

Overview of the Environmental Impact Assessment Cross-border procedure and Superficies License for the initial area of Saare-Liivi Offshore Wind Farm

Introduction

Utilitas Wind OÜ is developing the Saare-Liivi offshore wind farm in the Gulf of Riga in Estonian territorial waters which will be connected to the Estonian main grid via submarine cable. The wind farm area is located in a county plan area suitable for wind energy development in the sea area bordering Pärnu County in the Republic of Estonia. More information regarding the project can be found in the Saare-Liivi offshore wind park website: <https://saareliivituulepark.ee/en/>.

The environmental impact assessment (hereinafter referred to as EIA) of the superficies license was initiated by the decision-maker the Consumer Protection and Technical Regulatory Authority on 23rd of December 2021. The EIA covers both the offshore wind farm and the export cable corridor. The Consumer Protection and Technical Regulatory Authority recognised the EIA report as compliant with the requirements on 6th of August 2025. Based on the EIA report, the offshore wind farm can have up to 80 wind turbines with the maximum total height of 310 metres and maximum power of each turbine max 20 MW.

This process concerns only the Initial area of the Saare-Liivi offshore wind farm (see figure 1). The EIA programme for the Additional area of the Saare-Liivi offshore wind farm was declared compliant with the requirements by the Consumer Protection and Technical Regulatory Authority on 20th of October 2023, and a separate EIA report is being prepared for this area, including separate cross-border involvement.

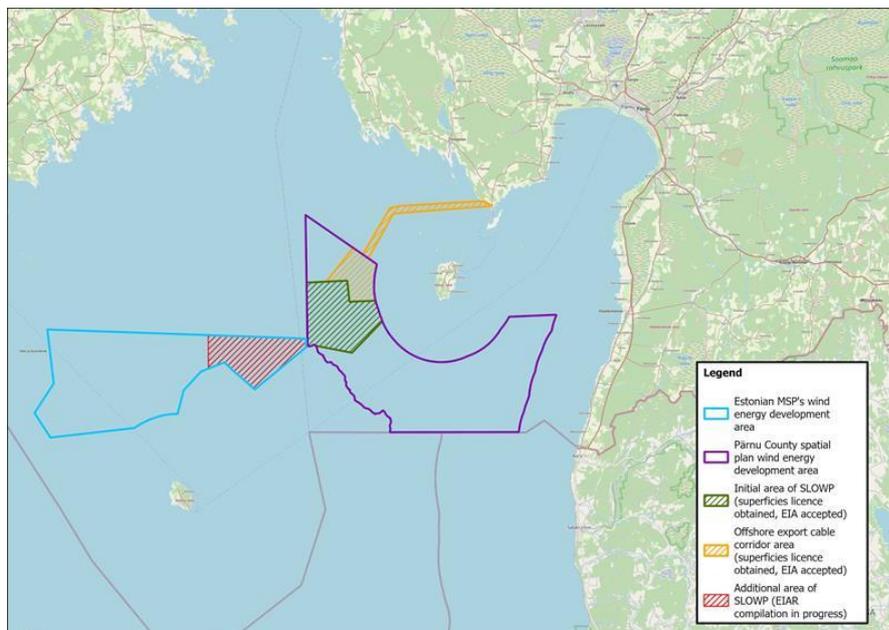


Figure 1. Location of the Saare-Liivi Initial and Additional areas in the Gulf of Riga

The initial cross-border involvement of neighbouring countries took place after the EIA was initiated, during which, Sweden, Latvia and Lithuania requested to be involved in the cross-

border impact assessment process. Finland requested additional information before making a final decision on participation. Latvia and Sweden drew attention to the need to assess the impact on bird and bat migration, marine habitats, fish stocks and species protected under Natura 2000. The need to consider navigation and maritime safety and the cumulative effects was also highlighted.

The second cross-border involvement took place during the public display of EIA programme, giving countries another opportunity to express their opinions and proposals. Finland, Sweden and Latvia reiterated the need to study bird migration, including conducting a radar survey, while Latvia and Sweden once again pointed out the importance of fish stocks, fishing and maritime transport. Finland also requested to be involved in the cross-border impact assessment process. All relevant proposals were included and taken into account in the EIA programme.

The third consultation took place during the public display of EIA report during which the Estonian Ministry of Climate sent the Saare-Liivi offshore wind farm EIA report to Latvia, Lithuania, Finland and Sweden. The countries acknowledged the environmental studies that had been carried out and the mitigation measures that had been implemented.

Overview of cross-border feedback

Finland. The Finnish Environment Institute considers it necessary to fully implement the proposed mitigation measures to reduce the impact on migratory birds, bats and seals and to ensure the protection of herring spawning and migration. The Institute considers that the potential impacts on migratory fish, including salmon and eel, have not been sufficiently assessed, even though they may have cross-border impacts. Therefore, these impacts should be further analysed, particularly during the construction and operation phases, and the results should be taken into account in the permit procedure and decision-making.

It is also emphasised that, when preparing the EIA report for the additional area, the cumulative impacts of other offshore wind farms planned in the area needs to be considered.

Sweden. According to BirdLife Sweden, an important bird migration corridor passes through the area of the proposed Saare-Liivi offshore wind farm, and the area is also very important for resting, moulting and wintering seabirds, especially the common scoters and the velvet scoters. Although changing the location of the wind farm has reduced the potential impacts, significant negative impacts on birdlife may still remain, and therefore mitigation measures are considered necessary.

The Swedish Pelagic Federation emphasises the need to reduce the noise impact during the construction and operation phases, to assess more thoroughly the impact of permanent low-frequency underwater noise and sediment dispersion on fish at all stages of their life cycle, and to ensure protection during spawning periods. A monitoring programme and data sharing with affected countries are also considered necessary.

Latvia. The Latvian authorities did not raise any objections or significant additional comments to the EIA report. The Ministry of Transport drew attention to the need to ensure adequate coverage of the Automatic Identification System (AIS) after the construction of the wind farm and noted that, given the low intensity of maritime traffic in the area, the purpose and possible impact of planning a vessel traffic management system is questionable.

The Nature Conservation Agency noted that previous proposals had been taken into account, recommended periodic monitoring and requested that Latvia should be provided with the information regarding the monitoring results, including possible cross-border impacts.

Lithuania. The Ministry of Environment of the Republic of Lithuania considered that the third alternative could be considered acceptable, provided that all the mitigation measures set out in the EIA report were implemented. It is noted that the EIA report should include an action plan in case monitoring reveals that the impact is significant and the mitigation measures proposed in the report are insufficient. Recommendations were also made regarding bird monitoring, and it was found that the cumulative impacts on bird species, considering other wind farms planned in the Baltic Sea, have not been sufficiently assessed.

Overview of the consideration of cross-border feedback in the EIA report

We would like to clarify the following points raised by the countries regarding birds, fish stocks, mitigation measures, monitoring and cumulative impacts. At least 20 different studies and modelling were carried out during the EIA process. As explained in Chapter 3.1 of the EIA report, the bird studies included radar, visual, acoustic and telemetry surveys. While the spatial alternative assessed in the initial EIA included up to 160 wind turbines, the studies revealed that the southern part of the initially proposed area is unsuitable due to bird migration and feeding areas, and the northern part is also unsuitable due to the resting and feeding areas of Arctic birds. As a result of the EIA, a solution with a reduced spatial extent of 80 wind turbines was developed. The wind turbines should be located in a north-east to south-west direction in accordance with the prevailing migration route, and a minimum distance of 30-40 metres will be left between the water surface and the rotor to reduce collision risks.

Fish studies are described in Chapter 3.4 of the EIA report. The fish survey was carried out using standard 1.8 m high monitoring nets with different mesh sizes, specifically designed for fish surveys in the Baltic Sea region. To assess seasonal changes in the fish community throughout the year, the survey was conducted over two years, including in spring when most fish species spawn and migrate. No salmon or eel migration was detected in the area.

All mitigation measures set out in the EIA report are specified as mandatory and included in the superficies licence. In accordance with point 8 of the superficies license, an environmental management plan for the offshore wind farm must be compiled in cooperation with the experts in the field, applying the best available technological solutions. A mandatory part of

the environmental management plan is a post-assessment plan with a specific monitoring plan. The exact methodologies for ex-post evaluation and monitoring will be determined when the environmental management plan is compiled. Specifying monitoring methodologies in high detail in the superficies license phase when the actual construction could start after several years would limit the possibility to use up-to-date modern research methods.

Cumulative effects may occur if the planned activities result in territorial or temporal overlap of impacts, repeated removal or addition of resources, or repeated changes to the landscape. When assessing cumulative impacts, similar projects or other planned projects that will result in the accumulation of similar impacts from several activities can be taken into account which have reached at least the same stage of assessment at the time of preparation of the EIA report, i.e. it is possible to take into account the research data collected and published for another project.

Chapter 5 of the EIA report states that the only such project at the time of preparing the report was the Liivi Bay offshore wind farm planned in Estonian territorial waters (developed by Liivi Offshore OÜ). The EIA report assessed its cumulative impact and noted that the need to implement mitigation measures should be applied on the same basis for nearby planned offshore wind farms. The EIA process for the Gulf of Riga offshore wind farm has not reached the public display of EIA report yet and its cross-border inclusion will take place as a separate process.

Conclusions

On January 28, 2026, the Consumer Protection and Technical Regulatory Authority issued the superficies licences for Saare-Liivi offshore wind farm initial area and export cable corridor in the Gulf of Riga. The superficies licence allows the developer to proceed to the subsequent stages of the project, including applying for a building permit. The offshore wind farm is expected to be operational and supplying electricity to the grid by 2030 the earliest.