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**Swedish answers to the notification in accordance with Articles 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) regarding the planned offshore windfarm Area O-2.2**

Sweden received a notification from the Federal Maritime and Hydrographic Agency in Germany, to participate in consultation under Article 3 of the Espoo Convention in relation to the planned offshore windfarm (OWF) in Area O-2.2. Germany has fulfilled their responsibility following from article 3 of the Espoo Convention by providing the Swedish environmental protection agency (EPA) with a notification regarding the project.

The Swedish EPA has in turn invited Swedish government agencies, organizations, and other parties to give consultation comments on the scope of the planned project.

**Consultation in Sweden**

The notification and the attached documents have been circulated for consideration to central-government agencies, county administrative boards, non-governmental environmental organizations during the period from 26<sup>th</sup> of April 2024 to 13<sup>th</sup> of May 2024.

The Swedish EPA is the authority responsible for fulfilling the obligations following from, inter alia. Article 3 of the Espoo Convention. However, the Swedish EPA has no responsibility to evaluate the consultations received in the context of the Swedish national consultation procedure with a view to presenting an overall Swedish position. For a comprehensive view of the consultations, we refer to the enclosed statements received.

### **Consultations comments received**

A summary of the statements is included below, please note that the summary is written on behalf of the Swedish EPA and not the body to which a proposal is referred for consideration:

The Swedish EPA received replies from the Swedish Agency for Marine and Water Management, the Swedish Meteorological and Hydrological Institute, the Swedish Geotechnical Institute, Geological Survey of Sweden, The Swedish Transport Agency, BirdLife Sverige, Swedish Pelagic Federation PO.

*The Swedish Agency for Marine and Water Management* assesses that the planned OWF project might cause transboundary impacts on Sweden and summarizes potential impact to cumulative effects of the majority of wind farms in the area, the presence of harbour porpoises, which belong to the critically endangered Baltic Sea population and the presence of Baltic Sea cod whose stock currently has a poor status.

*The Swedish Meteorological and Hydrological Institute* highlights the need to assess the cumulative effects as one OWF projects impacts might be small but the cumulative effects might be significant in a transboundary context. This is due to the large number of existing and planned OWF projects in the southern parts of the Baltic Sea.

*The Swedish Geotechnical Institute* believes that environmental geotechnical risks in the area of the wind farms should be investigated at an early stage. These risks include sediment transport (erosion and turbidity) and possible contaminated sediments. Also the importance to investigate the pollution situation at depth, especially if fine-grained sediments are encountered, as deeper sediments may become cloudy during the construction work.

*Geological Survey of Sweden* assesses that interventions in the seabed, such as dredging, drilling, laying of cable, are considered in the EIA. Young muddy sediments (postglacial clays) may contain environmental toxins which then risk spreading. Possible consequences caused by sediment spreading and turbidity as well as possible content of environmental toxins should be investigated in the upcoming environmental impact statement (EIA) and preceded by investigations to enable correct assessments.

*The Swedish Transport Agency* does not see the need for further participation but notes that the planned project area is close to several maritime traffic route connecting Sweden and Germany in the southern Baltic Sea and that needs to be considered.

*BirdLife Sverige* believes that the planned project can have significant environmental consequences and that Sweden should participate in the continued process. The association chooses at this stage to primarily comment that investigations must be carried out regarding both night-migrating and day-migrating bird species, and that the impact on these must be assessed cumulatively with other wind farms in the Baltic Sea.

*Swedish Pelagic Federation PO* points out that the planned wind farm in the German exclusive economic zone can potentially have a negative effect on fish stocks caught by Swedish fishermen through underwater noise, vibrations, changing currents, sedimentation, or electromagnetic fields around cables during the wind farm's operating phase.

Based on the received comments, Sweden hereby express the wish to participate in the upcoming EIA procedures.

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*As the decision has been made electronically there is no need for signatures.*

For the Swedish Environmental Protection Agency

Nanna Wikholm  
Head of Unit

Richard Kristoffersson  
Point of contact for the Espoo  
Convention

### **Attachments**

Comments from the Swedish Agency for Marine and Water Management  
Comments from the Swedish Meteorological and Hydrological Institute  
Comments from the Swedish Geotechnical Institute  
Comments from Geological Survey of Sweden  
Comments from the Swedish Transport Agency  
Comments from BirdLife Sverige  
Comments from Swedish Pelagic Federation PO

### **Cc**

The Ministry of Climate and Enterprise, Eleonora Rönström and Bastian Ljunggren