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*State Environmental Service of the Republic of Latvia*

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Rīgā

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

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**Regarding the environmental impact assessment of the Rail Baltica railway line section „Kabli – Estonian/Latvian border”**

The State Environmental Service of the Republic of Latvia (hereinafter – the Service) would like to express gratitude to the Ministry of Climate of the Republic of Estonia for the information sent regarding the results of the environmental impact assessment (hereinafter – the EIA) Report of the Rail Baltica railway line section „Kabli – Estonian/Latvian border” (hereinafter – the Project). The Agency hereby acknowledges receipt of the EIA report<sup>1</sup>.

Please be informed that public information and participation process of the EIA Report of the Project in Latvia was organized from 30 September 2025 until 30 October 2025 in written form (gathering the opinions of the institutions, it was concluded that a public/expert meeting is not necessary in the particular case). Information regarding the prepared EIA Report of the Project and public participation options was published in local newspaper “Auseklis”, the webpage<sup>2</sup> and sent directly to the various stakeholders considering the national procedure of the EIA in the transboundary context.

The Service has received response 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 Defence of the Republic of Latvia, the Ministry of Smart Administration and Regional Development 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 Nature

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<sup>1</sup> The registration No 2.10/3331/2025-S from 15.09.2025.

<sup>2</sup><https://www.eva.gov.lv/lv/parrobezu-ietekmes-uz-vidi-novertejumu-projekti/eiropas-standarta-platuma-dzelzcela-linijas-rail-baltica-posma-pernava-igaunijas-latvijas-robeza-sektora-kabli-igaunijas-latvijas-robeza-buvnieciba-pernavas-aprinki-igaunija>

Conservation Agency, RB Rail AS, the Limbaži Municipality. The Service has not received comments from the public.

The Ministry of Defence of the Republic of Latvia, RB Rail AS in cooperation with the Ministry of Transport of the Republic of Latvia and the Nature Conservation Agency provided more detailed comments and opinions regarding the EIA Report. Other authorities informed that they have no comments or additions to the EIA Report.

The Ministry of Defence of the Republic of Latvia noted that the Project implementation measures will not have a direct negative transboundary impact on the defence interests of the Republic of Latvia and do not object to the implementation of the Project.

RB Rail AS in cooperation with the Ministry of Transport of the Republic of Latvia provided opinion that the measures indicated in the EIA report of the Project for mitigating impacts on natural values must be considered and incorporated into the construction designs. RB Rail AS drew attention to the necessity to fully incorporate the considerations and measures for climate change mitigation and adaptation in the EIA report of the Project, in accordance with the conditions of the European Commission's Technical Guidance No C/2021/5430 of 29 July 2021 on the climate proofing of infrastructure for the 2021–2027 period<sup>3</sup>. It can be concluded that currently the EIA report of the Project includes considerations and measures for climate change mitigation but does not fully include considerations related to climate change adaptation. Compliance with these conditions is essential for the implementation of the Rail Baltica project.

The Nature Conservation Agency (hereinafter – the Agency) concluded that in the EIA, including the Natura 2000 impact assessment, two main Rail Baltica route alternatives are evaluated: 1. Alternative (Preliminary Project Solution) and 2. Alternative (Value Engineering Solution). The Agency agrees with the authors of EIA, that within the context of the Natura 2000 impact assessment, no differences have been identified between the two main alternatives that could result in varying impacts on the Nature Reserve “Mērnīeku dumbrāji”. For the main railway line construction, it is projected that the hydrological conditions in the Nature Reserve “Mērnīeku dumbrāji” will be affected over an area of 0,33 ha, impacting the microclimate of habitat type 9010\* *Western taiga*; for the Metsapoole viaduct alternative 1 construction, it is projected that the hydrological conditions in the Nature Reserve “Mērnīeku dumbrāji” will be affected over at least 3,45 ha (5,7% of the total area of “Mērnīeku dumbrāji”, and 6,2% of the total habitat area within it). Metsapoole viaduct alternative 2 construction located more than 1 km from the Natura 2000 site “Mērnīeku dumbrāji” will not affect its hydrological regime.

The Agency stresses that the main threats to the conservation objectives of the Nature Reserve “Mērnīeku dumbrāji” are considered to be the reconstruction of drainage systems and local forest roads. The impact can be avoided by changing the location of the Metsapoole viaduct - no construction of the Metsapoole viaduct or plan the viaduct 1 km further away. Therefore Agency emphasize that the activity is only permissible if this condition is met. Otherwise, compensatory measures for the impact on the Natura 2000 area must be provided before the Project is implemented.

The Service kindly asks to consider the above-mentioned opinions and comments in the EIA report of the Project and inform about the final decision on the proposed activity according to Article 6 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention).

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<sup>3</sup> <https://ec.europa.eu/newsroom/cipr/items/722278/en>

Enclosure: 3 documents (files: *Ministry of Defence\_Rail Baltica.pdf*, *Nature Conservation Agency\_Rail Baltic.pdf*, *RB Rail\_Rail Baltic.pdf*).

Sincerely yours,

Director of Permitting Board

D. Kaleja

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