



**Sweco AB**

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## CONCERNING THE ENVIRONMENTAL IMPACT ASSESSMENT

16 January 2024

Association "Kraštovaizdis" (hereinafter referred to as "the Association") represents the public concerned in environmental issues and decision-making. UAB "Žalia žemė" is planning to construct up to 117 wind farms (hereinafter referred to as "WPP") with a capacity of up to 8 megawatts and a height of up to 280 metres per wind power plant (hereinafter referred to as "WPP Park") in the territory of the elderships of Alionys, Širvintos and Zibalai in the Širvintos district municipality of Vilnius Region.

The public concerned, represented by the Association, is concerned about the scope and size of the proposed WPP Park and whether its design poses a risk to public health, the environment and nature. The construction of the park is to be located in the area where the people represented by the Association live, and therefore the park has a direct impact on the rights and legitimate interests of these people and on their quality of life and the quality of their environment.

We would like to point out that more than 800 residents of Širvintos district and property owners in the area of the planned WPP Park have appealed to the Mayor of Širvintos district municipality to initiate stricter requirements and to establish larger distances (protection zones) from the planned wind farms to human dwellings, cultural values, protected natural and landscape objects than those currently envisaged by the developers. For comparison: in 2021, the population of Alionys eldership in Širvintos district municipality was 704, that of Zibalai eldership was 934 and that of Širvintos eldership was 2,850 (the latter is the largest commune in terms of area and the second most populous after Širvintai town, but the wind farm will occupy a fraction of the area of the eldership bordering Alionys and Zibalai elderships, <https://geodata.lt/sirvintu-rajono-savivaldybes-gyventoju-skaicius/>). You can see the planned area of the WPP Park here: <https://www.zaliazeme.lt/>. It should be noted that the developer of the WPP Park project provides very little information about the ongoing project, neither to the Association nor to its written requests for information.

We also note that there are no approved special territory planning documents regulating the location of wind farms on the territory of Širvintos District Municipality. This is of particular concern, as it is the spatial planning documents, prepared in accordance with the established procedure, that ensure the compliance of highly significant and large infrastructure projects, their solutions, in the case of WPP Park - the number, size, location and distances of wind farms from human settlements, protected objects, etc. with the requirements of the law, public health and the protection of nature and the environment. There is pressure from wind farm developers to build as many wind farms as possible, despite community opposition and potential negative impacts on natural and cultural values, human health and well-being.

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The Association is aware that the Environmental Impact Assessment (EIA) report for WPP Park is currently being prepared by UAB "Sweco Lietuva", which is responsible for preparing the final EIA report, while the part of the EIA report concerning the protection of wild birds is being prepared by the Lithuanian Ornithological Society.

We are writing to you as the founder of UAB "Sweco Lietuva" and as a leading European engineering and architectural company, whose authority and quality of services are widely known, and whose objectives and results in terms of sustainable environmental development, nature and environment protection are in line with the objectives of the Association. Therefore, we would like to inform you about the challenges that your subsidiary, UAB "Sweco Lietuva", faces (may face) during the preparation of the EIA report for the WPP Park.

The main concerns of the Association are directly related to the preparation of the EIA report for the WPP Park:

1) Wind farm developers, through the EIA report preparers, seek to establish smaller distances from wind farms to wild bird breeding, migration and habitats than recommended by scientists and set out in the Detailed Criteria for Wind Farms Significant Adverse Effects on Birds and Bats, Prevention and Mitigation Measures for Application and Research Requirements, approved by the Minister of Environment of the Republic of Lithuania order Nr. D1-406 on 12th of December, 2023. The following shall be added to the list of measures for the protection of birds and birds of prey and for the protection of species of concern (hereinafter referred to as "the Description") The important distances from the sensitive breeding, foraging (including flying between them), migratory, hibernation and roosting areas of birds and bats, the boundaries of protected areas and the European ecological network "Natura 2000", where wind farms have or may have a significant adverse impact, as well as the other requirements set out in the Description are considered to be scientifically sound and should be maintained in the preparation of the EIA report for WPP Park.

2) The Association is aware that the contract with the Lithuanian Ornithological Society for the preparation of the part of the EIA report related to the protection of wild birds was concluded directly by the developer of the WPP Park project - UAB "Žalia žemė". This casts doubt on the objectivity of this part of the EIA report, as it is in the client's interest that as few bird migration, nesting, breeding, feeding, wintering and aggregation sites as possible are identified in the study area of the WPP Park. To the knowledge of the Association, the Lithuanian Ornithological Society has conducted a survey of nesting sites in the territory of the WPP Park and has not found or recorded any new nesting sites of protected birds in the Protected Species Information System (hereinafter - SRIS). Meanwhile, an ornithologist employed by the Association, who is entitled to register the discovered nesting sites in the SRIS, has found 22 new nesting sites of protected birds in the area of the planned WPP Park





by 1 October 2023 and registered them in the SRIS. Currently, about 60% of the territory of the proposed WPP Park has been surveyed by the ornithologist contracted by the Association. It is clear that the ornithologists hired by the developers of the WPP Park are not carrying out bird monitoring and recording of nesting sites in a proper and quality manner, or have not actually surveyed and studied the area of the WPP Park. Ornithological surveys in an area the size of the proposed WPP Park can be adequately carried out by a minimum of 7-10 specialists working and observing continuously over the changing seasons. However, only one ornithologist was contracted by UAB "Žalia žemė" to carry out the surveys, and it is not clear to what extent and for how long the surveys were carried out. There is a risk that the remaining 40% of the territory of the WPP Park will remain undeveloped and that the EIA report will be inadequately prepared in the absence of complete data, which could cause irreparable damage to nature and wild birds. Currently, the ornithologist employed by the Association has found 36 new nesting sites that are not marked in the SRIS. It is obvious that these nesting sites are for protected birds of prey, but due to the onset of winter it is not possible to carry out further research. It is advisable to assess the nesting sites found and the rest of the unexplored area of the WPP Park in the spring, when the birds return from their wintering grounds and it will be possible to assess the signs of their activity. In the opinion of the Association, the Lithuanian Ornithological Society did not carry out a proper study on the conservation of wild birds when preparing the EIA report.

3) UAB "Sweco Lietuva" has been informed about the extremely poor quality of the EIA report. Sweco Lietuva is responsible for preparing and approving the final EIA report for the WPP Park. In the opinion of the Association, the approval of such an extremely poorly prepared EIA report cannot be allowed, as it would cause irreparable damage not only to the natural environment and the public interest, but also to the business reputation of the company.

The Association, taking into account the very high standards of professionalism, reputation and environmental protection that you have set for your activities, asks you to ensure that UAB "Sweco Lietuva" does not sign and submit for further approval the EIA report for the WPP Park, the ornithological part of which has been inadequately prepared. Although this part was not prepared by UAB "Sweco Lietuva", it is UAB "Sweco Lietuva" that will bear the full responsibility (including reputation) for the inadequately prepared EIA report.

Contact e-mail address: [dokumentai@krastovaizdis.eu](mailto:dokumentai@krastovaizdis.eu).

The Association can provide all necessary information if required.

Yours faithfully,

President of the "Kraštovaizdis" Association

Teisutis Buda

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