



Vides pārraudzības valsts birojs

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In reference to Estonian Maritime Spatial Plan

Environment State Bureau (hereinafter referred to as the Bureau), acting as a competent authority on the strategic environmental impact assessment (hereinafter referred to as SEA) in the Republic of Latvia, would like to thank the ministry of Environment of the Republic of Estonia for information and documents sent concerning the Estonian Maritime Spatial Plan (hereinafter referred to as the Estonian MSP) and its SEA.

We have gathered opinions from the Ministry of Environmental Protection and Regional Development, the Ministry of Transport and Latvian Maritime Administration, the Ministry of Agriculture, the Ministry of Foreign Affairs, the Ministry of Economics, State Environmental Service, Nature Protection Agency of the Republic of Latvia as well as Freeport of Riga Administration.

The Ministry of Environmental Protection and Regional Development points out that Latvia was involved in cross-border consultations throughout the development of the Estonian MSP, information was translated into English and Latvian and cross-border consultation meetings were organized, which facilitated Estonian – Latvian cooperation in maritime planning. At the same time, in order to reduce the potential risks of transboundary impacts, The Ministry of Environmental Protection and Regional Development kindly asks for a few amendments in the Estonian MSP text:

1. Please, make it clear in section 5.3.1 of the Estonian MSP (*Fish farming*) that fish farming in the Gulf of Riga is not allowed or mark the Gulf of Riga in section 5.3.1 “*exclusion zone*” as a zone where the development of fish aquaculture is not allowed. Following the precautionary principle and taking into account the current increased level of eutrophication, the development of fish aquaculture poses a risk to increase nutrient discharges into the marine environment with already historically high concentrations of nutrients (N and P) (thus increasing the risk of eutrophication and deteriorating the chances of achieving good marine status in Latvian marine waters).
2. Please, include a clause or an explanation in Section 4.4 (*MSPs for the marine areas bordering with Hiiu and Pärnu counties*) that the water traffic areas included in the *Pärnu County Maritime Spatial Plan* (hereinafter referred to as the Pärnu MSP) are indicative and cannot affect the use of the sea outside Pärnu MSP. As already stated in Section 4.4. of the Estonian

MSP – the spatial information of water traffic areas in the Estonian MSP does not coincide with information included in the Pärnu MSP. The Estonian MSP does not intend to change the use of the sea specified in the Pärnu MSP, nevertheless one of the water traffic areas of the Pärnu MSP at the Latvian border ends at the Latvian Wind Farm Research Area “E5” included in the Latvian Maritime Spatial Plan (hereinafter referred to as the Latvian MSP). This should not affect the possibilities of evaluating and developing offshore wind energy projects according to Latvian MSP.

Nature Protection Agency appreciates the research carried out on bat migration, as well as analysis of migratory resting places and assessment of seal distribution. Nature Protection Agency remains precautionous concerning Latvian Specially Protected Marine Areas “*Irbes Šaurums*” and “*Ainaži - Salacgrīva*” near the border of the territorial sea and the exclusive economic zone (which are also included in the Natura 2000 network) – in particular in relation to the cumulative effects of possible wind energy projects of both countries. Nature Protection Agency points out that the wind energy areas envisaged in the Estonian MSP are located relatively close to the planned Wind Farm Research Area “E5” included in the Latvian MSP, therefore it would be necessary to assess cumulative environmental impacts.

The ministry of Transport has forwarded a comment from Latvian Maritime Administration – drawing attention to one of the aspects already mentioned previously. Namely, one of the water traffic areas at the Latvian border ends up at the Latvian Wind Farm Research Area “E5”. Latvian Maritime Administration reminds that midpoints of the territories reserved for navigation on the Estonian-Latvian border were previously submitted to the Estonian Maritime Administration.

A more critical and concerned opinion was received from the Freeport of Riga Administration. Concerns are expressed about the proposed locations for wind farms in the Estonian MSP and the possible negative impact on safe movement of ships to the Freeport of Riga (also other ports on the coast of the Gulf of Riga). It is emphasized that in order to maintain competitiveness of the Freeport of Riga, it is important to maintain and in no way narrow the existing shipping lanes in the Irbe Strait. These shipping lanes are the only ones that can ensure the entry of cargo and passenger ships into the Gulf of Riga. It is also emphasized that any increase in the distance that is necessary for ships to access the Freeport of Riga, has a significant negative impact. Therefore, it is asked to re-evaluate the direct transboundary impacts in the light of these aspects (or to give explanations with justification if such changes are not planned).

Yours sincerely,



Arnolds Lukšēvics

Director of Environment State Bureau of The Republic of Latvia