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Synpunkter på planerna att etablera en havsbaserad vindkraftspark Klaipeda, i enlighet med Artikel 4 i konventionen om miljökonsekvensbeskrivningar i ett gränsöverskridande sammanhang (Esbokonventionen)

Miljöministeriet i Litauen har underrättat Sverige/Naturvårdsverket om att landet nu inleder gränsöverskridande samråd i enlighet med artikel 4 Esbokonventionen. BirdLife Sverige har i enlighet med Esbokonventionen erbjudits möjlighet att komma med synpunkter på den planerade vindkraftsparken. Sådant önskemål angavs inte i samrådsbrevet, men då vi tidigare uppfattat att det är önskvärt anges BirdLife Sveriges kortfattade ståndpunkter nedan på engelska.

Obvious conflict with nature legislation

As presented in the EIA report, there is *"a great probability of decrease in density of the protected species of birds in the adjacent Natura 2000 area"*. Proceedings of any project facing such probability, even if placed outside of the Natura 2000 site, is a clear breach of the existing nature legislation of the European Union. The European Court of Justice has declared that even *a risk of such effects* activates the prohibitive rules of the nature directives. **Therefore, the planned project *can not* be permitted under current circumstances**, but possibly by "moving" the wind farm to a location further west, where significant effects on (mainly) wintering velvet scoters can be avoided. It should be noted that potential cumulative effects from e.g. a planned wind farm on the latvian side of the border have to be taken into account. It is also of great importance to evaluate the cumulative effects from the wind farm(s) together with other activities, such as shipping and fishing, affecting bird populations being present in the area.

BirdLife Sweden strongly recommends that the Lithuanian government and responsible authorities include obligatory measures for all future offshore windfarms, including Klaipeda, to install shut-down mechanisms that can be activated when large numbers of nocturnally migrating birds are registered passing through the wind farm area, as has already been done in The Netherlands (an example that we expect Sweden and other countries to follow in the near future). This only happens under certain and quite rare weather conditions, particularly foggy nights when there is little wind anyway (hence causing limited reduction in energy production) during spring and autumn, and may then lead to "mass collision events". Such easily predicted and significantly negative effects on wildlife must be avoided.

För BirdLife Sverige,



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