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Swedish Environmental Protection Agency  
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Hänvisning

Asia Consultation in accordance with Articles 4 and 5 of the Convention on Environmental Impact  
Ärende Assessment in a Transboundary Context (Espoo Convention) for the Södra Midsjöbanken wind farm  
in the Baltic Sea within the Swedish Economic Zone

By a letter dated 14 October 2015 Sweden supplied Finland the EIA documentation according to the Espoo Convention for the Södra Midsjöbanken wind farm project in the Baltic Sea within the Swedish Economic Zone.

Finland has distributed the consultation material to several authorities and organizations. The material was also made available on the Internet. The public has had the opportunity to comment on the material.

Statements were received from:

- Ministry of Agriculture and Forestry
- Finnish Transport Agency
- Geological Survey of Finland
- Metsähallitus (the state enterprise administering state-owned land and waters)
- Finnish Association for Nature Conservation
- Finnish Environment Institute SYKE
- BirdLife Finland
- Finnish Fishermen's Association (Suomen ammattikalastajaliitto SAKL ry)
- Government of Åland (Ålands Landskapsregering)

**Geological Survey of Finland** and **The Finnish Transport Agency** don't have anything to comment.

**Ministry of Agriculture and Forestry** and **The Finnish Fishermen's Association** are concerned about possibilities of Finnish fishermen to continue commercial fishing on Södra Midsjöbanken. According to EU's Common Fisheries Policy (Regulation no 1380/2013 of the European Parliament and of the Council) Finnish fishing vessels have right to commercial fishing on Södra Midsjöbanken. If the planned project causes any restrictions to the fishing in the area, this needs to be compensated as described in EIA documents ("Störningar som leder till påvisbara förluster för yrkesfisket kommer att kompenseras").

**Government of Åland**, **Finnish Association for Nature Conservation**, **Metsähallitus** (the state enterprise administering state-owned land and waters), **BirdLife Finland** and **Finnish Environment Institute SYKE** pays special attention to the impacts on migrating birds and harbour porpoise.

Based on the statements received, and on its own views, the **Ministry of the Environment** states that the transboundary environmental impacts of the project show to be significant. Shallow marine areas in general and Södra Midsjöbanken above all are extremely important for biodiversity and especially for endangered species in the Baltic Sea. The need for taking fully into account the cumulative impacts of all the planned windfarms of the Södra Midsjöbanken in the decision making must also be stressed.

### ***Birds***

Södra Midsjöbanken is one of the most important areas for waterfowl during wintering and migration. It hosts bird species which also are named endangered in the Helcom red list (2013) and according to IUCN for example the long-tailed duck. In one aerial survey more than 220 000 long-tailed ducks have been counted on Södra Midsjöbanken. According to newest estimate 6% of all wintering long-tailed ducks of the Baltic Sea are on Södra Midsjöbanken.

The Finnish breeding population of long-tailed duck is about 1500-2000 pairs and it breeds in the Northern Lapland. It is likely that the population winters in the Baltic Sea and a substantial part of it could thus be affected by the wind farm. A high number of additional species nesting in Finland is likely to migrate through the area as well. Of the potentially affected species, long-tailed duck is classified globally as vulnerable.

According to the monitoring results from the Danish offshore wind farms (Nysted, Horns rev) the amount of long-tailed ducks declined 90 % due to construction of a wind farm. On the basis of this information the amount of long-tailed ducks on Södra Midsjöbanken would decline to the level of 24 000 specimen.

Parties to the Agreement on the Conservation of African-Eurasian Migratory Water Birds (AEWA) in its 6<sup>th</sup> session has approved the International Single Species Action Plan for the conservation of the long-tailed duck. The long-term goal is to restore the populations of the long-tailed duck to a favourable conservation status within the agreement area and to remove the species from the threatened categories of the IUCN Red List. The purpose of this plan is to significantly reduce direct anthropogenic mortality and understand the drivers of decline by 2025. One result of the actions is a network of protected areas, covering all important sites throughout the lifecycle of the long-tailed duck, for example the wintering areas in the Baltic Sea.

### ***Harbour porpoise***

The harbour porpoise is the only cetacean species that live in the Baltic Sea and the Baltic Sea harbour porpoise population has in the IUCN endangerment evaluation been assessed as critically endangered (CR). Under the auspices of ASCOBANS agreement (Agreement on the Conservation of Small Cetaceans in the Baltic, North East Atlantic, Irish and North Seas) a recovery plan for the Baltic Sea harbour porpoise was created in 2002, so called Jastarnia plan, which is intended to be updated in 2016.

The population of the Baltic Sea collapsed in the 1940s and then the collapse of the population has not recovered to pre-collapse levels. The species is listed in Annex IV in the EU Habitats Directive, requiring a strict protection regime. Assessment under the 2013 Habitats Directive Article 17 on the porpoise favourable conservation status was evaluated as unfavourable -bad.

According to the earlier documents not enough evidence existed on construction activities' impact on harbour porpoise's reproduction. However the SAMBAH project outcome now shows that the area in concern would be the first identified breeding area found for the Baltic Sea harbour porpoise population in the whole Baltic Sea and therefore can be regarded as extremely important. Most likely the harbour porpoises found in the Finnish sea areas are part of this extremely endangered Baltic Sea harbour porpoise population. This is why Finland considers it important that the reproduction period will be taken into account and there is a guarantee for harbour porpoises to nurse their calves without unreasonable interference.

Finland calls for Sweden for its part to promote the AEWA Single Species Action Plan for the long-tailed duck and ASCOBANS agreement's recovery plan for the Baltic Sea harbour porpoise.

Finland wishes to reserve the right to participate in the decision making procedure of the project according to the Nordic Environmental Protection Convention.

All statements received by Ministry of the Environment are attached to this statement. Ålands landskapsregering and Metsähallitus (the state enterprise administering state-owned land and waters) have given their statements in Swedish and BirdLife Finland in English.

Permanent Secretary

  
Hannele Pokka

Ministerial Adviser

  
Seija Rantakallio

#### **For information**

Ministry for Foreign Affairs of Finland  
Ministry of Agriculture and Forestry  
Government of Åland  
Finnish Transport Agency  
Geological Survey of Finland  
Finnish Environment Institute  
Metsähallitus  
Finnish Fishermen's Association (Suomen Ammattikalastajaliitto SAKL ry)  
Finnish Association for Nature Conservation  
BirdLife Finland

