



Vides pārraudzības valsts birojs

Environment State Bureau of the Republic of Latvia

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Regarding the notification of the proposed changes to previously planned wind farms

Environment State Bureau (hereinafter – the Bureau), acting as the competent authority on environmental impact assessment (hereinafter – EIA) in Latvia, confirms receipt of the notification that was sent about the proposed changes to previously planned wind farms near the border of the Republic of Latvia (hereinafter – the Project). The Project is planned in Mažeikiai district, Židikai Ward.

As already expressed in previous letters of the Bureau (March 5, 2019, No 5-01/180; April 8, 2019, No 5-01/294) Latvia remains concerned about the significant adverse impact of the Project, including of a transboundary nature. Therefore, Latvia asks Lithuania to apply EIA to the Project and expresses intent to participate in the transboundary EIA process.

Latvia has already previously expressed concerns that information about the planned wind farms (and their extensions) is provided in a fragmented manner. It does not allow for a timely evaluation of the overall scale of the Project, albeit an assessment of mutual and cumulative impacts is an essential prerequisite for an objective environmental decision-making. Wind parks are planned alongside the border of the Republic of Latvia in a way that the closest installations will be only 200 – 300 m away from the territory of Latvia, but the Project intends to further extend the proposed activity. It is planned to increase the number of wind turbines in the immediate vicinity of the border of the Republic of Latvia and to increase the heights of installations up to 240 m.

We would like to point out, that major installations of the harnessing of wind power for energy production is an activity that is likely to cause significant adverse impact. Wind parks have negative impacts on birds, bats and landscape. In addition, there are such negative impacts as the flickering effect, noise, including low frequency noise, impacts on aviation, radar and navigation equipment signals, and all those impacts are cumulative. That is why wind parks are included in Appendix I of the UN Convention *on Environmental Impact Assessment in a Transboundary Context* (Espoo Convention) and Annex II of the Directive 2011/92/EU of the European Parliament and of the Council *on the assessment of the effects of certain public and private projects on the environment*. Setting thresholds for the significance of impacts is regulated by national legislation of the Republic of Latvia (Annex I, point 26.¹ of the law “*On Environmental Impact Assessment*”). According to the law, EIA shall always be applied to wind parks if their capacity exceeds 15 MW. The capacity of wind parks of the Project exceeds 65 MW and 40 MW. Since those wind parks are planned at the border of the Republic of Latvia, we believe it is absolutely necessary to provide an opportunity for the Latvian public to participate in an open and transparent EIA and decision-making process. During the consultation phase of the Project we received comments and opinions regarding the possible impacts on the environment from both the Environmental Service and Nature Conservation Agency of Latvia, concerns were also previously expressed by Saldus County (the bordering municipality). All the involved parties agree that EIA for the Project is essential. Most concerns were expressed regarding the cumulative effects of wind parks, in particular – negative impacts on birds, bats and the landscape, the flickering effect, noise and low frequency noise, as well as impact on aviation.

We also draw your attention that some of the impacts might be underevaluated, mistreated or not taken seriously by the Project proponent. This refers particularly to possible impacts on birds and bats, as well as impact on the landscape. The documentation provided for evaluation contains a statement that structures of wind turbines will be designed imitating the shapes existing in nature and painted in bright colours in order to reduce the effect on the landscape. The appearance of wind power plants and their technical execution to function according to their intended purpose is well known, and it is obviously not possible to alter their design for the purposes to imitate shapes existing in nature. Furthermore, painting wind turbines in bright colours is a rather uncommon practice, in particular – for reducing their visibility. Such intention is also in contradiction with conclusions that are drawn regarding impacts on birds and bats. It is stated that the organizer of the planned economic operations considers the possibility to construct white wind power plants as a preventive measure aimed at the prevention of deaths of birds, because white colour is rarely encountered in nature and thus is well visible to birds during the dark period of the day. It also states that blue lights will be installed on the wind turbines, which shall illuminate an object/obstacle located in the migration path of birds. Concerning such statements, we kindly draw your attention to the following:

1. Wind turbines are mostly coloured in white or light grey colours, yet bird mortality in wind parks is a common and known negative factor around the globe. The type and scale of impact is very much dependant on the species involved, their ecology and state of conservation as well as the location, size and design of the wind farm project. Birds may collide with various parts of the wind turbine and peaks in mortality may be seasonal, for instance during spring and autumn migration when bird concentrations tend to grow significantly. That is why a thorough assessment, including migration assessment, is necessary. Negative impact cannot be eliminated by commitment to conduct such assessment in the future or by commitment to make wind power plants more visible.
2. The concerns over the potential impacts of wind farms on bat species have increased in recent years, particularly in relation to the risk of collision with rotors or turbine towers, as well as barotrauma caused by rapid air-pressure reduction near moving turbine-blades. The highest collision rates have been found in wind farms near forests and it is strictly not recommended to illuminate wind turbines. Illuminated wind turbines attract insects and – as a consequence

– increase collision risks for bats. Bats are also attracted to wind turbines because of echolocation, so – if a site is chosen poorly, impact on bats is significant. That is why a thorough assessment, including migration assessment, is necessary. Negative impact cannot be eliminated by commitment to conduct such assessment in the future.

3. The Birds and Habitats Directives of the European Union¹ (hereinafter – EU) are the cornerstones of EU's biodiversity policy. They enable all EU Member States to work together, within a common legislative framework, to conserve Europe's most valuable species and habitats across their entire natural range within the EU, irrespective of political or administrative boundaries.

Taking this into account, Latvia strongly believes that the proposed activity will cause significant impact on the environment and would like to reiterate our request to participate in the transboundary EIA.

We are looking forward to our successful bilateral cooperation in the field of environmental assessment in the transboundary context.

Sincerely yours,

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Acting Director of Environment State Bureau of the Republic of Latvia



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¹ Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds and Directive 92/43/EEC of the Council of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.

