Havs och Vatten myndigheten

Yttrande

Datum 2022-03-07 **Dnr** 289-2022

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Esbo-samråd gällande vindkraftsparken Windanker i Tysklands ekonomiska zon

Sammanfattning

Naturvårdsverket har lämnat Havs- och vattenmyndigheten möjlighet att inkomma med synpunkter inför planerad byggnation av en vindkraftspark nordost om Rügen. Samrådet gäller huruvida det planerade projektet kan antas medföra betydande miljökonsekvenser för Sverige och om Sverige i så fall bör delta i processen med att ta fram en miljökonsekvensbeskrivning samt att lämna synpunkter på potentiella gränsöverskridande effekter projektet kan antas medföra.

Havs- och vattenmyndighetens inställning

Havs- och vattenmyndigheten bedömer att det finns en risk att planerad vindkraftpark kan medföra gränsöverskridande miljökonsekvenser för Sverige. Orsaken är bland annat den förväntat kumulativa påverkan till följd av upprepade störningar från andra verksamheter inom och i närheten av verksamhetsområdet på framförallt tumlare och då särskilt Östersjötumlare samt torsk. Sverige bör därför delta i processen med att ta fram en miljökonsekvensbeskrivning. Nedan redogör vi för våra synpunkter på engelska, enligt önskemål från Naturvårdsverket.

Beskrivning av ärendet

Det planerade vindkraftsprojektet "Windanker" ligger i Tysklands EEZ i Östersjön cirka 38 km nordost om ön Rügen och norr om vindkraftsparken "Wikinger". Projektområdet är 25 km² stort. Den planerade vindkraftsparken omfattar 21 vindkraftsverk på en totalhöjd om ca 260 meter samt en havsbaserad transformatorplattform. Vindkraftverken kommer att grundläggas med hjälp av monopile-fundamentkonstruktioner.

Sverige har tidigare haft möjlighet att delta med synpunkter på detta projekt främst genom den strategiska miljöbedömningen gällande den preliminära undersökningen av området som sedan ledde till beslut om lämplighet, samt i miljöbedömningen av den tyska havsplanen.
Tyskland har även underrättat Sverige om en vindkraftspark i detta område i en miljöbedömningsprocess som startade 2013 och som Sverige deltog i, även då benämnd Windanker.

The Swedish Agency for Marine and Water Managements views of the Windanker 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 marine mammals and fish. There is a 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 this reason, SwAM would like to take part in the environmental impact assessment (EIA) process.

Significance of the project

SwAM recognizes the need for more renewable energy in the European energy mix and wind power is one important sources. Renewable energy is crucial for the mitigation of climate change and for the prevention of ecological impacts of ocean acidification and warming. It is however important that the development of windpower is carried out with respect to ecological values. This can be achieved through technical and time-planning solutions.

Porpoises

The area of investigation holds harbour porpoises from both the critically endangered Baltic Proper population and from the Western Baltic population. The probability of detecting individuals from the Baltic Proper population is low during the summer months. The Western Baltic population is present the whole year round.

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 transboundary environmental impacts if long term or fatal injuries on porpoises belonging to the threatened Baltic Sea population would occur. The most critical phase of the project is the construction phase during which animals in the area can be exposed to high levels of underwater noise. Pile driving should preferably be avoided or significantly reduced during time periods when it is most likely that individuals from the Baltic Proper population harbour porpoises will be present in the area. During May–October, there is a high probability of detecting Baltic Proper population harbour porpoises on and around the offshore banks south of Gotland and east of Öland. Conversely, this indicates that the probability of detection of Baltic Proper porpoises during May-October is presumably lower in the area of the Windanker project. Consequently, this period would be more appropriate for offshore activities such as piling and seismic surveys, from the perspective of protecting the endangered Baltic Sea harbour porpoise population.

Furthermore, SwAM believes that state-of-the-art mitigation measures for preventing and minimising impacts of pile-related noise during the whole construction phase should be taken into consideration as terms of condition by the permitting authority.

Fish

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.

Eastern and western Baltic cod populate the area. Both are below safe biological limits and it is therefore important to give the stocks good conditions for spawning and fry production. Activities causing negative impacts such as noise and sediment dispersal should preferably be avoided or mitigated during such sensitive time periods and restrictions should be taken into consideration as terms of condition by the permitting authority. SwAM proposes that pile driving should be avoided during peak cod spawning periods.

Cumulative impacts

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.

Marine Spatial Planning

The Swedish Marine Spatial Plans have recently been adopted by the Swedish Government. Marine Spatial planning is an ongoing process in all the neighbouring countries. Multilateral communication among planners is important for ensuring coherent plans with seamless offshore boarders (including EEZ) and for minimising cumulative disturbances. The details and procession of the current project should preferably be communicated with the responsible planning agencies within neighbouring countries, in addition to this Espoo consultation.

Beslut om detta yttrande har fattats av avdelningschefen Johan Kling efter föredragning av Emma Cederlöf. I den slutliga handläggningen av ärendet har även utredaren Malin Hemmingsson, enhetschefen Johan Stål och verksjuristen Martin Jansson medverkat.

Johan Kling