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Sweden's response to consultation of draft plan concerning the decision on selecting potential offshore wind farm sites within the Finnish Exclusive Economic Zone, SYKE/2025/1121

Sweden was preliminary notified by Finland in accordance with Article 10 of the Protocol on Strategic Environmental Assessment (the SEA protocol) to the Convention on Environmental Impact Assessments in a Transboundary Context (Espoo Convention) in May 2025. Sweden acknowledged the notification and the response was that authorities, municipalities in Sweden wanted to take part in the further environmental assessment.

This notification pursuant to Article 10 concerns the consultation of the Strategic Environmental Assessment (SEA) of the decision on potential offshore wind farm sites within the Finnish Exclusive Economic Zone (EEZ).

A brief summary of views and comments on the draft document is provided below. All enclosed statement should be read in their entirety.

Consultation in Sweden

The consultation documents were circulated for review among Swedish central government agencies, relevant county administrative boards and municipalities, organizations and the general public during the period from 27th of October until 9th of December 2025. The documents have also been made available on the Swedish Environmental Protection Agency's (SEPA) website.

The Swedish EPA is the authority responsible for fulfilling Sweden's obligations following from, inter alia, Article 10 in the protocol (SEA) to the Espoo convention. However, SEPA does not evaluate the consultations received with a view to presenting an overall Swedish position. For a comprehensive view of the comments received during the consultations, we refer to the enclosed statements.

Summary of Comments received

Statements have been received from central government authorities, county administrative boards and municipalities. The statements are briefly summarised below by SEPA and have to be read in full text.

National government authorities

The County Board of Administration in Gävleborg refrains from leaving comments.

The Swedish Transport Administration and the Swedish Energy Agency have no comments.

The Swedish Transport Agency and **the Swedish Maritime Administration** raises issues regarding sea transports and off-shore wind farms. Also ice conditions and how to manage future ice conditions in the Bothnian Bay and cumulative impacts from all wind power plants have to be considered. See full statements.

The Geological survey of Sweden (SGU) considers that the potential cross-border effects that turbidity and resuspension of environmental toxins could cause should be included in the environmental impact assessment.

The Swedish Geotechnical Institute (SGI) considers that more detailed studies are needed to clarify the location of the wind farms with the aim of determining the impact on the Swedish economic zone and territorial waters. Water depth, morphology, surface geology and bedrock surface location vary within the designated areas, which may mean that different types of foundations, mooring and anchoring systems may be required, and that the exact location must be chosen in order to guarantee the geotechnical safety of the wind turbines. See full statement.

Swedish Meteorological and Hydrological Institute (SMHI) raise that the report is clearly structured and includes many relevant aspects, however some are missing and SMHI presents a list of aspects and topics that have to be included in the impact assessment. These are for example effects on hydrographic conditions, impacts from artificial lights, consequences on bottom sediments from left cables on the seabed and cumulative impacts. See full statement for more information and details.

The Swedish Environmental Protection Agency leave comments on proposed areas and impact on birds and bats and propose that protection systems for birds and bats should be mandatory in areas where there is a risk to birds and bats. This should apply at least until the risk of unacceptable cross-border impact can be ruled out, for example through various types of monitoring and control programmes. The Swedish Environmental Protection Agency assesses, above all, that the designation of the Bottenviken South energy area could affect shared bird populations, see figure in statement, since the area of "Norra Kvarken" is one of the most important migrating routes for birds. Mitigations measures or further studies are suggested, see full statement for more information.

The Swedish Agency for Marine and Water Management states that in order to avoid risks of negative cross-border impacts, the main issues to be taken into account are impulsive noise and its impact on migrating salmon and the habitat of the harbour seal, as well as hydrographic impacts and cumulative effects.. Hydrographic aspects are missing in the assessment, and the Agency raise the question when this important aspect will be considered. They also states that it is of importance that construction work is adapted to avoid negative impacts on salmon and bay populations. The Agency is positive about future cooperation with Finland regarding cross-border environmental impact and maritime spatial planning. See full statement for more information and further details.

County board of administrations

The County Board of Administration in Norrbotten raise the questions of why the Swedish Marine Spatial Plan is not mentioned in the documents and how cumulative impacts from Swedish and Finnish offshore wind farm are taken into account. The County Board states that the scope of the SEA have to be reviewed and also expresses concern about negative effects on cultural heritage values and natural areas, such as the impact on migratory fish, seals, etc., and that the effects must be taken into account during the construction and operational phases. They also point out the need to assess cumulative effects, such as noise, vibrations, particle dispersion, etc., and to take into account the impact of climate change on species. See the full statement for more information and details.

County board of administrations in Uppsala states that after their reviewing the current documentation, the previously submitted comments are considered to be equally relevant. A few additional comments and clarifications are included in their new statement, but essentially it is the previously submitted comments that need to be addressed by Finland. The County Administrative Board would like Finland to provide feedback on how it intends to address the comments before Finland decides to designate four areas within Finland's economic zone for wind power development. They also would like to have the opportunity to comment on how Finland has addressed the comments submitted. The complementary statement include comments on the missing knowledge, statements regarding the impact on nature values etc. The County Board has provided a complementary statement, the previous statement and two appendices on hydrogen leakages that have to be taken into account.

County board of administrations in Västernorrland, raises issues regarding birds, bats, fishes and marine mammals and missing knowledge. There is also a lack of knowledge about the migration routes of migratory fish at sea. In other words, we cannot say how these wind farms will affect marine fish and their migration. The environmental impact on migratory fish can be transboundary, making them an important issue internationally. A list of what have to be considered regarding migrating fish is presented in the statement. The statement also include comments on cumulative impact and the Swedish Marine Spatial Plan etc. See full statement for more details.

County board of administrations in Västerbotten assesses that the plan may have a significant cross-border environmental impact on migratory birds, bats and fish, which move extensively between Sweden and Finland. Significant cross-border impacts may also arise on shipping in the Baltic Sea. Above all, the County Administrative Board considers that it is the cumulative consequences, together with other planned offshore wind power activities, that may be significant. Efforts are needed to address knowledge gaps and minimise the environmental impact of the projects. Detailed information regarding bats is presented in the full statement.

Municipalities

Skellefteå municipality refers to their statement from the previous notification where they commented on that the environmental impact assessment should clarify whether, and if so how, the planned areas located close to the Swedish EEZ may affect health, marine ecosystems, bird life, and other natural values on the Swedish side. The municipality raise the need for a coordinated Swedish-

Finnish assessment of cumulative effects and better availability of geographical data from both Sweden and Finland in the Swedish system “Vindbrukskollen” and the need for Sweden to take part in further consultations. Further information is given in the full statement.

Non-governmental organizations

BirdLife Sweden highlights the potential high risk for negative impact on nocturnally migrating birds. BirdLife recommends mitigation measures and stresses the importance of including relevant aspects as well as cumulative impacts on migrating birds. They consider that extensive expansion of offshore wind power in the Baltic Sea, according to options 1 and 2 in the present proposal, means that Finland risks violating the Birds Directive in terms of ‘intentionally’ causing large numbers of birds to be killed by wind turbines, as this scenario is a foreseeable consequence of the proposals. See full statement for more information.

VSF, Vi Svenska Fiskare states that consideration of cumulative effects should be included as a criterion in the assessment of offshore wind power areas, and this should be done jointly for Finland's and Sweden's offshore wind power areas. VSF comments on impacts on fish and the fishing industry and the negative consequences from the OWF. They look forward to collaboration between authorities, OWF companies and the fishing industry. They also raise the need for economical compensation. Details and further information are presented in the full statement.

The decision has been made electronically and there is no need for signatures.

For the Swedish Environmental Protection Agency

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Head of Unit

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Point of Contact for the Espoo protocol

Attachment with comments from the:

The Swedish Environmental Protection Agency

The Geological survey of Sweden, SGU

The Swedish Geotechnical Institute, SGI

The Swedish Meteorological and Hydrological Institute (SMHI)

The Swedish Maritime Administration

The Swedish Agency for Marine and Water Management (HaV)

The Swedish Transport Agency

The County Board of Administration in Norrbotten

The County Board of Administration in Västerbotten

The County Board of Administration in Uppsala (statement and three appendices)
Skellefteå municipality
Vi Sveriges Fiskare, VSF
BirdLife Sverige

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Ministry of Climate and Enterprise, Bastian Ljunggren