



Vides pārraudzības valsts birojs

*Environment State Bureau of the Republic of Latvia*

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Ministry of Environment of the Republic of Estonia

[keskkonnaministeerium@envir.ee](mailto:keskkonnaministeerium@envir.ee)

**Regarding Environmental impact assessment programme  
of the offshore windfarm project in the west coast of Saare county  
initiated by Saare Wind Energy OÜ**

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 Estonia for sending information about the elaborated draft EIA programme (hereinafter – the Programme) for planned offshore windfarm project in the gulf of Riga that is initiated by Saare Wind Energy OÜ (hereinafter – the Project).

Having assessed The Programme, The Bureau considers that the Programme foresees a broad and detailed investigation, addressing main aspects of concern that were previously highlighted by the stakeholders of Latvia.

We have received comments and opinions from various stakeholders, including from the Ministry of Environmental Protection and Regional development, the Ministry of Agriculture, the Ministry of Transport, the Ministry of Defence, the Ministry of Health, the Ministry of Foreign Affairs, the Ministry Economics, the State Environmental Service, the Maritime Administration of Latvia and local municipalities. Most of the stakeholders are of an opinion that the Programme covers most of the aspects of concern and look forward to the results of the study. We herewith forward summarized comments that were received.

Ministry of Defence concludes that most of their considerations on maritime safety and emergency response have been incorporated into the Programme and expects they will be taken into account in the further assessment and development of the Project. The prepared Programme stipulates that the impact of wind farm operation will be assessed in relation to Estonia's security infrastructure. However, considering the planned height of wind turbines (310 m) and their proximity to the territory of Latvia, it is asked to carefully assess whether they will not affect operation of the air or sea surveillance systems of the National Armed Forces of Latvia. The Ministry of Defence asks that the following sections are included in the assessment: the planned impact of wind turbines on airspace control systems (radars, navigation and communication systems); the planned impact of wind turbines on marine observation and communication systems (radars, navigation and communication systems); estimation of the radiated intensity of the electromagnetic field caused

by wind turbines and impact on Northwest coast of Latvia – Ventspils – Kolka).

The Freeport of Riga Authority has drawn attention to the fact that – to ensure the successful and continuous operation of the Freeport of Riga (and in essence all coastal ports of the Gulf of Riga) – The Project must not cause any negative impact or restrictions on the fairway of Irbe Strait, because large vessels can only reach the port of Riga using the Irbe Strait. The Freeport of Riga Authority asks to take into consideration this aspect throughout the EIA process.

Comment from the Ministry of Environment and regional development is as follows. The Ministry of Environment and regional development has previously asked to analyse data of Automatic Identification Systems (hereinafter – AIS) as a part of EIA to avoid disruption to existing shipping traffic. The Programme states: “The EIA assesses the impact on shipping, incl. impact on traffic related to Latvian ports”, however, the adjusted offshore wind farm construction (licensing) area still overlaps with relatively intensively used shipping traffic areas, potentially creating the need to bypass the wind farm and extend the shipping route for approximately 350-1000 ships per year (according to AIS data of 2016). Both alternatives of the offshore wind farm license areas are crossed by shipping routes from Riga through the Irbe Strait to the Gulf of Bothnia, to a lesser extent to the Gulf of Finland. The most intensive shipping traffic is in the western part of both alternatives (please, see maps prepared by the Ministry of Environment and regional development attached to this letter). To reduce the adverse impact of the Project on navigation, please evaluate the location of offshore wind farm turbines in areas with a navigation intensity of less than 100 vessels per year and consult with the Estonian and Latvian authorities responsible for navigation in developing spatial solutions.

The Ministry of Economics informs that from the point of view of the energy supply system, the impact of the Project on the electricity transmission system is significant, which is an issue to be resolved between the transmission system operators of both countries.

In addition, we ask to evaluate the visual impact of the Project not only on the Estonian coast, but also in the territory of Latvia (from the coastal zone that is a popular tourist site in Latvia).

Attachment – maps prepared by the Ministry of Environment and regional development – 2 pages)

Sincerely yours,



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