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Bundesamt für Seeschifffahrt und Hydrographie
Abteilung O/O33 (Ordnung des Meeres)
Bernhard-Nocht-Str. 78
20359 Hamburg
Germany
e-mail: EingangOdM@bsh.de

Response to early notification for the Strategic Environmental Assessment of the amendment and updating of the Site Development Plan

With reference to your letter (0800O1-5442/002) dated 8 April 2022 concerning the planning procedure for the amendment and updating of the Site Development Plan of offshore wind energy installations and offshore grid connections in the German Exclusive Economic Zone (EEZ) of the North Sea and the Baltic Sea and the related Strategic Environmental Assessment (SEA). Finland has the possibility to participate in the assessment procedures in accordance with article 10 of the Protocol on Strategic Environmental Assessment to the UN/ECE Convention on Environmental Impact Assessment in a Transboundary Context.

Along with the notification letter Finland has received the preliminary draft of the plan as well as the draft scope of the environmental report.

The Finnish Ministry of the Environment would like to inform Germany that Finland does wish to participate in the planning procedure for the amendment and updating of the Site Development Plan and the related Strategic Environmental Assessment.

In order to ensure that in accordance with Article 10 (4) of the SEA Protocol the public and the authorities in Finland are informed and given an opportunity to forward their opinion on the draft plan and the environmental report within a reasonable time frame, Finland requests that the relevant materials will be provided in Finnish.

In the planning and decision-making procedure and related SEA Finland would like to stress the importance of safeguarding the adequate conservation and biological intactness of protected areas as well as establishing sufficient corridors for the movement of wildlife. Both foreseen project sites are situated in areas either overlapping with or adjacent to critical wintering and staging sites for migratory waterbirds. The planned site in the Baltic Sea is also situated within a major corridor for bird migration. In this respect, Finland reiterates the need to take into account relevant international legal obligations, decisions and guidance adopted under AEWA, ASCOBANS, HELCOM, the Convention on Migratory Species (CMS) etc. with respect to windfarm development and the need to



restore and maintain key habitats and species in a favourable conservation status.

It is particularly important to assess potential adverse impacts on globally threatened species, some of which belong to populations shared with Finland such as the Velvet Scoter and Long-tailed Duck. The Ministry wishes to stress in particular the importance of assessing impacts on the Baltic Harbour Porpoise population, which is Critically Endangered (CR). These assessments should include an estimate of the possible cumulative impacts caused by wider windfarm construction.

Yours sincerely,

Permanent Secretary

Juhani Damski

Ministerial Adviser

Lasse Tallskog

For information

The Ministry for Foreign Affairs of Finland

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