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Begäran om synpunkter enligt Esbokonventionen gällande planer för den havsbaserade vindkraftsparken Windanker inom Tysklands exklusiva ekonomiska zon.

Naturvårdverket har gett Länsstyrelsen Skåne tillfälle att yttra sig med synpunkter angående den planerade vindkraftsparken Windanker inom Tysklands exklusiva ekonomiska zon 4 kilometer från Sveriges territorium och även påvisa om Sverige behöver delta i processen för miljökonsekvensbeskrivningen.

Länsstyrelsens synpunkter

Länsstyrelsen Skåne appreciates the opportunity to leave feedback on the project and to express our view on whether Sweden should participate in an Espoo-consultation. Länsstyrelsen Skåne regrets to inform you that due to the current large amount of marine construction projects we cannot prioritize to participate in an Espoo-consultation regarding this project even though we identify transboundary effects. However, we will give some feedback and general advice. We would also like to ask to be informed of the future process of the project.

The increasing exploitation of oceanic ecosystems in the Baltic Sea is something that Länsstyrelsen Skåne observes with deep concern. For every construction project, it is important to assess not only the direct effect of that project on environment, but also the cumulative effect. This while considering different types of anthropogenic pressures (ie not only windfarms) - existing ones as well as those that are in the planning. It is also important to analyze this for a large enough area so that one can assess possible damage on a population level for relevant species.

The southern reaches of the Baltic sea, the Danish straits and Öresund are important habitats and migration routes for a wide range of fauna such as bats, birds, marine mammals, fish epi- and infauna and thus many different species. Anthropogenic activities can threaten through both local effects such as creating displacing barriers that can have negative effects on migration. Yet also have more widespread effects such as reduced connectivity which in turn leads to loss of biodiversity.

There are several offshore wind farms currently in the planning process in the southern parts of the Baltic sea, within Swedish territorial waters and EEZ as well as in neighboring waters. Länsstyrelsen Skåne wants to stress the importance of analyzing cumulative effects on the environment from all these projects in accordance. To fully understand the environmental impacts and transboundary effects of these wind farms thorough investigations needs to be implemented.

Länsstyrelsen Skåne suggests that surveys over a period of three years to capture between year variations should be carried out for fauna to establish which species might be affected by the offshore wind park. These surveys should be conducted over a large enough geographical area to allow for assessments of impact on populations and migration routes. Regarding investigations of cumulative effects from anthropogenic activities existing enterprises and planned projects needs to be considered from a range of different sectors such as shipping, fisheries, energy etcetera. Modelling can be used to assess the effects on the functional habitats for affected fauna in the area regarding different scenarios of planned projects coming to fruition.

There are several offshore wind farms in the planning for the general area. To achieve a greater quality for the surveys Länsstyrelsen Skåne encourages that different parties cooperate with their surveys and pool their resources to yield a better result. An appropriate size for the geographical area for surveys conducted for the suggested project should be from Bornholm, along the southern reaches of the Swedish coast up to Öresundsbron, then along the Danish coast reaching down to the coast of Germany.

The precautionary principle is to be applied to projects of this nature to avoid irreversible impacts on habitats and species. Therefore, measures to reduce negative consequences from the project should be proposed in those cases where they are unavoidable.

The Baltic Sea population of harbor porpoises is threatened. In the most recent report of SAMBAH, which is a study to estimate abundances of harbor porpoises, the distribution of the Baltic population is observed in the project area for the wind farm. Noise from both the construction- and the operation phase could potentially offset the Baltic population of harbor porpoises from using the area which could have a negative impact on the population. Measures to prevent or lower noise should be taken into consideration for both the construction- and operation phase. Alternative areas should also be proposed that might be more suitable in regard to environmental impacts.

The projects impact on fish and fishing needs to be assessed. What is the relative importance of this area for fishing and fisheries and what will the impacts be of displacing these activities? This area is an important habitat for spawning fish. Therefore, avoiding certain periods of the year to not disturb spawning might be suitable during the construction phase. The suggested area is an important migration route for birds and bats. Protective measure to prevent impact on their migration needs to be considered. A threatened species of bird called Long-tailed duck have been shown to use the area specifically for overwintering and migration. A Natura 2000-area situated close by in Danish territorial waters is specifically made to protect this species.

Due to the proximity to Swedish EEZ there might also be a risk for the spread of sediments to Swedish territories during the construction of the wind farm. Currents and hydrology in the project area need to be assessed to conclude whether protective measures need to be taken to prevent environmental impacts. Surveys of visual impact from the wind farm from the Swedish coast also need to be made. If the facility is deemed to be observable from the Swedish coast examples of how it will appear should be made from several relevant positions along the coast.

Carl Lindqvist – Vattenhandläggare på Vattenenheten

Detta yttrande har bekräftats digitalt varför det saknar underskrift.