

Naturvårdsverket  
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## Statement by the County Administrative Board of Gotland on the planned offshore wind farm park *Baltyk I* in Polish EEZ.

The County Administrative Board of Gotland suggests that Sweden plays a continued role in the coming environmental impact assessment for the project *Baltyk I* in the Polish EEZ. The County Board also suggests that the cumulative effects with the multiple disturbances in the region is thoroughly addressed in the coming environmental impact assessment (EIA).

Majority of the wintering population of the long-tailed duck (*Clangula hyemalis*) in the Baltic Sea searches for food on the shallow offshore reefs located within Sweden's EEZ. This is also true for the critically endangered Baltic proper harbour porpoise (*Phocoena phocoena*). In 2016 a Natura 2000 area was established to protect these species as well as others within Swedish waters due to the responsibilities Sweden holds in conserving the species and their associated habitats and allowing them to gain a favourable conservation status. The planned offshore wind farm *Baltyk I* is most likely to impact the conservation of these species within Swedish waters and thus the County Administrative Board of Gotland wants Sweden to be part of evaluating the environmental impact assessment plan for the project.

The proposed area for development of *Baltyk I* is in very close proximity, approximately 3 km away from the Natura 2000 area Hoburgs bank and Midsjöbankarna (SE0330308) located in Swedish waters. The target species for the protected area are the Baltic Proper harbour porpoise (*P. phocoena*), the long-tailed duck (*C. hyemalis*), the black guillemot (*Cheppus grylle*), the blue mussel (*Mytilus edulis*) which for biogenic reefs, and the habitats Reefs (1170) and Sandbanks (1110).

The Baltic Proper harbour porpoise is critically endangered and the proposed construction of *Baltyk I* is located within one of the species' vital hotspots for reproduction and calving. The generation of impulsive and continuous noise could result in temporary hearing damage, permanent hearing damage and even death. It is therefore of high importance to protect this population from further decline, and regulations regarding construction is important. Construction should not

take place between May to October to protect adults and calves. Harbour porpoises are particularly sensitive to loud impulsive noise emissions and are known to avoid operational wind farms. Noise reduction methods and other ways to avoid harm to harbour porpoises need to be included in detail in the EIA. The effect on the fish community, with emphasis on hearing specialists such as herring (*Culpea harengus*) and European sprat (*Sprattus sprattus*) also needs to be assessed.

A large part of the European population of the near threatened long-tailed duck aggregate during winter to feed on shallow offshore banks, such as the Southern Midsjöbank. Sweden has a particular responsibility for the conservation status according to the birds directive (2009/147/EG). The proposed wind farm is located at depths that correlates with the feeding preference for long-tailed duck and black guillemot, and both species are known to avoid wind farms during the operational phase. Blue mussel bed habitats are a threatened habitat in the Baltic Sea according to HELCOM and a main food source for divers and wintering birds in the area. Buffer zones to important feeding areas should be considered in the coming EIA and the location of the wind farm should be at greater depth than 30 meters, to avoid damaging critically important habitats.

Cumulative effects and habitat loss must be detailed in the coming EIA. Effects of all stages of construction, operations and dismantling of the wind farm needs to be addressed in the coming EIA. Specific emphasis on the effects and protective measures regarding harbour porpoise, long-tailed duck and blue mussel reefs. This needs to be investigated to great extent to ensure that the coming project doesn't disturb or increase mortality in vulnerable species and habitats.

In summary, we suggest further involvement from Swedish authorities since the location of the proposed wind farm is adjacent to a Swedish protected area and close to the Swedish EEZ. We are currently in the process of assessing a potential permit for an offshore wind farm located within the Swedish EEZ on the Southern Midsea bank. It is thus important that the cumulative effects of multiple wind farms in the area are internationally investigated.

### Decision maker and rapporteur

This decision has been made by unit director of the water and environmental department Karin Fager with ocean administrator Alexandra Colbing as rapporteur. Ocean administrator Rozemarijn Keuning has also taken part in the preparation of this statement.

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