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Mottagare

Naturvårdsverket

Opinion on the planned wind farm outside Klaipeda in Lithuania's economic zone

Swedish Pelagic Federation Producer Organization (SPF) represents all Swedish fishing vessels in the pelagic fishery, including the herring and sprat fishery in the Baltic Sea. Every year our members account for approximately 90 percent of the total fished volume in Sweden. We thank you for the opportunity to submit our comments.

Potential cross-border effects

The planned wind farm outside Klaipeda can potentially have a negative effect on fish stocks caught by Swedish fishermen through underwater noise, vibrations, changing currents or electromagnetic fields around cables. The present knowledge about these influencing factors and their effect on the underwater fauna is severely lacking. SPF therefore consider that it is of utmost importance that these factors and their cumulative effects on fish and other underwater fauna are carefully investigated in the forthcoming Environmental Impact Assessment (EIA).

We have member vessels that have increased their fishing in the relevant area in recent years. Pelagic fishery with midwater trawls cannot be performed in between the windmills, therefore all wind farms must be regarded as closed areas to fishing for our members. Thus, a wind farm will have a negative effect on the possibility to fish efficiently in a productive fishing area. However, the possible negative effects from a wind farm on fish spawning, foraging for food, migrations etc. may pose even more serious consequences in the long term for our members, if important fish stocks are affected negatively.

Participation in the environmental impact assessment (EIA)

SPF believes that Sweden should participate in the continued progress of the Environmental Impact Assessment (EIA). It is essential that the possible effects of the planned wind farm on fish stocks in the Baltic Sea are carefully investigated and that the cumulative effects of this and other planned and existing wind farms in the Baltic Sea are taken into account in the analysis.

The EIA should describe the expected effects on the fish stocks and fishery during both construction and continuous operation and decommissioning of the wind farm. For fishing practices, a reference timeframe of at least 10-15 years should be used.

In the document distributed to us, only the potential positive effects on the stocks that the park may have through reduced fishing in the area are mentioned. SPF believes that both positive and negative effects on fish stocks must be highlighted in the EIA and that it must be taken into account that fish species differ from each other and will react differently to different types of disturbance. Furthermore, both short- and long-term consequences of the wind farm establishment should be analysed and reported. On page 20 of the summary impact assessment that we have had access to, it appears

that studies/research will be carried out with regard to benthic habitat, birds, bats and marine mammals. SPF is of the opinion that effects on relevant fish species also must be studied.

Annelie Rosell, SPF