The Sovereign Nation of Shetland
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30 October 2026
Our ref: 067TSNS261030

By Royal Mail Signed For No. KL 393919701GB

Stephen Wheeler
Managing Director
SSE Renewables
Inveralmond House
200 Dunkeld Road
Perth
Perthshire
PH1 3AQ

Dear Stephen Wheeler.

FORMAL REQUEST FOR EVIDENCE — Viking Energy Wind Farm: Environmental Monitoring, Turbine-Blade Erosion, Maintenance, Damage Investigation and Legal Authority

The Sovereign Nation of Shetland (TSNS) is commencing a public programme of investigation into the environmental consequences of industrial development in Shetland, beginning with Viking Energy Wind Farm.

Our purpose is to establish the relevant facts, examine the legal authority relied upon, identify environmental damage and risks, and determine what measures may be necessary to protect and restore the affected environment.

We invite Viking Energy to cooperate by providing the information and documents requested below.

1. Turbine-blade erosion and material loss

Leading-edge erosion is a recognised problem within the wind industry. A 2019 scientific review by Herring and colleagues documents extensive blade repairs at established wind farms, together with the difficulties of maintaining protective coatings and the limited durability of some repairs.

A Norwegian report published in 2021 discusses an estimate attributed to NORWEA of up to 150 grams of blade material lost per turbine annually. Applied hypothetically to Viking's 103 turbines, that would represent approximately 15.45 kilograms annually. We recognise that this is not a measurement of erosion at Viking.

Please provide:

1. The manufacturer, model, dimensions and material specifications of the turbine blades installed at Viking, including their protective coatings, resins and leading-edge protection systems.
2. The manufacturer's predicted erosion rates and expected blade and coating service lives under Shetland's operating conditions.

3. All available blade inspection reports, photographic surveys and assessments of erosion, cracking, delamination or other deterioration since commissioning.
4. Records of blade repairs, replacement of protective materials and complete blade replacements, including dates, turbine identifiers and reasons for the work.
5. Any measurements or estimates of material lost through erosion, and any assessments of where that material is deposited.
6. The inspection frequency, maintenance standards and criteria for deciding when erosion requires remedial action.

2. Bisphenol A and other potentially harmful substances

Some wind turbine blade composites incorporate epoxy resins manufactured using bisphenol A (BPA). The presence of such resins does not, by itself, establish that free BPA is released into the environment. Nevertheless, the potential environmental consequences warrant examination.

Directive (EU) 2020/2184 records a WHO-proposed monitoring benchmark of 0.1 micrograms of BPA per litre of water. At that concentration, one gram of dissolved BPA would be sufficient to produce the benchmark concentration in ten million litres of water.

For comparison, the Directive specifies an EU drinking-water parametric value of 2.5 micrograms per litre, equivalent to one gram in 400,000 litres. These are theoretical dilution calculations, not evidence of contamination at Viking, nor an assertion that either concentration establishes ecological harm.

Please provide:

1. Confirmation of whether BPA-derived epoxy resins or other BPA-containing materials are present in Viking's turbine blades and coatings, identifying the relevant products.
2. The available chemical composition information, safety data sheets and environmental assessments for those materials.
3. Any studies commissioned or relied upon concerning the release of BPA, microplastics, composite particles or other potentially harmful substances through erosion, weathering or blade damage.
4. Details and results of any sampling or monitoring of soil, peat, surface water, sediments or aquatic life for such substances.
5. Confirmation of whether independent monitoring has been undertaken specifically to assess blade-material emissions and their environmental consequences.

If no such monitoring has been undertaken, please explain the basis upon which Viking Energy has concluded that it is unnecessary.

3. Damaged turbine blade — October 2024

On 31 October 2024, serious damage to a turbine blade near Vidlin was publicly reported. It was also reported that Vestas had commenced an investigation.

Please provide:

1. The complete findings of that investigation, including the identified cause of failure.
2. The turbine identification, date of the incident and extent of damage.
3. Records of the quantity, location and composition of material released.
4. The arrangements for locating, collecting and disposing of debris, including any records of material not recovered.

5. Any environmental assessments, sampling results or remediation undertaken following the incident.
6. Details of any other blade failures, significant damage incidents or blade replacements at Viking since commissioning.

Two replacement turbine blades were personally observed on the quayside at Lerwick around the time of the reported replacement. We would appreciate clarification of the purpose and destination of both blades, including whether more than one turbine required replacement components.

4. The Burn of Lunklet and wider environmental monitoring

Concerns have previously been reported regarding the condition of the Burn of Lunklet following wind farm construction, including siltation, acidification, trace metals and effects on aquatic life.

Please provide:

1. Environmental monitoring reports concerning the Burn of Lunklet and other watercourses affected by Viking's construction or operation.
2. Records of pollution incidents, complaints, investigations and communications with SEPA or other regulators.
3. Details of remedial work undertaken and the evidence used to assess its effectiveness.
4. The current environmental monitoring programme for peat, watercourses, drainage, wildlife and habitats.
5. Any outstanding environmental restoration obligations and the arrangements for fulfilling them.

5. Statutory consent, land rights and legal authority

TSNS is separately examining the historical and legal basis of the Crown's asserted authority in Shetland, as set out in our Foundation Corpus: https:/?/?www.?sovereignshetland.?com/?2026/?foundation/?index.?html?

We distinguish that constitutional question from the particular statutory powers, property rights and legal instruments relied upon to authorise Viking Energy.

Please identify, and provide copies or accessible references for:

1. The section 36 consent, deemed planning permission, subsequent variations and all applicable environmental conditions.
2. The landownership, leases, servitudes and other property rights relied upon for the turbines, access roads, foundations, drainage and associated infrastructure.
3. The relevant consents or permissions affecting watercourses, peatland and protected habitats.
4. The authorities responsible for monitoring compliance with each principal consent and environmental obligation.
5. Any legal opinion or formal determination held by Viking Energy specifically addressing the territorial application of the statutory powers relied upon in Shetland, or confirmation that no such document is held.

We do not suggest that a failure to answer an historical title enquiry automatically invalidates an individual consent. Our purpose is to identify the legal instruments and evidence upon which the development actually relies.

6. Disclosure and public accountability

We appreciate that some documents may contain commercially sensitive information. Where disclosure of a complete document is considered inappropriate, please identify it, explain the specific reason and consider providing a redacted copy or a substantive summary.

Where information is held by Vestas, SSE or another contractor or associated organisation, please identify the holder and, where practicable, forward the request or obtain the relevant material.

TSNS intends to publish material correspondence and evidence arising from this investigation on its website so that the people of Shetland can examine the findings for themselves. We will distinguish documented facts from matters requiring further investigation.

7. Response requested

Please acknowledge receipt within seven days and provide a substantive response within **21 days of receipt**.

If the volume of material makes full disclosure impracticable within that period, please provide the documents readily available, identify those outstanding and propose a reasonable timetable for their production.

Our intention is to establish the facts through an open, peaceful and evidence-based process. We hope Viking Energy will recognise the public interest in the matters raised and cooperate accordingly.

References

1. Herring, R., Dyer, K., Martin, F. and Ward, C. (2019), *The increasing importance of leading edge erosion and a review of existing protection solutions*, Renewable and Sustainable Energy Reviews, 115, 109382. https:/?/?doi.?org/?10.?1016/?j.?rser.?2019.?109382?
2. Norwegian leading-edge erosion report (2021), citing an estimate attributed to NORWEA of up to 150 grams of blade material per turbine per year. https:/?/?www.?sovereignshetland.?com/?2026/?documents/?Otherdocuments/?Leading_?Edge_?Wind_?Turbine_?Blade_?Erosion.?pdf?
3. Directive (EU) 2020/2184 on the quality of water intended for human consumption, Recital 5 and Annex I, Part B. https:/?/?eur-?lex.?europa.?eu/?legal-?content/?EN/?TXT/?PDF/???uri=?CELEX:32020L2184?
4. TSNS Foundation Corpus. https:/?/?www.?sovereignshetland.?com/?2026/?foundation/?index.?html?

Regards,



Stuart Hill