Länsstyrelsen
Gotlands län

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Naturvårdsverket
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Begäran om synpunkter på underrättelse enligt Esbokonventionen om gränsöverskridande miljöpåverkan från Estland gällande planer på havsbaserad vindkraftspark i Estlands ekonomiska zon kallad *Elwind*

Er beteckning: NV-03949-24

The county administrative boards remarks

The county administrative board of Gotland have been given the opportunity to share remarks in a joint missive to the country of Estonia, in accordance with the Esbos convention. This is regarding an environmental impact assessment concerning transboundary effects from an Estonian project that could cause environmental effects in Sweden, and Sweden is therefore offered to participate in the process of developing an environmental impact assessment.

The county administrative board of Gotland consider it imperative that Sweden continues to engage in the environmental impact assessment of Elwind, as the project has transboundary effects that concern our nation.

Harbour porpoise

Assessment regarding Sweden's future involvement from a harbour porpoise perspective.

The offshore wind farm project Elwind is situated within the distribution area of the Baltic Sea harbour porpoise, a critically endangered population for which Sweden bears a significant responsibility to protect and ensure favorable conservation status pursuant to the Habitats Directive (92/43/EEC). Offshore wind power development poses a threat to this population if the projects are improperly located and/or executed at inappropriate times with inadequate protective measures. Given that there are approximately 500 individuals remaining in this single population, any activities in the Baltic Sea region that overlap with the porpoise's habitat, impact

its conservation. As this population is listed in Annex I of the EU Habitats Directive, all member states are obligated to preserve the species. Therefore, it is imperative that Sweden continues to engage in the environmental impact assessment of Elwind, as the project has transboundary effects that concern our nation.

In the feasibility study pertaining to the project, it has been noted that harbour porpoises are not observed within the designated site. Referring to the SAMBAH study conducted between 2011 and 2013, it was established that the Elwind project area exhibits a low probability of detecting harbour porpoise individuals, though not entirely absent. In the absence of recent studies, it is advisable to adhere to the precautionary principle, which entails assuming that harbour porpoises inhabit the project area during their most vulnerable period. Recent observations indicate harbour porpoise activity in the southern waters of Finland during the summer months. Though improbable, it is not unwarranted to consider the presence of individuals within the project area from May 1st to October 31st.

To reduce this impact, the County administration board of Gotland suggest following mitigating measures.

- Before pile driving works commence, acoustic methods tailored for harbour porpoises should be used to deter any porpoises from the area.
- Noise-reducing protective measures equivalent to at least the attenuation provided by a double bubble curtain (DBBC) and Hydro Sound Damper (HSD) shall be employed.
- Pile driving should begin with a soft start, followed by gradually increasing the intensity of hammer strikes until full force (ramp-up) is reached.
- During the start-up of pile driving operations, passive acoustic monitoring (PAM) should be utilized, and there should be marine observers on board the vessel to lookout for porpoises.

The county administrative board of Gotland stresses the need for a pre-construction study for the presence of harbour porpoises in the area to ensure the project upholds the commitments Estonia and

Latvia has to the Habitats Directive, as it is forbidden to disturb individuals of harbour porpoises during mating and breeding.

Bird

Assessment regarding Sweden's future involvement from a bird perspective.

Like noted in the feasibility study, the suggested wind farm Elwind (Estonia 1) is located close to a Natura 2000 bird protection area that is one of the most important stopping places and feeding areas for migratory birds in Estonia and Latvia. The Irbe strait supports internationally important concentrations of several seabird species in winter, e.g., long-tailed duck, red-throated loon, black-throated loon, velvet scooter and black guillemot.

Long-tailed ducks wintering at the Swedish Natura 2000-area "Hoburgs bank och Midsjöbankarna" (with specific protection of long-tailed duck and black guillemot) are during migration likely passing the areas around the islands Hiiumaa and Saaremaa. It is hard to define national populations that winter in the Baltic Sea and breed in the Arctic, but they could all be seen as the flyway population of long-tailed duck. Marine windfarms in Estonia and Latvia as well as in Sweden have the risk of having negative direct and indirect effects on the access to important feeding areas, and thus on the population as a whole.

There needs to be further analysis regarding the possible effects on Baltic Sea seabirds in general as well as on seabirds using Swedish Natura 2000 areas such as Hoburgs bank och Midsjöbankarna specifically.

Impact on population levels from disturbance and habitat loss, collisions and barrier effects must be investigated, along with proper risk assessments and safety measures linked to oil and chemical spills from the wind turbines, as well as from expected and accidental leaks and spills from ships. Operational adjustments, for example temporarily inactivating the windfarm, to account for the largescale seasonal migrations and other adjustments to mitigate the negative impact on birds, should be described.

General remarks

Collisions and allisions from surrounding ship traffic could cause major negative environmental effects on Swedish coastlines and cause great harm to marine life in the Baltic Sea, and proper safety

protocols must be drawn up to aim to mitigate effects from potential accidents.

Cumulative effects on migrating animals, winds and currents should be thoroughly described. Multiple offshore windfarms are planned in the southern Baltic Sea and adjacent large ship traffic lanes contribute to loud underwater noise, that combined can cause severe negative impact on the environment and species in the region. It's crucial to consider and describe all activities that could affect the conservation status of species and habitats in the cumulative impact evaluation section of the environmental impact assessment.

Participants in this statement

This formal statement has been decided by the head of the Environmental and Water Unit, Stefan Persson, with the marine environment administrator Amanda Östman presenting. Environmental case officers Per-Arvid Berglund have provided valuable input to the content presented in this document.

This formal statement has been signed digitally and is therefore missing signatures.