



SWEDISH
ENVIRONMENTAL
PROTECTION
AGENCY

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Sweden's response to the notification in accordance with Article 3 in the Espoo convention and Article 10 in the protocol for strategic environmental assessment to the Espoo convention regarding the project and master plan for wind power plants in Kontiovaara, Finland, SYKE/2025/186 and SYKE/2025/187

Sweden has been notified by Finland in accordance with the Espoo convention and the associated protocol for strategic environmental assessment regarding the project and component master plan for wind power plants in Kontiovaara in Ylitornio municipality in Finland. Kontiovaara is located approximately five kilometres from the Swedish border.

Sweden acknowledge that the notification has been received and inform that Sweden would like to take part in the further environmental assessments both for the project and the plan. Views and comments on the project, the plan and the assessment are summarised in this document but all statements have to be read in full text.

Consultation in Sweden

The documents for consultation have been circulated for consideration to Swedish central government agencies, the relevant county administrative board in Norrbotten county and the municipalities that borders Ylitornio municipality, organizations and the public during the period from 26th of February 2025 until 5th of May 2025.

A public hearing was held in Sweden in Ylitornio in Finland on 20th of March. It was possible to attend the public hearing on-line. The Swedish EPA (SEPA) had announced the consultation and the public hearing in relevant daily papers. The documents for consultation were also published on the website of SEPA.

The Swedish EPA is the authority responsible for fulfilling the obligations following from inter alia article 3 in the Espoo convention and 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.

Comments received

Statements have been received from the, the Swedish National Heritage Board, the Sami Parliament /Samídiggi, The Swedish Transport Administration, the county administrative board in Norrbotten, the Finnish – Swedish Transboundary River Commission, Övertorneå municipality, the organization BirdLife Sverige and eight letters from the public and tourism industry.

A brief summary of the statements with comments is provided below, please note that the summary is written by the Swedish EPA and not the referred body. All statements are attached and **must be read in full text**.

The Swedish National Heritage Board states that the plan and project have an impact on cultural heritages and sites in Sweden. The board intends to take part in further consultations. Issues raised in the statement are requirement of an analysis of the contextual values of cultural heritage sites and that both visual and contextual impacts have to be analysed and assessed. In addition, they state that there may be an impact on the UNESCO site “Struves meridianbåge” and that an impact assessment of the heritage site (HIA) has to be conducted. Further details and guidance are given in the full statement.

The Swedish Transport Administration states that the plan or project will not have an impact on Swedish infrastructure, rail and roads when the park is in operation. However, transports and use of infrastructure during construction is not presented in the documentation. The Transport administration presents circumstances to be assessed. They would like to be contacted if transports are planned in Sweden.

Sámediggi, the Sami Parlimant, states that Sweden and the “Liehittäjä sameby” may be impacted negatively by the wind power plants. Reindeer are disturbed by various types of infrastructure and human activity at a distance up to 12 kilometres. The Sami Parliament states that there is a need for an environmental impact assessment for reindeer husbandry close to the border and a need for Sweden to participate in the continued environmental assessment process. The Sami Parliament has guidelines on consultation and the preparation of environmental impact assessments in relation to Sami land use and lists what have to be analysed and assessed in the impact assessments and states that consultation should take place with the nearest sami village. They also highlight the importance of both scientific and traditional knowledge. See the full statement for more details.

The County Administrative Board in Norrbotten states that the cumulative impact of the total number of planned and existing wind farms in the area and the consequences have to be described in the environmental impact assessment. Among other things, consequences on cultural heritage sites, the landscape and nature values have to be described. A heritage impact assessment is required because an UNESCO world heritage site, “Struves meridianbåge” is located within the impacted area. Further issues and views are presented in the full statement.

The Finnish – Swedish Transboundary River Commission states that there are many planned wind power projects in the area close to the river valley and that the landscape in Sweden has to be assessed with the same methods as in Finland. Additional photo points for visualisation is required. See the statement for recommended sites. In the assessment of the impact on the landscape in the river valley among other things the different scales, the impact on different types of

landscape, the experience of darkness and silence and the cumulative impact from all projects have to be analysed and assessed. Another issue raised is the water quality and the impact on water and fauna and the risk for acids water from acid sulphate soils in the area. See full statement for a full description.

Övertorneå municipality states that the plan and project will have negatively consequences on Sweden and the environment. There will be cumulative effect of all planned projects. It is of utmost importance that the total, cumulative effects of the many planned wind farms along the Torne River in the Finnish municipalities of Tornio, Ylitornio and Pello, are carefully accounted for in the environmental impact assessment. The municipality maintain their opinion presented at the public hearing, among other things, the negatively impact on living conditions, enterprise and the development strategies implemented in the municipality. The landscape in the river valley will be adversely impacted as well as the tourism industry. It is very important according to Övertorneå that the development of renewable energy sources does not contribute to negative effects on other factors that are important for creating a sustainable future for future generations. Such effects may include irreversible damage to wildlife and the environment, deterioration of living conditions for the municipality's citizens and reduced opportunities for business development. The statement of the municipality is extensive. It includes inter alia the following headlines or key words that have to be considered, cumulative impacts from all parks have to be assessed, warning lights will cause nuisance in a dark area which is very rare, the tourism industry and other business communities will be negatively impacted etc. These key words where only a few of those presented in the statement, which must be considered and read in full text.

Views from the public and companies in the area. Eight letters from eight different persons have been received. Four of the letters have the same content and refers to an enquiry in the area and the result that 85% are negative to wind power plants that have a negative impact on the landscape in the Swedish river valley. In that area the wind power plants will be visible for all the houses and there is a risk for reduced living conditions and property values. There is lacking information regarding Nature 2000-areas in the document. They also raise that cumulative effects of all the planned parks have to be considered and that no parks should be planned within 15 kilometres from the border.

The other public letters state negative impact on the tourism sector since tourists visit the area due to the midnight sun, the northern lights, the silence and the darkness. The park will have negative impact on the Nature 2000 area and the landscape. The document regarding nature values is not sufficient and migrating birds and other birds have to be considered. The business Vitsaniemi Gård oppose to the establishment of wind power plants since it is located too close to the border and will cause adverse negatively consequences on the cultural heritage, nature values etc. Another company states that their living conditions and their guests experience will be diminished.

All the statements have to be read in full texts and considered.

Conclusion and summary

Based on the comments received Sweden intends to participate in the further environmental assessments procedures both for the planning process and the project.

There are many issues raised in the received replies from both authorities, organizations and the public. Cumulative effects from all the wind power plants in the area should be considered as well as all other issues raised in the full statements.

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

For the Swedish Environmental Protection Agency

Nanna Wikholm

Head of Unit

Åsa Blomster

Point of Contact for the Espoo protocol

Attachment with comments from:

The Swedish National Heritage Board

Samidiggi

The Swedish Transport Administration

The county administrative board in Norrbotten

The Finnish – Swedish Transboundary River Commission

Övertorneå municipality

BirdLife Sverige

The public (eight letters)

Copy

Ministry of Climate and Enterprise Eleonora Rönström and Sandra Jalalian

Finnish Environmental Institute, Ulla Helminen and Hanne Rajanen