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Finnish Environment Institute (SYKE)

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Swedish reply to the notification pursuant to Art. 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) regarding the planned wind farm "Teikovaara-Saarivaara" in Pello municipality (SYKE/2024/1521)

The Environment Institute (SYKE) notified the Swedish Environmental Protection Agency (SEPA) on the 13th of February 2025 about the planned development and operation of the wind farm *Teikovaara-Saarivaara*, located in Pello, Finland.

Eolus Energy Oy is planning to build up to 16 wind turbines in the municipality of Pello, approximately 2,1 kilometers north-east of the village of Keminmaa Pello in Finland. The total height of the planned wind turbines will not exceed 270 meters, the unit capacity will be between 6 and 10 MW, the total capacity of the project will not exceed 160 MW, and the wind farm will cover an area of 41.81 square kilometers.

Consultation in Sweden

SEPA is the responsible authority for submitting and receiving notifications and otherwise fulfilling obligations for environmental impact assessments in a transboundary context (Espoo Convention) in Sweden, according to the Environmental Assessment Regulation (SFS 2017:966). The notification and the consultation documents have been circulated for consideration by SEPA to relevant government agencies, including but not limited to the County Administrative Boards, municipalities as well as environmental organizations and effected public.

The consultation period lasted from February 20, 2025, until March 24, 2025.

SEPA received statements from BirdLife Sweden, The Swedish National Heritage Board, Finnish – Swedish Transboundary River Commission, the Swedish Energy Agency, The Sami parliament, County Administrative Board of Norrbotten and the Municipality of Övertorneå. The SEPA also received five statements from members of the public.

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Remarks received during the consultation

A summary of the statements received is included below, please note that the summary is written on behalf of the SEPA and not for the body to which the proposal is referred for consideration.

The Swedish Energy Agency abstains to comment

The County administrative Board of Norrbotten assess that the project may have a significant environmental impact on designated cultural heritage values and the landscape on the Swedish side of the border. They further assess that the project could have a negative impact on migrating birds, bats and reindeer husbandry.

The Sami Parliament states that in order for the Sami Parliament to take a position, the company needs to conduct an Environmental Impact Assessment (EIA)/reindeer husbandry analysis for the reindeer herding of the affected Sámi villages. In their attached statement, they present which aspects in connection to reindeer husbandry analysis that the EIA needs to assess.

The municipality of Övertorneå assesses that the project would have a significant negative impact on residents, businesses, and the municipality's own development strategies. Establishing a wind farm on the Finnish side of the Torne River, in the designated area, would damage both recently completed and future investments in development projects, negatively affect the landscape along the river, hinder the municipality's place marketing strategy, undermine the municipality's political commitments to its citizens to preserve the river valley, contribute to further population decline, and lead to the loss of both existing and future local jobs—particularly in the tourism sector in the northern part of the municipality. Övertorneå Municipality therefore urges that the planned Teikovaara-Saarivara wind farm not be built.

BirdLife Sweden considers it essential that the ongoing process takes significant account of the cumulative effects on bird migration through the region. The wind power industry, including individual developers, must be required to assess the scale of bird migration and implement systems that shut down or slow turbine rotors when conditions indicate a high risk of collisions. Studies must cover both nocturnal and diurnal migratory species. The Environmental Impact Assessment (EIA) should, based on conducted studies—including radar surveys—provide an estimated overview of collision statistics for migrating birds.

The Swedish National Heritage Board does not have any comments on the provided documentation but considers that it is important that Sweden further participate in the EIA process.

Finnish – Swedish Transboundary River Commission considers that, in assessing the project's transboundary impact on the landscape, the distinctive characteristics of the Torne Valley and its various landscape scales—from small-scale, historic village settlements to open, expansive vistas—should be carefully considered. They further assess that it will be highly visible within the river valley's landscape on both sides of the border, situated in a historically significant cultural environment characterized by riverside settlements. The

Environmental Impact Assessment (EIA) should include detailed maps of the border region, highlighting villages and settlements on the Swedish side. The Commission also notes that, compared to other wind power projects currently under review in the Torne Valley, the Teikovaara-Saarivaara wind farm is located in close proximity to the Torne River. Given its sensitive location, the EIA report must be prepared with particular care.

For full details of the received statements and comments received by the public, please see attached.

SEPA hereby acknowledges having received the notification and based on received statements also inform Finland that Sweden intends to participate in the upcoming Espoo process.

This decision has been made digitally and therefore lacks signatures.

For the Swedish Environmental Protection Agency

Nanna Wikholm Head of Unit

> Richard Kristoffersson Point of Contact for the Espoo Convention

Cc

The Ministry of Climate and Enterprise, Sandra Jalalian and Eleonora Rönström

Enclosed, statements made in Swedish by:

BirdLife Sweden The Swedish National Heritage Board Finnish – Swedish Transboundary River Commission Statements from the public (3 pcs.)