Statement 1 (2)

Date 2022-09-23

511-7858-2022 NV-07646-22

Naturvårdsverket

Comments from the county board in Kalmar regarding the information for the planned offshore wind farm Baltyk I in Polish EEZ

The county board in Kalmar suggests that Sweden should play a continues role in the coming EIA process and future environmental assessments 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).

Sweden has a particular role in protecting wintering birds such as the long-tailed duck (*Clangula hyemalis*) and the Baltic population of harbour porpoise (*Phocoena phocoena*), since the core area for these species are mainly on Swedish waters. The wind farm Baltyk I is likely going to affect these vulnerable species and therefore we suggest that Sweden is a continues part of the process henceforth.

The proposed area for development is in very close proximity, 3 km away, to the Natura 2000 area Hoburgs bank and Midsjöbankarna (SE0330308) in Swedish waters. The aimed species for protection the area is the Baltic Sea population of harbour porpoise, long-tailed duck, black guillemot (*Cheppus grylle*), mussel reefs (*Mytilus edulis*) and sandbanks. The county board see a risk of disturbance and potentially unacceptable increased mortality in these protected species and habitats.

The Baltic population of harbour porpoise is critically endangered and the proposed construction of Baltyk I is in the core area for the reproduction and calving area. 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 needs to be included in detail in the EIA. The effect on the fish community, with emphasis on hearing

511-7858-2022 NV-07646-22

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 Södra Midsjöbanken. 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 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.

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 assessment of a wind farm on the Swedish side of Södra Midsjöbanken and the cumulative effects should be internationally investigated.

Contact

Please contact Amanda Östman for further questions. Phone +04610-233 83 72 email <u>Amanda.ostman@lansstyrelsen.se</u>, please use reference number 7858-2022.

Martin Unell, unit manager for nature conservation at County Administrative Board of Kalmar County (digitally signed)