



SWEDISH
ENVIRONMENTAL
PROTECTION
AGENCY

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Sweden's response to the notification in accordance with Article 10 in the Espoo protocol concerning the Maritime Spatial Plan for Finland, SYKE/2025/1192

The Swedish Environmental Protection Agency (SEPA), Point of Contact for Espoo convention and the protocol, has received the notification 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). The notification concerns the revision of the Finnish Maritime Spatial Plan.

Sweden acknowledge that the notification has been received and inform that Sweden would like to take part in the further environmental assessment. Views and comments on the scoping of the environmental assessment to the MSP are attached and briefly summarised by SEPA below.

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 June 4 until August 25 2025. 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, county administrative boards, municipalities and non-governmental organizations.

Luleå and Sundsvall municipalities and the Swedish University of Agricultural science (SLU) refrains from leaving comments. Kramfors and Skellefteå municipalities have no comments at this stage.

Central government agencies

The Swedish Maritime Administration, the Swedish Geological Survey (SGU), The Swedish Transport Administration, The Swedish Energy Agency and the Swedish Transport Agency have no comments as this stage but will get the possibility to leave comments in the upcoming consultations.

The Swedish Meteorological and Hydrological Institute (SMHI) has reviewed the previous environmental impact assessment and presents a list of what should be included in the coming assessment. Among other things, environmental impacts on hydrographic conditions and other aspects such as lights, noise etc. from establishment and demolitions as well as operation of wind power plants should be included and also impacts from gas generation. Furthermore, impacts from mining and minor boats, noise, light-disturbance, etc. See full statement for a detailed presentation.

The Swedish Agency for Marine and Water Management (SwAM) is the Swedish authority responsible for national Marine Spatial Planning. SwAM is actively engaged in transboundary collaboration with neighboring countries and see the formal Espoo-consultations as important parts of a MSP broader collaboration. SwAM would like to take part in the Espoo consultation for the planning areas: Northern Bothnian Sea, Quark and the Bothnian Bay; and the Archipelago Sea and the Southern Bothnian Sea. SwAM states that transboundary planning issues of special concern from a Swedish perspective include effects on winter navigation for shipping, effects on fisheries, effects on conditions for offshore wind, and tourism. SwAM share planning evidence developed as part of the Swedish MSP process, see full statement for more information.

The Swedish Geotechnical Institute (SGI) raise issues regarding geotechnical safety issues and the spread of contaminants that have to be taken into account in the SEA and the planning process. SGI provide a list of relevant document and data to be used in the planning. SGI also consider that harmonised MSPs could reduce the risks for potential future conflicts with cross-border environmental impacts, see full statement for more information.

County board of administrations

County board of administration in Gävleborg considers that fishing in shallow offshore banks and in their vicinity should be conducted with caution and that herring fishing should be kept to a minimum so as not to adversely affect coastal areas in terms of increased amounts of fine-threaded algae, increased amounts of stickleback and other top-down effects that affect the Baltic Sea due to overfishing. This could have a negative impact on tourism and coastal fishing in Gävleborg County.

County board of administration in Västerbotten states there is a risk for transboundary environmental impact on fauna cultural heritage and maritime transports. The increased pressure on offshore wind power establishments means that the need for bilateral cooperation between countries is greater than before and should be further developed, both in terms of producing joint documentation and investigating and analysing cumulative effects. Relevant transboundary impact to consider and take into account in the SEA and planning are the offshore wind farms impact on maritime transports during wintertime, the impact on a possible mainland connection between Sweden and Finland, impact on migration of birds, bats and fishes and negative impact on cultural heritage

values. See full statement for more details and in addition there are six appendices with more information is also given in six appendices.

County board of administration in Norrbotten entail cross-border environmental consequences in the Gulf of Bothnia as a result of the indirect and cumulative impact of offshore wind power on the marine environment, cultural environments and maritime traffic. The board also raise the need for bilateral cooperation between the countries. They also inform regarding areas of national interest for outdoor sports, cultural heritage etc. that must be considered in the planning. See the full statement for more information and references to reports considered useful in the planning procedure such as off shore windfarms and marine transports and new report regarding ice conditions and sea transports.

County board of administration in Västernorrland, consider that transboundary impact on Sweden can not be excluded. The Swedish MSP should be taken into account in the Finnish planning process. Cumulative impacts from off shore windfarms have to considered as well as environmental risks and the risk for oil leakages into the sea. The county board raise issues regarding nature values, fishes, fish migration, cultural heritage values and states what have to be included in the SEA and provide some data and documents to be used in the planning process. See full statement for details.

Municipalities

Umeå municipality emphasises the importance of national authorities in both Finland and Sweden assessing and evaluating the cumulative effects of infrastructure investments, increased tourism and wind power establishments in Kvarken and in coastal areas on land. The cumulative effects concern, among other things, migratory birds, bats, marine ecological values, shipping and fishing, and tourism. It is not reasonable to leave the assessment of cross-border cumulative effects to the permit process for individual projects. The municipality also comments on the need for sustainable tourism. The provide information regarding the strategies formed by Vasa and Umeå in collaboration and states that the wish for a mainland connection between Wasa and Umeå is taken into account in the planning process. The full statement provides more information.

Piteå municipality states that indirect consequences may arise, for example, through the spread of solid substances as a result of dredging and there could arise consequences for traffic, and possible landscape effects on the nearest islands. Piteå Municipality considers it important that cumulative aspects relating to landscape effects are carefully considered in future work, as are migration corridors for birds and bats, movement corridors for marine mammals and fish, and important spawning grounds for fish. See full statement for additional information.

Non governmental organizations

Finnish – Swedish Transboundary River Commission (FSGK) shows a responsibility for migratory fish stocks and states the need for an adequate assessment of cumulative and combined effects from offshore wind power in a cross-border Baltic Sea perspective. The amount of planned wind energy from the southern Baltic Sea up to the Gulf of Bothnia needs to be taken into account when assessing cumulative effects. See attached statement for more details.

BirdLife Sweden points out the there is a potential high risk for negative impact on birds migrating during nights. Mitigation measures are presented together

with a list of what have to be taken into account in the environmental impact assessment such as the cumulative impacts on migrating birds, the need for knowledge and mitigation measures. See full statement for more information.

The Swedish Pelagic Federation (SPF) Sveriges Fiskares Producentorganisation (SFPO) states that the Finnish MSP may have direct and indirect consequences for Swedish commercial fishing through its impact on access to marine areas, as well as its impact on jointly used fish stocks in the Gulf of Bothnia, the Bothnian Sea and the Baltic Sea through the activities that the plan allows for, such as offshore wind power. In the SEA the organizations would particularly like to see a detailed analysis of the plan's impact on Finnish and Swedish commercial fishing, as well as the impact it may have on fish stocks in the long term. See full statement.

Conclusion and summary

Based on the comments received Sweden intends to participate in the further planning procedure and leave comments on the environmental assessment and the plan since the plan likely have transboundary impact on Sweden. Many authorities provide data and documents useful in the planning and environmental assessment.

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 Meteorological and Hydrological Institute (SMHI)

The Swedish Geotechnical Institute (SGI)

The Swedish Maritime Administration (SWAM, HaV)

Finnish – Swedish Transboundary River Commission (FSGK)

The County Administrative Board in Norrbotten

The County Administrative Board in Gävleborg

The County Administrative Board in Västernorrland

The County Administrative Board in Västerbotten (7 documents attached as an separate email)

Umeå municipality

Piteå municipality

BirdLife Sverige

The Swedish Pelagic Federation (SPF) Sveriges Fiskares Producentorganisation (SFPO)

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Ministry of Climate and Enterprise Eleonora Rönström and Bastian Ljunggren

Finnish Environmental Institute, Ulla Helminen and Hanne Rajanen