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State Environmental Service of the Republic of Latvia

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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 prepared responses to comments and suggestions highlighted in the letter No. 2.28/AP/2765/2026 dated March 20, 2026, of the Service regarding 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 Service forwarded the letter No. D8(E)-2088 of May 28, 2026, from the Ministry of Environment of the Republic of Lithuania to the involved authorities. The authorities provided following comments that are translated in English by the Service:

- **The Ministry of Interior of the Republic of Latvia** having reviewed the responses provided by the Ministry of Environment of the Republic of Lithuania, concluded that they provide the necessary clarifications regarding the comments previously submitted. At the same time, the Ministry of Interior of the Republic of Latvia notes that although the implementation of the Project is not expected to result in significant adverse transboundary impacts, it is essential to ensure the timely exchange of information regarding any potential transboundary impact risks, should such risks be identified. This is necessary to ensure the preparedness of the civil protection system of the Republic of Latvia in the event of a possible emergency.

- **The Municipality of Bauska** (hereinafter – the Municipality) has reviewed the responses provided by the Ministry of Environment of the Republic of Lithuania within the framework of the transboundary consultations of the EIA procedure regarding the Project and submits following opinion:
 1. In the Municipality's opinion, the responses provided to the questions and comments do not contain any additional information beyond that included in the initial version of the EIA. The explanations received do not propose any additional mitigation measures to reduce impacts.
 2. The Municipality has not received any substantial arguments that would dispel the concerns previously raised regarding the potential activation of geological karst processes as a result of the construction and operation of a large number of high-rise wind turbines in the immediate vicinity of the populated areas of Skaistkalne and Kurmene parishes.
 3. The Municipality considers it unjustified to plan the location of wind turbines (N20 and N21) at the edge of the karst zone, i.e. at only 25 to 31 metres. Considering physical phenomena such as cavitation and resonance, it is unacceptable to plan the installation of 35 rotating structures of considerable height in close proximity to active karst processes without additional calculations and precautionary measures.
 4. References to Lithuanian legislation regarding permissible levels of noise, vibration and shadow flicker cannot be regarded as acceptable, since the impacts of the Project extend to the territory of the Republic of Latvia. In the Municipality's opinion, these impacts should therefore be assessed in accordance with Latvian legislation.
 5. Under Latvian legislation, direct compensation payments to residents are provided in order to partially offset the adverse impacts that are undeniably caused by the presence of wind turbines.
 6. The Municipality requests an appropriate solution regarding the Latvian landscape treasures located in the vicinity of the Project – “View of the Skaistkalne Catholic Church and Crypts” and “The Skaistkalne Karst Sinkhole Landscape” (in Latvian *Skaistkalnes karsta kriteņu ainava*). At a minimum, the EIA should include visual simulations from viewpoints located within the territory of Latvia.
- **The Nature Conservation Agency** (hereinafter – the Agency) having reviewed the responses submitted by the Ministry of Environment of the Republic of Lithuania, concludes that a substantial part of its previously submitted proposals has been taken into account. The Agency positively assesses the planned pre-construction and post-construction monitoring of birds and bats and emphasizes that the monitoring results should serve as the basis for adaptive management of the wind farm and, where necessary, the implementation of additional mitigation measures. The Agency also welcomes the additional information provided regarding Latvian Natura 2000 sites and other nature conservation values.

The Agency further emphasizes that its previously submitted proposal regarding a comprehensive assessment of transboundary landscape impacts has not been taken into account. Although the EIA documentation has been supplemented with information on Latvian landscape areas, cultural heritage sites, landscape sensitivity and distances to the planned wind turbines, no visual impact modelling (photomontages or visual simulations) has been carried out from representative viewpoints located within the territory of Latvia, including Skaistkalne, Kurmene and the protected geological monument “Skaistkalnes karsta kriteres”.

In the Agency's opinion, distance analysis alone is not sufficient to assess the visual dominance and potential effects of wind turbines reaching up to 270 m in height on the

Latvian landscape and cultural landscape. The objective of the transboundary EIA procedure is to ensure that potential impacts on the territory of the affected State are assessed with an equivalent level of detail, providing objective and comprehensive information for decision-making.

Therefore, the Agency maintains its objection regarding the assessment of transboundary landscape impacts and considers that the EIA documentation should be supplemented with visual simulations and photomontages prepared from representative viewpoints located within the territory of Latvia, ensuring a comprehensive and objective assessment of the potential visual impact on the Latvian landscape and cultural landscape.

- **The State Defence Military Objects and Procurement Centre** (hereinafter – the Centre) informs that it has reviewed the responses submitted by the Ministry of Environment of the Republic of Lithuania to the comments and proposals provided by the institutions of the Republic of Latvia, including the Centre, within the framework of the transboundary consultation procedure. The Centre concludes that some of its proposals have been accepted, while the proposals that were not accepted have been provided with clear and understandable explanations. The Centre has no additional comments or proposals.
- **The Ministry of Health of the Republic of Latvia** notes that taking into account that, according to the information provided, the Project is not expected to have adverse impacts on human health in Latvia, the Ministry of Health has no additional comments or proposals regarding the responses submitted by the Ministry of Environment of the Republic of Lithuania from the perspective of human health.
- **The Zemgale Planning Region** having reviewed the responses provided, concluded that some of the comments submitted by the Latvian side have been taken into account and additional explanations have been provided regarding certain environmental impact aspects. At the same time, in the opinion of the Zemgale Planning Region, several of the issues previously raised have not been comprehensively assessed, or the responses provided do not contain sufficient justification to dispel the concerns initially identified regarding the potential transboundary impacts on the territory of Latvia.

A detailed assessment of the potential visual impact of aviation obstruction lighting during nighttime on the Latvian border areas has still not been provided. Likewise, no landscape visualisations or spatial simulations from viewpoints located within the territory of Latvia have been submitted, despite the fact that the initial comments highlighted the potential for significant visual impacts, taking into account the planned height of the wind turbines and the topographical characteristics of the Zemgale Plain.

Regarding the assessment of karst processes, the Zemgale Planning Region maintains its previously expressed position that the assessment of transboundary geological processes should be based on a comparable methodology in both countries. The responses provided do not provide sufficient assurance that the potential impacts on transboundary karst processes have been assessed in adequate detail.

Furthermore, the concerns regarding the assessment of transboundary social impacts on the populated areas of the Latvian border region have not been fully addressed.

The Zemgale Planning Region considers that the responses provided by the Lithuanian side are only partially sufficient and do not fully demonstrate that the implementation of the Project will not result in significant adverse transboundary impacts on the territory of Latvia with regard to the above-mentioned aspects.

- **The Ministry of the Smart Administration and Regional Development and the Ministry of Foreign Affairs of the Republic of Latvia** informed that Ministries have no additional comments or proposals.

Considering above mentioned we kindly ask for your additional response in writing regarding the comments provided by the Municipality of Bauska, the Nature Conservation Agency and the Zemgale Planning Region.

The additional responses and clarifications you provide will be important in enabling us to confirm that the implementation of the Project is not expected to result in significant transboundary impacts with respect to any of the environmental impact aspects.

Enclosed documents: 8 files (*Ministry of Foreign Affairs_Birzi.pdf, Ministry of Health_Birzi.pdf, Ministry of Interior_Birzi.pdf, Nature Conservation Agency_Birzi.pdf, VAMOIC_Birzi.pdf, Ministry of Smart Administration and Regional Development_Birzi.pdf, Zemgale planning region_Birzi.pdf, Bauska municipality_Birzi.pdf*)

Sincerely yours,
Director of Permitting Board

D. Kaleja

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