



## LIETUVOS RESPUBLIKOS APLINKOS MINISTERIJA

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2015-12-29

Nr. (10-3)-D8-9717

I

Nr.

### DĖL JUODYMO DURPIŲ TELKINYJE PLANUOJAMOS ŪKINĖS VEIKLOS

Informuojame, kad LR aplinkos ministerija 2015 m. lapkričio 26 d. raštu Nr. (10-3)-D8-8777 kreipėsi į Latvijos Respublikos aplinkos apsaugos ir regioninės plėtros ministeriją prašydama pranešti, ar Latvija dalyvaus UAB „Legra“ planuojamo Juodymo durpių telkinio naudojimo tarpvalstybinio poveikio aplinkai vertinimo procese. 2015 m. gruodžio 21 d. Latvijos aplinkos apsaugos biuras (toliau – Biuras) raštu Nr. 3-01/2049 informavo, kad Latvija tarpvalstybinio poveikio aplinkai vertinimo procese nedalyvaus, jeigu atliekant poveikio aplinkai vertinimą bus atsižvelgta į siūlymus įvertinti poveikį Latvijos teritorijoje esančiai Juodymo pelkei ir gretimoms miškams, išdėstytus Biuro raštuose Nr. 3-01/2049 ir Nr. 3-01/1069.

Atsižvelgiant į Latvijos siūlymus ir nuogastavimus, poveikio aplinkai vertinimo programoje ir ataskaitoje turi būti aiškiai nurodyta, kad 50 m buferinėje zonoje iki sienos su Latvijos Respublika nebus vykdomi kasybos darbai, įskaitant apjuosiančių griovių kasimą. Be to, PAV ataskaitoje turi būti pateikti poveikio Latvijos teritorijoje esančiai Juodymo pelkei ir gretimoms miškams įvertinimo rezultatai.

Kadangi Latvijos aplinkos apsaugos biuras paprašė pateikti parengtą poveikio aplinkai vertinimo ataskaitą, vadovaujantis Europos Sąjungos aplinkos apsaugos politikos „teršėjas moka“ principu, planuojamos veiklos užsakovas ar PAV dokumentų rengėjas turės pateikti Aplinkos ministerijai planuojamos ūkinės veiklos poveikio aplinkai vertinimo ataskaitą lietuvių kalba (gali būti pateikta elektroniniu formatu) ir poveikio aplinkai vertinimo ataskaitos santrauką, kuri apimtų ir poveikio Latvijos aplinkai įvertinimo rezultatus anglų kalba (raštu ir el. formatu). Gavusi šiuos dokumentus, Aplinkos ministerija juos perduos Biurui.

#### PRIDEDAMA:

1. 2015-12-21 Latvijos aplinkos apsaugos biuro rašto Nr. 3-01/2049 kopija, 2 lapai.
2. 2015-05-11 Latvijos aplinkos apsaugos biuro rašto Nr. 3-01/1069 kopija, 2 lapai.

Aplinkos viceministras

Algirdas Genevičius

M. Masaitytė, 8 706 63654, el. p. mogle.masaityte@am.lt





Vides pārraudzības valsts birojs  
*Environment State Bureau of the Republic of Latvia*

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Rīga

December 21, 2015 No 3-01/2049

Ref. to: November 26, 2015 No (10-3)-D8-8777

Mr. Vitalijus Auglys  
Director of Pollution Prevention Department  
Ministry of Environment of the Republic of Lithuania  
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**Regarding the notification about initiation of a second environmental impact assessment procedure for the planned peat extraction in Juodymas peat deposit**

Environment State Bureau (hereinafter – the Bureau) acting as a competent authority on environmental impact assessment in Latvia would like to thank the Ministry of Environment of the Republic of Lithuania for notification about initiation of a second environmental impact assessment procedure (hereinafter – EIA) for the planned peat extraction in Juodymas peat deposit (hereinafter – the Project).

The Bureau acknowledges receipt of the notification and prepared documentation. From the documentation we conclude that another EIA procedure is commenced for the planned peat extraction in the same Juodymas peat deposit, in the same territory, only with a slight difference in location and total area. Information about commencement of a second EIA was made publicly available and during the consultation process Bureau has received objection letters from UAB "GJ Magma" and UAB "Nereta" regarding the fact that two parallel procedures of EIA are being carried out for equal activities in the same territory.

Refraining from estimations regarding established national practices for EIA and its procedures, the Bureau concludes that there are no major differences planned by the second Project for the possible peat extraction in the territory at the border with the Republic of Latvia. Therefore we sustain the same comments and requirements that were submitted on May 11, 2015 by letter No 3-01/1069. We kindly ask you to ensure that equal provisions are applied to both EIA procedures, namely, it is necessary to perform expert inspections of species, habitats – including bird fauna, and to prepare opinions on the potential impact on the Latvian part of Juodymas bog and its adjacent forests. At the same time, it is necessary to foresee an unequivocal indication that no extraction works including excavation of ditches or formation of embankments may be permitted in the projected 50 m wide buffer zone along the border of Latvia.

If these conditions are met, - Bureau can agree with the opinion previously expressed by Ministry of Environment of the Republic of Lithuania, that no significant adverse impacts are most likely to be expected. Taking into account afore mentioned, Latvia does not find it necessary to take full participation in the transboundary consultation process as the affected party. Nevertheless, having in mind the nature of The Project and close vicinity, we kindly ask you to provide us with the findings of environmental impact assessment and the related

documents, especially in relation to the aspects indicated by our side. From the letters received from UAB "GJ Magma" and UAB "Nereta" we conclude that the first findings have recently been made publicly available.

Yours sincerely,  
Arnolds Lukšēvics

Director of Environment State Bureau of the Republic of Latvia

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Riga

May 11, 2015 No 3-01/1069

Ref. to: April 14, 2015 No (10-3)-D8-2769

**Mr. Vitalijus Auglys**  
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**Regarding the notification about environmental impact assessment for the planned peat extraction in Juodymas peat deposit**

Environment State Bureau (hereinafter – the Bureau) acting as a competent authority on environmental impact assessment in Latvia would like to thank the Ministry of Environment of the Republic of Lithuania for notification about environmental impact assessment for the planned peat extraction in Juodymas peat deposit (hereinafter – the Project).

The Bureau acknowledges receipt of the notification and prepared summary of program for Environmental impact assessment (hereinafter the EIA Program). Bureau also confirms that information about the Project and the EIA Program was made publicly available on the website of Bureau ([www.vpvb.gov.lv](http://www.vpvb.gov.lv)). Comments from the Nature Conservation Agency and State Environmental Service were received.

Having reviewed the documents and the available information about the nature treasures on the Latvian side next to the projected peat extraction territory, we would like to point out the following:

1. It is planned to perform peat extraction from Juodymas peat deposit that is located on the state border of Latvia. The central part of Juodymas bog is formed by the raised (moss) bog, with passages and marshes on the side parts. A part of the raised bog in the area of 10 – 15 ha, as well as bog edges with other types of deposits are located in the territory of Latvia. The resource calculation for the deposit that was last made in 1975, included also the part of the bog located in the territory of Latvia, that comprised around 410 hectares. It is planned to extract peat in the area of approximately 259 hectares that would mainly come from the moss bog where the greatest part of deposit resources is formed by the raised bog peat.
2. According to the information provided, peat will be extracted in a quite large area (258.71 hectares), and the most significant impacts caused during the proposed activity are expected to be: impact on the hydrological and hydrogeological conditions of the territory, impact on Kebelis mossy area of the bog located in the territory of the Republic of Latvia, dust and noise, as well as an increased risk of peatland fires. Considering the scope of the proposed activity, it is expected that to some extent the said impacts will be observed also in the territory of the Republic of Latvia.



3. There are no specially protected nature territories located nearby in the territory of the Republic of Latvia. The distance to the nearest specially protected nature territory of European significance (*Natura 2000*) is approximately 9.7 km, whereas to the nearest microreserve – 3.1 km.
4. Judging by the available materials (orthophoto, geomorphological map, forest survey maps), the following European Union protected habitats are found near the extraction territory on the Latvian side: active raised bogs (7110\*), bog woodlands (91D0\*) and coniferous forests on, or connected to, glaciofluvial eskers (9060).
5. During peat extraction it is planned to lower the water levels accordingly and discharge water in the southern direction towards Nereta River and further down to Nemunelis River.
6. According to the Map browser (aerophotography period 2013-2015), there is no peat extraction carried out in Joydymas peat deposit in Rokiskis County of the Republic of Lithuania; neither a peat extraction site has been constructed nor a respective land reclamation system developed. The territory of the bog is intersected by several ditches that are connected with Nereta River in the territory of the Republic of Lithuania. For this reason it can be assumed that in order to perform peat extraction in the area of 258.71 hectares, it will be necessary to carry out extensive preparatory work for the peat extraction site, development of the land reclamation system, drainage of the peat extraction site that in a long-term may impact, for example, Kebeli mossy area of the bog located in the territory of the Republic of Latvia, as well as its hydrogeological and hydrologic conditions. In a long-term, lowering of the water level will initiate mineralization of peat and stimulate the growth of standing timber in the adjacent bog territory near the extraction territory (in a distance of up to 100-150 m), including in the Latvian part.
7. Considering non-existence of protected territories in this zone, it is expected that in the selected extraction alternative peat extraction will cause comparatively insignificant impact on the nature and landscape treasures, as well as on the groundwater regimes in the territory of Latvia. However, taking into account that there is no precise and specific data available about the treasures found on the Latvian side, it is necessary to include the following conditions in the EIA Program:
  - 7.1. A requirement to perform expert inspections of species, habitats and bird fauna, and to prepare opinions on the potential impact on the Latvian part of Juodymas bog and its adjacent forests;
  - 7.2. An unequivocal indication that no extraction works including excavation of ditches or formation of embankments may be permitted in the projected 50 m wide buffer zone along the border of Latvia.

If these conditions are met, - Bureau can agree with the opinion expressed by Ministry of Environment of the Republic of Lithuania, that no significant adverse impacts are most likely to be expected. Taking into account afore mentioned, Latvia does not find it necessary to take full participation in the transboundary consultation process as the affected party. Nevertheless, having in mind the nature of The Project and close vicinity, we kindly ask you to provide us with the findings of environmental impact assessment and the related documents, especially in relation to the concerns drawn by our side.

Yours sincerely,  
Arnolds Lukšēvics  
Director of Environment State Bureau of the Republic of Latvia

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