



Valsts vides dienests

State Environmental Service of the Republic of Latvia

Rūpniecības iela 23, Rīga, LV-1045, Latvia, phone +371 67084200, e-mail pasts@vvd.gov.lv, www.vvd.gov.lv

Rīgā

20.03.2026.

Our ref.Nr.2.28/AP/2765/2026

Ref. to 05.02.2026.

No. D8(E)-492

Mr. Vitalijus Auglys

**The Ministry of Environment
of the Republic of Lithuania**

info@am.lt

vitalijus.auglys@am.lt

beata.silobritiene@am.lt

Regarding the transboundary environmental impact assessment of the construction and operation of a wind farm of up to 35 wind turbines in the Nemunėlio radviliškis and parovėja wards of the Biržai district municipality in the Panevėžys county, Lithuania

The State Environmental Service of the Republic of Latvia (hereinafter – the Service) would like to express its gratitude to the Ministry of Environment of the Republic of Lithuania for the information provided regarding the results of the environmental impact assessment (hereinafter – the EIA) Report for the construction and operation of a wind farm of up to 35 wind turbines planned in the Nemunėlio Radviliškis and Parovėja wards of the Biržai district municipality in the Panevėžys county, Lithuania (hereinafter – the Project).

Please be informed that the public information and participation process concerning the EIA Report of the Project in Latvia was carried out from **10 February 2026 to 12 March 2026**. Information regarding the prepared EIA Report and the options for public participation was published in the local newspaper “*Bauskas Dzīve*”, made available on the Service’s website¹, and sent directly to relevant stakeholders in accordance with the national procedure for EIA in a transboundary context. A meeting was held on **25 February 2026**, and the video recording and minutes of the meeting were subsequently published on the Service’s website.

The Service has received responses from the Ministry of Foreign Affairs of the Republic of Latvia, the Ministry of Health of the Republic of Latvia, the Ministry of the Interior of the Republic of Latvia, the Ministry of Smart Administration and Regional Development of the Republic of Latvia, the State Centre for Defense Military Sites and Procurement, the Nature Conservation Agency, Zemgale planning region, Bauska municipality, association “*Tautas labklājībai.lv*” as well as comments from members of the public.

The Ministry of the Interior of the Republic of Latvia notifies that the EIA Report states that hazardous chemical substances will not be used or stored during the planned activity.

¹ <https://www.eva.gov.lv/lv/parrobezu-ietekmes-uz-vidi-novertejumu-projekti/veja-parka-lidz-35-veja-elektrostaciju-buvnieciba-un-ekspluatacija-birzu-rajona-pasvaldibas-panevezys-apaksrajona-nemunelis-radviliskis-un-parovejaciemu-apkartne-lietuva>

However, it should be noted that during the operation of wind turbines certain technical fluids are typically used within the equipment (e.g., gearbox oils, hydraulic fluids, transformer oil, etc.), which according to relevant regulatory classifications may be considered hazardous substances (for example, flammable or environmentally hazardous). Therefore, it is recommended that the report specify the types of substances used, their approximate quantities per turbine and the total amount within the wind farm, as well as the measures envisaged to prevent leaks and the procedures to be followed in the event of an accident.

In addition, it is recommended that the EIA Report be supplemented with information on potential fire risks associated with wind turbines and related infrastructure (e.g., electrical equipment and transformers), as well as the planned fire safety measures and operational response possibilities in case of an emergency. The EIA Report should also describe access arrangements for firefighting and rescue vehicles to each turbine, the parameters of access roads, available water supply or water abstraction points, and general procedures for responding to fire or other emergency situations in order to ensure effective firefighting and rescue operations.

The Ministry of Smart Administration and Regional Development of the Republic of Latvia suggests specifying how the Project will affect the natural monument “Skaistkalnes karsta kritenes”, especially during the construction of the wind park. They also ask to indicate whether a geological survey has been carried out regarding the potential impact of the Project on the surrounding area, including the natural monument “Skaistkalnes karsta kritenes”.

The State Centre for Defense Military Sites and Procurement (hereinafter – the Centre) indicates that taking into account the location of the wind farm in the immediate vicinity of the border of the Republic of Latvia (1.4 km), the Centre points out that, in its opinion, the impact on the territory of Latvia has been assessed incompletely within the framework of the EIA process. They draw attention to the fact that a detailed assessment of the impact of the Project on:

1. Geological objects located in the territory of Latvia (active karst processes occurring near the proposed activity site), since hydrogeological changes in the territory of Lithuania may have impact at a greater distance if the common groundwater system is affected during construction works.
2. The traditional landscape of the region and how the Project will change the identity and visual quality of the site and whether such changes are permissible. Wind turbines of such height (270 m) directly affect the landscape within a radius of 5-10 km, and their total visibility reaches up to 50 km.

The Nature Conservation Agency notes that, to further reduce collision risks for migratory and soaring bird species, it would be advisable to equip wind turbines with SOD (shut-down-on-demand) systems throughout the entire wind farm area. As a minimum, such systems should be installed on wind turbines located within approximately 2 km of the Latvia–Lithuania state border, where there is a higher potential impact on bird species nesting in the Latvian border area.

Zemgale planning region considers that the EIA documentation should be supplemented with clarifications regarding transboundary impacts, particularly with respect to:

- the assessment of the visual impact of aviation safety lighting during nighttime.
- landscape impact visualizations from viewpoints located within the territory of Latvia.
- a joint transboundary assessment of karst processes using a comparable data methodology.
- a more detailed analysis of transboundary social impacts in the populated border areas of Latvia.

The Zemgale Planning Region considers that clarification of the above aspects is essential to ensure a comprehensive assessment of transboundary impacts and balanced decision-making regarding the implementation of the proposed activity.

Bauska Municipality raises concerns that the EIA does not sufficiently address potential

transboundary impacts on the Latvian territory, particularly in the Skaistkalne and Kurmene parishes.

The municipality notes that the EIA Report does not include an expert assessment of possible impacts on the protected geological and geomorphological natural monument “Skaistkalnes karsta kritenes” and does not adequately analyze potential impacts on karst processes in the adjacent Latvian territory. Concerns are expressed that deep turbine foundations and vibrations generated by wind turbines could potentially influence karst processes, groundwater conditions and ground stability in Latvian territory.

The municipality also indicates that the EIA report does not sufficiently assess landscape impacts on the Latvian side of the border. In particular, it highlights the potential visibility of wind turbines from Latvia, including from the culturally significant “Skaistkalnes baznīcas komplekss” (Skaistkalne Church complex), and suggests that additional visual impact assessments and visualizations from viewpoints in Latvia would be necessary.

Further concerns relate to potential shadow flicker effects on nearby residential areas in the Latvian border region, as well as possible negative impacts on property values and the living environment of local communities.

In conclusion, Bauska municipality proposes that an analogous EIA should be carried out for the Latvian territory, considering the Sustainable Development Strategy of the Zemgale Planning Region for 2015–2030², which defines Zemgale as a region with a distinctive cultural landscape where a balance between human activities and the environment should be maintained.

Association “Tautas labklājībai.lv” raises concerns about the proximity of several planned wind turbines to the Latvian border, including their distance to Skaistkalne, nearby residential properties, and “Skaistkalnes karsta kritenes”. According to the submission, the construction of wind turbines in this area could pose risks to the integrity of karst processes, groundwater regimes, and protected natural values.

The authors of the submission also express concerns regarding potential impacts on biodiversity, particularly bird and bat species recorded in the area, including protected species, as well as possible adverse effects on landscape quality, cultural landscape values, and the living environment of residents in the Latvian border area. Additional concerns relate to potential noise, vibration, shadow flicker, and possible impacts on property values.

Furthermore, the submission refers to international and European Union environmental legislation, emphasizing the need for a thorough assessment of potential transboundary impacts and clear allocation of responsibility in case of negative environmental effects.

In addition, a submission was received from a private individual, who emphasizes that the planned wind turbines could have a significant visual impact on the Latvian border landscape. According to the submission, the border area is characterized by an open rural landscape with low building structures and wide horizons, where large vertical structures may become dominant elements visible over long distances. It is noted that such turbines could be visible from several tens of kilometers and may substantially change the visual character of the landscape, introducing large-scale industrial elements into a traditionally rural environment. Concerns are also raised regarding the visual impact of aviation safety lighting during nighttime.

The submission also addresses potential impacts on the living environment and quality of life of residents in the Latvian border area. In particular, the submitter refers to possible effects related to noise, including low-frequency noise and amplitude-modulated noise, as well as shadow flicker caused by rotating turbine blades. The submission suggests that these factors may affect residents’ well-being and that the environmental impact assessment may not sufficiently evaluate

² <https://www.zemgale.lv/lv/media/97/download?attachment>

such impacts in the context of nearby Latvian settlements.

Potential impacts on biodiversity are another concern raised in the submission. The submitter notes that the area is located within an important migration corridor for birds and bats in the Baltic region. According to the submission, wind turbines could create collision risks for migratory birds and bats and may affect their migration routes, feeding areas, and population dynamics. Particular attention is drawn to species protected in Latvia, including large birds of prey and other protected bird species, as well as several bat species.

The submission further raises concerns regarding cumulative impacts. It is noted that several wind energy projects are planned or under development in the Baltic region, and therefore the impacts of the proposed wind farm should not be assessed in isolation. The submitter indicates that the combined visual, ecological, and acoustic impacts of multiple wind parks in the region may be significant and should be evaluated through a comprehensive cumulative impact assessment.

Overall, the submitter considers that the current environmental assessment does not provide sufficient evidence to conclude that the potential impacts on the Latvian territory, biodiversity, landscape, and residents' living environment would be insignificant. This submission therefore calls for a more comprehensive transboundary impact assessment, including additional data, independent expert evaluation, and a more detailed analysis of cumulative and long-term impacts before the project is further advanced.

All other authorities informed the Service that they have reviewed the documentation received and have no comments or additions regarding the transboundary impact assessment. No comments were received regarding the minutes of the meeting.

The Service kindly asks to consider the above-mentioned opinions and comments in the EIA report.

The Service would like to express its willingness to continue the successful bilateral cooperation that has been established in the field of environmental impact assessment in a transboundary context.

Enclosed documents: 11 files (*Ministry of Foreign Affairs_Birzi.pdf, Ministry of Health_Birzi.pdf, Ministry of Interior_Birzi.pdf, Nature Conservation Agency_Birzi.pdf, Private person_Birzi.pdf, Tautas Labklajibai_Birzi.pdf, VAMOIC_Birzi.pdf, VARAM_Birzi.pdf, Zemgale planning region_Birzi.pdf, VAMOIC_protocol_Birzi.pdf, Bauska municipality_Birzi.pdf*)

Sincerely yours,
Director of Permitting Board

D. Kaleja

THIS DOCUMENT IS SIGNED WITH SECURE ELECTRONIC SIGNATURE AND
CONTAINS TIME- STAMP

Evelina Rezija Paegle
evelina.paegle@vvd.gov.lv