



Richard Kristoffersson
Tel: 010-698 17 69
richard.kristoffersson
@naturvardsverket.se

2022-03-10 Ärendenr:
NV-00751-22

Federal Maritime and Hydrographic
Agency
Department O (Management of the Sea)
Bernhard-Nocht-Str. 78
20359 Hamburg

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 offshore windfarm project Windaker.

Sweden received a notification from the Bundesamt für Seeschifffahrt und Hydrographie (BSH) in Germany to participate in consultation under Article 3 of the Espoo Convention in relation to the planned offshore windfarm project Windaker.

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 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 21st of January 2022 to 11th of March.

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 brief 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:

Replies were received from *County Administrative Board of Skåne, County Administrative Board of Blekinge, The South Baltic Water District Authority, Swedish Geotechnical Institute (SGI), Swedish Pelagic Federation Producer Organization (SPF), Swedish Board of Agriculture, Swedish Transport Agency, Swedish Transport Administration, Swedish Maritime Administration (SMA), Swedish Metrological and Hydrological Institution (SMHI), Swedish Armed Forces, Swedish Agency for Marine and Water Management, BirdLife Sweden and Swedish Shipowners association.*

Swedish Board of Agriculture states that the forthcoming environmental impact assessment should include a detailed description of how cross-border fishing is affected by a possible establishment. Furthermore, a description should be made of the impact on protected stocks of species such as cod and porpoises, as well as the precautionary measures planned to minimize the negative impact. *For full statement, see attached.*

Swedish Transport Agency does not see the need to further participation but wishes to leave some general remarks. *For full statement, see attached.*

Swedish Transport Administration stress the importance of accessibility in the sea traffic routes between Sweden and Germany. The sea traffic routes are described in the Swedish Maritime Spatial Plan. Especially important to consider when assessing and making decisions concerning the location of offshore wind farms. *For full statement, see attached.*

Swedish Pelagic Federation Producer Organization points out, among other things, that the planned wind farm Windaker can potentially have a negative effect on fish stocks caught by Swedish fishermen through underwater noise, vibrations, changing currents or electromagnetic fields around cables during the wind farm's operating phase. *For full statement, see attached.*

County Administrative Board of Skåne informs that due to large amount of marine construction projects, they will not be able to participate further in the process but wishes to leave some feedback and general advice and wish to be kept informed of the project. *For full statement, see attached.*

The South Baltic Water District Authority makes an initial assessment that the German project has a minimal impact on the water district of the Southern Baltic (Skåne's coastal water bodies). Assessment of the wind farm should however take into count the goals set in accordance with the Marine Environment Directive (2008/56 / EC) and, by extension, the Water Framework Directive (2000/60 / EC) This should be clarified in, for example, Chapter B.8 in the forthcoming environmental impact statement. *For full statement, see attached.*

BirdLife Sweden stress the need to include effects on birdlife that exist and can be predicted to exist within the project area in the upcoming EIA. They also list needed protective measures to minimize the projects impact on birds. *For full statement, see attached.*

Swedish Agency for Marine and Water Management comments regarding the risk of adverse transboundary effects of the project regarding marine mammals and fish. Furthermore, the risk of negative effects on the cod population and the Baltic Proper harbour porpoise population due to cumulative impacts from multiple offshore activities in the southern Baltic Sea. *For full statement, see attached.*

County Administrative Board of Blekinge, SGI, SMA, SMHI, Swedish Armed Forces and Swedish Shipowners association replied that they had no comments.

Based on comments received during the consultation, the Swedish Environmental Protection Agency express the wish to further participate in the EIA procedure.

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

For the Swedish Environmental Protection Agency

Karolina Ardesjö-Lundén
Head of Unit

Richard Kristoffersson
Point of contact for the Espoo
Convention

Attachments

Comments from Swedish Board of Agriculture
Comments from Swedish Transport Agency
Comments from the Swedish Transport Administration
Comments from Swedish Pelagic Federation Producer Organization
Comments from County Administrative Board of Skåne
Comments from BirdLife Sweden
Comments from The South Baltic Water District Authority
Comments from the Swedish Agency for Marine and Water Management

Cc

The Ministry of Environment in Sweden, Emma Sjöberg