

Yttrande

Handläggare

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Yttrande över Esbo-samråd gällande planerad havsbaserad vindkraftpark i Polens ekonomiska zon, "Baltyk 1"

Sammanfattning

Havs- och vattenmyndigheten har beretts tillfälle att yttra sig över Miljöministeriet i Polens underrättelse om planerna för en havsbaserad vindkraftpark i Polens ekonomiska zon i sydvästra delen av Östersjön. Myndigheten lämnar här följande yttrande.

Havs- och vattenmyndighetens inställning

The Swedish Agency for Marine and Water Managements views of the Baltyk 1 offshore wind farm project

The Swedish Agency for Marine and Water Management (SwAM) would like to raise comments regarding the risk of adverse transboundary effects of the project regarding mainly harbour porpoises, but also fish and potentially cumulative impacts. Our assessment is that there is a high risk of negative effects on the Baltic Proper harbour porpoise population due to environmental impacts arising during the preinvestigation-, installation- and operational phase of the project. There is also a high risk of cumulative environmental impacts from multiple offshore activities in the southern Baltic Sea. For this reason, SwAM would like to take part in the environmental impact assessment (EIA) process.

The area of the planned project is located very close to the Swedish Natura 2000 area "Hoburgs bank och Midsjöbankarna (SE0330308). This area is of great importance for the endangered population of Baltic Proper harbour porpoise, since it is the key breeding area for the population (as is also stated in the document *Project information card*). Possible transboundary environmental impacts are identified in the *Project information card*, stating that transboundary impact of the planned wind farm cannot be excluded and that underwater noise is one potential source of transboundary impact. SwAM agrees on this.

In the 2020 Red List of Swedish Species, the Baltic Proper population of harbour porpoise is listed as Critically Endangered (CR). The most recent population abundance estimate (completed in 2011-2013) indicates that only 497 animals remain (95% confidence interval, 80–1091

animals). Since a major part of the population resides within the Swedish Exclusive Economic Zone, Sweden has a special responsibility for the conservation of this population¹.

Harbour porpoises are listed in the annex II and annex IV of the EU Species and Habitat Directive. The listing in annex IV means that a strict protection regime must be applied across their entire natural range within the EU, both within and outside Natura 2000 sites.

Harbour porpoises are very sensitive to underwater noise. The most critical phases of the project are the pre-investigation phase when seismic surveys are being conducted, and the construction phase during which animals in the area can be exposed to very high levels of underwater noise. When it comes to the operational phase, more research is needed in order to make scientifically solid conclusions on how harbour porpoises may be affected.

Due to the sensitivity of the Baltic Proper population of harbour porpoises SwAM would like to emphasize the importance of reducing potential environmental impacts of the project. There is a risk of negative transboundary environmental impacts due to underwater noise levels exceeding behavioural effect thresholds, especially during sensitive time periods of the year. Due to the low number of individuals belonging to the Baltic Proper population, negative effects on individuals could potentially effect the whole population.

Noise emissions during the construction phase will also have an impact on the fish community as fish may suffer auditory damage or die. There is also a potential negative effect due to the dispersal of sediments during construction. There is an increased risk of damage on fish communities if the construction phase coincides with sensitive time periods for fish, such as spawning. It is important that sensitive time periods for fish as well as potential migration routes for fish are identified.

As several other offshore wind farms exist or are planned in the greater area a thorough analysis of the cumulative environmental effects/implications is needed. For relevant environmental aspects the cumulative analysis should also include the effects of the offshore grid connecting the windfarms with the mainland as well as impacts due to seismic surveys. In order to avoid unnecessary cumulative environmental impacts a well-planned and coordinated construction scheme is essential. For example, there is a risk of excluding animals (marine mammals and fish) from a larger area in case of coinciding construction phases for different wind power projects. There is also a risk of coinciding with other offshore activities taking place in the area. We believe it is important to ensure that cumulative impacts are avoided as far as possible.

Beskrivning av ärendet

Det planerade projektet omfattar uppförande och drift av en havsbaserad vindkraftpark bestående av upp till 104 vindkraftverk med en total kapacitet på 1560 MW. Den kommer att inkludera upp till 2 transformatorstationer och upp till 250 km interna kraft- och telekommunikationskablar. Projektets totala yta uppskattas bli 128,53 km². Projektet kommer också att omfatta den infrastruktur som krävs för att bygga och driva vindkraftsparken. Den planerade vindkraftsparken planeras byggas i nära anslutning till svensk ekonomisk zon.

¹ SwAM. Report 2021: 11. Action plan for the harbour Porpoise.
<https://www.havochvatten.se/download/18.764c2cb917a6c5c85b03c106/1625648670494/rapport-2021-atgardsprogram-for-tumlare-v2.pdf>

Närmaste Natura 2000 område är Hoburgsbank och Midsjöbankarna (SE0330308), som gränsar med som närmast 3 km till den norra delen av projektområdet. Identifierad potentiell gränsöverskridande miljöpåverkan berör bland annat undervattensbuller under installationen av vindkraftverksfundamenten och transformatorstationerna samt påverkan på marina däggdjur och fiskar inklusive den kumulativa påverkan från andra planerade och pågående vindkraftsparker till havs i området.

Naturvårdsverket efterfrågar synpunkter kring:

- Om det finns behov av att Sverige fortsatt medverkar i miljökonsekvensbedömningen,
- Synpunkter angående miljökonsekvenser av projektet som kan beröra Sverige,
- Potentiella gränsöverskridande effekter som bör inkluderas i miljökonsekvensbeskrivningen.

Havs- och vattenmyndigheten har av Naturvårdsverket blivit ombudda att lämna synpunkterna på engelska.

Beslut om detta yttrande har fattats av avdelningschefen Johan Kling efter föredragning av utredaren Malin Hemmingsson. I den slutliga handläggningen av ärendet har även verksjuristen Fredrik T Lindgren och enhetschefen Johan Stål medverkat.



Johan Kling