



SWEDISH
ENVIRONMENTAL
PROTECTION
AGENCY

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Sweden's response to the notification of a preliminary draft plan or programme concerning the decision on selecting potential offshore wind farm sites within the Finnish Exclusive Economic Zone, SYKE/2025/1121

Sweden has been notified by Finland 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 Strategic Environmental Assessment (SEA) of the decision on potential offshore wind farm sites within the Finnish Exclusive Economic Zone (EEZ).

Sweden acknowledges receipt of the notification and hereby confirm that Sweden intends to participate in the continued environmental assessment processes. A brief summary of views and comments on the draft document is provided below. All enclosed statement should be read in their entirety.

Consultation in Sweden

The consultation documents were circulated for review among Swedish central government agencies, relevant county administrative boards and municipalities, organizations and the general public during the period from 27 May until 10 July 2025. The documents have also been made available on the Swedish Environmental Protection Agency's (SEPA) website. Statements have been received from national and regional authorities and Swedish coastal municipalities.

The Swedish EPA is the authority responsible for fulfilling Sweden's 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.

Summary of Comments received

Statements have been received from central government authorities, county administrative boards and municipalities. They are briefly summarised below by SEPA and should be read in full text.

National government authorities

The Swedish Energy Agency and the *Swedish Transport Administration* have no comments at this stage but will remain informed and take part in additional consultations (statements are not attached).

The Geological survey of Sweden (SGU) states that, as only an overview of the plan has been presented, Sweden should continue to participate in the environmental assessment and upcoming consultations in order to evaluate the potential impact of the proposed activities on Sweden's marine environment. The SGU recommends improving the presented maps and commenting on the proposed scenarios. See the full statement for more information

The Swedish Geotechnical Institute (SGI) opinion concerns geotechnical safety issues and contaminated sediments. SGI highlights the importance of addressing these issues in the planning and environmental assessment process.

The Swedish Maritime Administration states that off shore windfarms are likely to have transboundary impacts on Sweden's environment and interests, particularly maritime transports, especially during winter time, and ice breaking operations, which should be taken into account. Cumulative effects and risks analysis have to be considered etc. See full statement for further details.

Swedish Meteorological and Hydrological Institute (SMHI) states that cumulative effects of the planned offshore windfarms must be considered and taken into account. Several parks may have a negative impact on ocean mixing and stratification which can cause other effects. SMHI is positive that the environmental assessment will include many relevant aspects but recommends that among other things impacts on remixing and stratification and impacts on phytoplankton from light pollution are included. Impacts from cables and how cables will be managed and removed should also be taken into account, see full statement for more information.

County board of administrations

County board of administration in Gävleborg assesses that the plan may have a cross-border impact and emphasizes the need for these to be clearly described in future work.

County board of administration in Västerbotten states that the plan may have a negative transboundary impact on migrating species of birds and bats as well as maritime transports in Sweden. The cumulative impacts have to be considered. Further information on scoping and existing knowledge regarding bats are provided in the full statement.

County board of administration in Uppsala's statement is attached in full and not summarised here.

Municipalities

A number of municipalities have responded that they refrain from commenting.

Kramfors municipality point out that the park located in the western part of the Bothnian Bay will be located in the close proximity to the wind farm "Sigma" within Sweden's EEZ. Potential cumulative impacts and impacts on landscape have to be taken into account.

Skellefteå municipality comments that the environmental impact assessment should clarify whether, and if so how, the planned areas located close to the Swedish EEZ may affect health, marine ecosystems, bird life, and other natural

values on the Swedish side. The municipality raise the need for a coordinated Swedish-Finnish assessment of cumulative effects and better availability of geographical data from both Sweden and Finland in the Swedish system “Vindbrukskollen” and the need for Sweden to take part in further consultations. Further information is given in the full statement.

Non governmental organizations

BirdLife Sweden highlights the potential high risk for negative impact on nocturnally migrating birds. BirdLife recommends mitigation measures and stresses the importance of including relevant aspects as well as cumulative impacts on migrating birds. See full statement for more information.

SFPO, states that potential impact on migrating salmon and herring have to be investigated and cumulative effects on fish migration, areas for spawning etc. have to be assessed and taken into account, see full statement for further information.

Conclusion and summary

Sweden acknowledges the notification and hereby informs that Sweden will participate in upcoming consultation regarding the draft plan and the environmental assessment. Key issues raised by various stakeholders include the need to assess cumulative impacts on the marine environment, ocean conditions, migrating birds and bats and landscape values.

The decision has been made electronically and there is no need for signatures.

For the Swedish Environmental Protection Agency

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Point of Contact for the Espoo protocol

Attachment with comments from the:

Geological survey of Sweden

Swedish Geotechnical Institute

Swedish Meteorological and Hydrological Institute

Swedish Maritime Administration

BirdLife Sverige

SFPO

County Board of Administration in Gävleborg

County Board of Administration in Västerbotten

County Board of Administration in Uppsala

Kramfors municipality

Skellefteå municipality

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Ministry of Climate and Enterprise Eleonora Rönström and Bastian Ljunggren