



SWEDISH
ENVIRONMENTAL
PROTECTION
AGENCY

Åsa Blomster
Phone: +46 (0) 10-698 14 51
asa.blomster
@swedishepa.se

2026-08-21

Case number
NV-25-029274

Finnish Environmental Institute
transboundaryEIA.SEA@syke.fi
kirjaamo@syke.fi

Sweden's response to the consultation regarding Åland's proposed master plan and environmental assessment for establishing offshore wind power, "Sunnanvind", north of Åland, Finland, SYKE/2025/951

The Finnish Environmental Institute has invited Sweden to consultation regarding Åland's master plan for offshore wind power, called Sunnanvind, in the sea north of Åland, Finland. The consultation is in accordance with article 10 in the Protocol on Strategic Environmental Assessment. Sweden was notified pursuant to the Protocol in 2025 and requested to take part in further consultations.

The consultation period in Sweden lasted from the 29 May until 14 August 2026. Views and comments are summarised below and all statements with comments are attached and have to be read in its entirety.

Consultation in Sweden

The document for consultation has been circulated for consideration to Swedish central government agencies, the relevant county administrative boards and municipalities, organizations and the public during the period from 29 May until 14 August 2026. The documents have also been published on the SEPA website.

The Swedish EPA is the authority responsible for fulfilling the 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.

Comments received

Statements have been received from central government agencies, three county administrative boards in Uppsala, Stockholm and the Gävleborg counties, Tierps municipality and the organizations Vi Svenska Fiskare and BirdLife Sverige. SEPA has briefly summarised the statements below.

Central government agencies

The Swedish Transport Administration and *the Swedish Energy Agency* have no comments at this stage, and their statements are not attached. The County Board of Administration in Gävleborg refrains from leaving comments.

The Swedish Agency for Marine and Water Management (SWAM) consider in generally the plan “Sunnanvind” to be compatible with the Swedish Maritime Spatial Plan (MSP) and welcomes the proposed planning regulations but leave some comments that should be taken into account, such as for protection of mussel beds. SWAM also emphasize the need to ensure that sufficiently detailed and up-to-date data and surveys are available for the forthcoming permitting process. This is particularly important with regard to birds, marine mammals, fish, sediment dispersion, and cumulative effects. In addition, visualizations of the park seen from the Swedish coast at Östhammar and Öregrund are important since this area has been designated in the MSP as an area where the landscape character and the cultural heritage values have to be considered. The continued assessment should also ensure that any potential transboundary impacts within the Swedish Exclusive Economic Zone are identified and taken into account. See full statement for details and further information.

The Swedish Transport Agency has no comments on the documentation provided. The distance between the wind farm and Sweden’s national shipping fairways of strategic interest is relatively large. The Swedish Transport Agency assesses that any potential establishment of wind power in the area will not affect maritime traffic.

The Swedish Maritime Administration has some complementary comments to their previous statement during the notification. The need of a nautical risk assessment is raised and some references to new knowledge and on-going research are given. See full statement for more details.

The Swedish Meteorological and Hydrological Institute (SMHI) maintains its comments in the previous statement (notification), see further details in the full statement.

The Geological survey of Sweden (SGU) leaves comments to be considered in the permitting process and the further design of the offshore wind farm to consider potential transboundary effects of increased turbidity and sediment dispersion. These risks have to be locally investigated and include the risk for cumulative impacts from other planned and on-going projects in the area. SGU noted that the criteria’s for localising the sampling locations are not clear and give some recommendations, refers to guiding documents and lists relevant aspects to be investigated, see full statement for detailed information.

Swedish Geotechnical Institute (SGI) raise the issue that the project may increase the risk of seabed landslides, potentially causing increased turbidity and the dispersion of potentially contaminated sediments. The location of each wind turbine installation must be adapted to the local seabed conditions. The results of detailed site investigations should be shared with Sweden to enable an assessment of potential transboundary impacts, see full statement for further details.

The Swedish Environmental Protection Agency (SEPA) consider that birds can be negatively impacted by the implementation of the plan and especially eider which is a sensitive species and further details and motives are listed in the statement. SEPA consider that requirements regarding mitigation measures

within this area need to be incorporated into the plan. Alternatively, multi-year studies of migratory birds and bats should be carried out at the proposed site before the area is developed. Depending on the results of these studies, mitigation measures may be required to reduce the risk of transboundary impacts on birds and bats. Such measures could include operational curtailment or an increased buffer distance from migration corridors. See full statement.

County board of administrations

County Administrative Board in Stockholm states that it is not clear how the Swedish Maritime Spatial Plan has been considered and they have no further comments considering the Swedish MSP has been taken into account, see full statement.

County Administrative Board in Uppsala's statement includes comments on impact on the climate, the need for an update of the documentation regarding foundation installation since best available technique is not considered, elimination of the risk of invasive species and the need for a requirement, comments on bats and the need for a monitoring program etc. and comments on migrating birds and the requirement of further investigations of the developer. The attached statement must be read in full text.

Municipalities

Tierps municipality comments on the plan and the planning regulations and proposes changes and considers that the changing fishing conditions should be considered as a transboundary consequence. Tierp municipality also raises the issue of lack of knowledge regarding the planning area, see full statement for more information.

Non-governmental organizations

BirdLife Sweden states that the area of the plan for offshore wind also is an important area for migrating birds. BirdLife considers that off-shore wind farms should not be installed in such areas. In the further process cumulative effects have to be considered, further investigations are required and if the park is given permit monitoring and follow-up programme have to be implemented. BirdLife proposes additional planning regulations that the developer have to conduct further surveys of birds. They also propose revised planning regulations to minimize the impact on birds during a potential operational phase. There is a lot of information in the statement, and it has to be read in full text.

Vi Svenska Fiskare (previous The Swedish Pelagic Federation PO and the Sveriges Fiskares Producentorganisationer (SFPO)) has no comments.

Summary

There are some comments regarding the proposed planning regulations from some stakeholders. In addition there are several comments and recommendations regarding a potential project permitting process and that has to be further investigated and assessed.

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 Geological survey of Sweden (SGU)

The Swedish Geotechnical Institute (SGI)

The Swedish Agency for Marine and Water Management

The Swedish Meteorological and Hydrological Institute (SMHI)

The Swedish Transport Agency / Transportstyrelsen

The Swedish Maritime Administration / Sjöfartsverket

The Swedish Environmental Protection Agency (SEPA)

The county Administrative Board in Uppsala

The county Administrative Board in Stockholm

Tierp municipality

BirdLife Sverige

Vi Svenska Fiskare

Copy

Ministry of Climate and Enterprise Ebba Kvernebo Sunnergren