



Vides pārraudzības valsts birojs

Environment State Bureau of the Republic of Latvia

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**Regarding notification on Environmental impact assessment
of the offshore wind turbine farm in the Lithuanian marine territory of the Baltic Sea**

Environment State Bureau (hereinafter – the Bureau), acting as a competent authority on environmental impact assessment (hereinafter – EIA) in Latvia would like to thank the Ministry of Environment of the Republic of Lithuania for sending notification about initiation of EIA procedure concerning planned windfarm project in the Lithuanian marine territory of the Baltic Sea.

The Bureau acknowledges receipt of the notification.

Having assessed comments and opinions received from various stakeholders, including the Ministry of Environment and Regional development, the Ministry of Agriculture, the Ministry of Defense, the Ministry of Foreign Affairs, Ministry of Health, Nature Protection Agency, State Environmental Service, Latvian Institute of Aquatic Ecology and other stakeholders and local municipalities, the Bureau herewith informs that the Republic of Latvia intends to participate in EIA process of the offshore windfarm project.

Concerning the scope of assessment – we have summarized information on the aspects for evaluation that were specifically highlighted by various stakeholders, but we kindly ask you to evaluate all aspects of environment according to the Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment:

1. To take into account the Latvian Maritime Plan for Inland Sea Waters, Territorial Sea and Exclusive Economic Zone (hereinafter referred to as the Latvian Maritime Plan) approved by the Cabinet of Ministers of Latvia on 17 May 2019 (the English translation of which is

available on the website of the Ministry of Environmental Protection and Regional Development <https://www.varam.gov.lv/en/maritime-spatial-planning>.

2. To include in EIA materials also the planned wind parks research zones in the territory of Latvia (Wind Park research zone “E1” and “E2”) that is planned in the sea located near the location of the offshore wind park planned by the Republic of Lithuania and is specified in the Latvian Marine Plan (geospatial data in the form of WMS service is available on the website: <https://geolatvija.lv/geo/p/290>).
3. The cumulative impact of offshore the wind parks in the territorial waters of both the Republic of Latvia and the Republic of Lithuania.
4. Navigation safety and possible impacts on the navigation areas and the navigation regime, impact on accessibility of Latvian ports and the reserved navigation areas in the Maritime Spatial Plan of the Republic of Latvia.
5. Possible changes in navigation regime and restrictions on navigation during the operation of facilities and in the event of an accident.
6. Intended security and protection areas, planned/potential facility service sites, fuel and other facility supplies and resource delivery routes.
7. The danger area in the event of accident, possible accident scenarios, their course and planned countermeasures in the case of human search and rescue operations, and the potential consequences.
8. Wind farm/park accident elimination plan, specific countermeasures to reduce accident risks / consequences, provisions of technical resources and personnel.
9. Potential negative impacts and hazards during the construction. For the preparation of the proposed site for construction, access roads are required. Impact of the construction works on the hydrological regime and modern geological processes.
10. Possible impact on the dynamics of sediment flow and the regime of current flow.
11. Possible impacts on the underwater habitats, birds and marine fauna, including fish spawning grounds.
12. Possible impact on the protected territories of European significance (Natura 2000) –the marine territory “*Nida-Pērkone*” and the new a created marine Natura 2000 site (within the LIFE REEF¹ project).
13. To evaluate the visual impact of the project alternatives on the territory of Latvia, Dienvidkurzemes region.
14. Planning monitoring activities.

The Nature Protection Agency Republic of Latvia (hereinafter – the Agency) recommends to follow the information contained in the guidelines provided by European Commission “*Guidance document on wind energy developments and EU nature legislation*”¹, in particular Annex C (Appendix C-Appropriate assessment). It is also recommended to use the *European Marine Observation and Data Network (EMODnet)* - data use and information exchange.

The Agency informs that the planned activity site is located 3.3 km from the biodiversity research area, where the Agency, in cooperation with partners, has started research with the aim to create a new marine Natura 2000 site (within the LIFE REEF project). Information on the habitats and fauna of the area - fish, birds and mammals - is not yet available. In the Marine Plan², based on

¹ https://ec.europa.eu/environment/nature/natura2000/management/docs/wind_farms_en.pdf

² <https://www.varam.gov.lv/en/maritime-spatial-planning>

data from the Institute of Food safety, Animal Health and Environment “BIOR”, informs that the area is a breeding ground for juvenile cod. Therefore, we ask to assess whether the planned wind park could have an impact, for instance, changes in water quality due to suspended sediments, on the feeding conditions to the juvenile cod. Taking into account the planned wind park in the territory of the Republic of Lithuania and the wind energy research zone in the waters of the exclusive economic zone of the Republic of Latvia, it must be assessed, whether sufficiently large, safe corridors for birds and mammals will remain. Impact of construction noise on fish (In the guidance “*Guidance document on wind energy developments and EU nature legislation*” refers to studies that herring can detect the noise up to 80 km from the noise source and it can interfere them). The Latvian Institute of Aquatic Ecology in the new marine NATURA 2000 territory in the summer of 2021 shows that reefs are present in the territory (biotope of EU importance – 1170 *Reefs*). It is necessary to assess whether changes in the flow of waves, currents or sediments could have an impact on the habitat 1170 *Reefs*.

Although the information provided estimates that the impact is unlikely to occur, we would like to draw your attention to the fact that the extraction of hydrocarbons and other minerals (sand) together with the establishment of the planned wind park, however, could make an impact. The most important oil reserves and one sand deposit in the territory of Lithuania are located on the border in the territory of both Latvia and Lithuania.

The Agency asks to precise whether the habitat research and the research of birds, bats and marine mammals for a period of two years will be limited to a restricted site or also the area will be potentially affected. The Agency also asks to take into account, that long-term bat migration studies are being carried out at the Papes Ornithological Research Center near the proposed site. The Agency proposes to consider the possibility of coordinating the researches of bats and migratory birds which are planned in Lithuania and taking place in Latvia, and to implement the information exchange.

If necessary, the Bureau recommends contacting the Agency (E-mail: pasts@daba.gov.lv) for more detailed information.

The Ministry of Health recommends using the guidelines prepared by the Baltic Environmental Forum “*Guidelines for the investigation of the impacts of offshore wind farms on the marine environment in the Baltic States*”³.

The Ministry of Defense asks to evaluate that, due to changes in the navigation regime as a result of the construction of wind power stations, the EIA needs to include the increase in the risk of ship accidents (collisions) in the assessed wind park area and possible consequences, especially for Latvia's natural resources, that may occur as a result of tanker collisions with VES, including marine pollution, taking into account the fact that the wind park is planned to be near the approach sites to the Butinge Oil Terminal.

In addition, we shortly give you an overview of the national requirements for EIA procedures in the Republic of Latvia. We would like to draw your attention that Latvian legislation, in particular the Law on Environmental impact assessment, designates at least 30 days long term for the process of public consultation when elaborated EIA report is discussed. The time is being counted from the day a publication is published in a corresponding newspaper (national, regional, local) which will be ensured by the Republic of Latvia after receiving information from the Republic of Lithuania. A public hearing meeting of the intended activity shall be held. According to the national legislation, a public hearing meeting shall be held no sooner than 7 days after publication is published and no later than 10 days before the ending of public consultation process.

In this context we inform, that according to the national law concerning measures for limitation of the spread of infection disease Covid-19 (and limitations for transboundary travelling), the public

³ <http://bef.ee/wp-content/uploads/2014/04/EIA-Guidelines-2009.pdf>

hearing meeting can be replaced with a video conference and video-presentations.

We kindly ask you to prepare EIA summary that reflects information to the extent and scope necessary for the transboundary EIA (including graphical materials and maps in relation to the transboundary impact aspects) in Latvian.

We are looking forward to our successful bilateral cooperation.

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