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**Sweden's response to the notification in accordance with Article 3 in the Espoo convention and Article 10 of the protocol for strategic environmental assessment to the Espoo convention regarding the wind power farm, Kummunmaa and Repojätkkä windfarms in Ylitornio, Finland
SYKE/2025/185 and SYKE/2025/1739**

Sweden, via the Swedish Environmental Protection Agency (SEPA), was notified by Finland's point of contact, the Finnish Environmental Institute, regarding the wind power project Kummunmaa and Repojätkkä and the local master plan for the wind power farm. The notifications were in accordance with article 3 in the convention and article 10 in the protocol. This letter includes responses on both notifications.

Sweden acknowledge the receipt of the notification and informs that Sweden will participate in the land use planning procedure and the project and their environmental assessment procedures. Summaries of views and comments on the plan and the project are presented below, and original statements are attached to this letter and should be read in full.

Consultation in Sweden

The document for consultation has been circulated for consideration to Swedish central government agencies, the relevant county administrative board in Norrbotten county and the municipalities that borders Tornio municipality, organizations and the public during the period from 17th of September 2025 until 14th of November 2025.

SEPA 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

The Swedish EPA received answers from *Haparanda Municipality, the Swedish Transport Administration, the Swedish National Heritage Board, Swedish Society for Nature Conservation – Norrbotten, the Swedish Energy Agency and the County Administrative Board in Norrbotten.*

The Swedish Transport Administration, the Swedish Energy agency, and the Sami Parliament stated no comments.

Haparanda Municipality express the need to assess the visual impact through comprehensive visualization material, showing the wind farm's effect under various weather conditions as well as at dusk and during nighttime, when the turbines' lighting is active. Regarding the natural environment in the area, they see the need for assessing potential impacts on flora and fauna during the construction of a wind farm in Kummunmaa and Reponjännkä, the investigation needs to be placed in a broader context. This means that the assessment should not only cover the specific project but also include all planned wind farms and other relevant projects in the area. Particular attention should be given to potential cross-border effects, considering impacts on wildlife and vegetation on the Swedish side of the Torne River—both direct and indirect, and from both a short-term and long-term perspective.

The Swedish National Heritage Board states that to assess the cross-border impacts on the cultural heritage environment—particularly the areas of national interests for cultural heritage in Sweden - the environmental impact assessment must clarify whether the planned wind power project could negatively affect these combined values, and if so, in what way. This means that both the visual and contextual impacts need to be described and analysed. The conditions for understanding and interpreting the historical narrative of the cultural heritage environment that may be influenced by the project must be included and methodologically described in the environmental impact assessment. As the measurement points of the Struve Geodetic Arc in Sweden are located within the influence area of the wind farm, The Swedish National Heritage Board considers that the application should be supplemented with documentation in accordance with the “*World Heritage Centre – Guidance and Toolkit for Impact Assessments in a World Heritage Context*” including assessments of how the World Heritage Site Struve Geodetic Arc as a whole may be affected by the planned activity.

The Swedish Society for Nature Conservation – Norrbotten considers that all the planned windfarms in the area should be assessed cumulatively to assess the overall impacts. Furthermore, they state that the construction of the proposed wind farms entails risk of pollution for the waters of the Torne River and the surrounding groundwater, particularly in combination with other wind power projects that are planned, under construction, or already built on the Finnish side. The risk for impacts on aquatic organisms, fish, and drinking water needs to be assessed, prevented, and monitored.

The *County Administrative Board in Norrbotten* states that there is a risk that the planned wind farm could have a significant environmental impact on designated cultural heritage sites and the landscape on the Swedish side of the border. The Struve Geodetic Arc World Heritage Site may be affected, as one of the measuring points with World Heritage status, Perävaara, is located just over 20 kilometres from the planned wind farm. The wind farm may also have a negative impact on the national interest in outdoor recreation in nearby parts of the Swedish Tornedalen valley and natural values such as birds and bats. In addition cumulative impacts from all planned and existing parks should be assessed. Further information, advice on visualization methods etc. and more detailed information is given in the full statement.

For the Swedish Environmental Protection Agency

This decision has been made digitally and therefore lacks signatures

Nanna Wikholm
Head of unit

Richard Kristoffersson
Point of Contact, Espoo Convention

Enclosed statements from:

The County Administrative Board of Norrbotten (Länsstyrelsen Norrbotten, 2 documents)
The Cultural Heritage Board
The Swedish Society for Nature Conservation – Norrbotten
(Naturskyddsföreningen)
Haparanda municipality

Cc.

Klimat- och Näringslivsdepartementet, Bastian Ljunggren