 30 days long), and to compile the proposals submitted by the public and stakeholders. Regarding documentation we kindly ask you to prepare the EIA report in English and the summary of the EIA report in Latvian.

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

Enclosed documents: 3 files (*Saldus Municipality_Grieze.pdf*, *Nature Conservation Agency_Griezes.pdf*, *Ministry of Health_Griezes.pdf*).

Sincerely yours,
Director of Permitting Board

D. Kaleja

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CONTAINS TIME- STAMP

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