

Yttrande inom miljöprövning

Handläggare

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Datum 2024-05-08

Dnr 2024-001657

Naturvårdsverket
registrator@naturvardsverket.se
Dnr NV-03744-24

Yttrande över samråd enligt Esbokonventionen gällande den planerade havsbaserade vindkraftparken med projektnamnet "Area O-2.2" i Tysklands ekonomiska zon

Havs- och vattenmyndigheten har beretts tillfälle att yttra sig över ovan rubricerat ärende. Myndigheten lämnar här följande yttrande.

Havs- och vattenmyndighetens inställning

Havs- och vattenmyndigheten har tagit del av samrådsunderlaget och bedömer att det finns risk att den planerade vindkraftparken "Area O-2.2" kan medföra gränsöverskridande miljöpåverkan för Sverige. De förväntade påverkansområdena kan sammanfattningsvis beskrivas som: kumulativa effekter av flertalet vindkraftparker i området, närvaron av tumlare som tillhör den kritiskt hotade östersjöpopulationen samt närvaro av östersjötorsks vars bestånd för närvarande har dålig status. Sverige bör därför delta i processen med att ta fram en miljökonsekvensbeskrivning. Havs- och vattenmyndigheten lämnar här våra synpunkter gällande eventuell gränsöverskridande miljöpåverkan på engelska enligt önskemål från Naturvårdsverket.

Beskrivning av ärendet

Baltic Sea OFW O-2.2 GmbH ansöker om att uppförande och drift av 48—70 vindkraftverk i den tyska ekonomiska zonen, ca 24 km nordost om ön Rügen, i Östersjön. Projektområdet omfattar en total yta på 102 km². Om tillstånd beviljas förväntas byggnationen av vindkraftsparken påbörjas under första kvartalet 2028, och fortskrida fram till sista kvartalet av 2030. Flera andra parker finns eller planeras i området, exempelvis Wikinger, Arkona, Baltic Eagle, Arcadis Ost 1 och Windanker.

The Swedish Agency for Marine and Water Management's views of the "Area O-2.2" offshore wind farm project

The Swedish Agency for Marine and water Management (SwAM) would like to participate in the continued work with the environmental impact assessment. SwAM can identify three main focus

areas that may present transboundary environmental impacts. These impacts, listed below, need to be described in detail in the coming environmental impact assessment (EIA).

- Cumulative impact assessment
- Impact of underwater noise on harbour porpoises
- Impact of increased suspended sediment concentrations (SSC) and underwater noise on Baltic cod

Reasoning

Cumulative Impact Assessment

The intensive expansion of wind power at sea is an important source to supply Europe with renewable energy. Nevertheless, it is important that the development is carried out with respect to ecological systems. As described in the consultation papers, there are currently several offshore wind farm projects, at different stages of construction, in the region around “Area O-2.2”. Some are already up and running and some are still in the planning/building phase. At the same time the Baltic Sea is affected by several other activities e.g. maritime and fishing. Concerning transboundary environmental impacts SwAM considers cumulative effects need to be properly described and assessed in the coming EIA. Description of cumulative impacts should, when relevant, also include activities in other countries’ maritime zones in the southern Baltic Sea.

Impact of underwater noise on harbour porpoises

In the region around “Area O-2.2” harbour porpoises have been reported to be present throughout the year. The individuals can belong to either the Western Baltic population or the critically endangered Baltic Proper population. SwAM believe that there is a risk of transboundary environmental impact if long term or fatal injuries on (especially Baltic Proper) porpoises would occur. Due to the sensitivity of harbour porpoises to under water noise SwAM would like to stress the need for protective measures when carrying out sound generating activities. It is understood that monopiles and/or jacket foundations are likely alternatives for the project, both of which require pile driving (unless suction buckets are used). The most severe segment of construction, in terms of generating underwater noise, is generally pile driving which should preferably be avoided or significantly reduced during certain time periods. During May—October individuals belonging to the Baltic Proper population of harbour porpoises aggregate around the offshore banks south of Gotland and east of Öland, meaning individuals are least likely to be present in the region near “Area-O2.2” at that time. For the purpose of protecting the endangered Baltic Sea harbour porpoise, the period between May—October is more appropriate for activities such as piling and seismic surveys.

Furthermore, SwAM wish that mitigating measures such as state-of the-art technical solutions be applied in order to minimise impacts of pile-driving to the fullest extent.

Impact on Baltic Cod

Both eastern and western populations of Baltic cod reside in the area of the planned project. Both populations are below safe biological limits. In terms of negative impact on cod stocks, increased suspended sediments concentrations (SSC) and noise generating activities pose a risk. Amongst fish, cod are considered to have good hearing and use clicking sounds to communicate. As a consequence they are sensitive to underwater noise. Noise emissions during the construction

phase will thus have a negative impact on cod, and other fish with sensitive hearing, ultimately causing auditory damage or in worst case death. An increase in SSC is mainly of concern when there are eggs and larvae present. SwAM believe that there is a risk of transboundary environmental impact if construction tasks that cause severe underwater noise or abnormal SSC coincide with sensitive time periods for cod, i.e. spawning season. It is important to avoid adding further stress to Baltic cod populations considering their poor state, and especially during biologically sensitive periods such as spawning. SwAM consider it key that periods of spawning for cod as well as suggestions for adequate preventive measures are described in the coming EIA.

Beslut om detta yttrande har fattats av enhetschefen Johan Stål efter föredragning av utredaren Josefin Sefbom. I den slutliga handläggningen av ärendet har även verksjuristen Pontus Nilsson medverkat.


Johan Stål