

Yttrande över remiss från Naturvårdsverket gällande samrådsinbjudan från Polen enl. Esbokonventionen art.4 gällande havsbaserad vindkraft i Polens EEZ, Baltyk I

Summary

The Swedish University of Agricultural Sciences has taken part of the ESBO report on the environmental impact assessment for the offshore wind farm Baltyk I in Poland's EEZ. The planned wind farm is situated close to the Swedish Natura-2000 area "Hoburgs bank and Midsjöbankarna" (approx. 3 km closest distance). The environmental impact assessment discusses potential effects on several organism groups and species (e.g. harbor porpoise, long-tailed duck), biodiversity, fisheries, and other aspects. It was concluded that cross-border environmental effects from the planned wind farm to Sweden are expected to be minor and that there would be no risk for a negative influence on the integrity of the Natura-2000 area "Hoburgs bank and Midsjöbankarna" (p. 180).

Given the closeness of the planned wind farm to the Hoburgs bank and Midsjöbankarna Natura-2000 areas, SLU still considers further participation in the environmental impact assessment process highly relevant for Sweden. Besides careful assessment of potential effects on the environmental values of these areas, aspects of relevance for potential regional cumulative impacts of offshore wind energy expansion in the Baltic Sea need to be considered.

General aspects

According to the conservation plan of the Natura-2000 area "Hoburgs bank och Midsjöbankarna", its protection purpose is to conserve and restore local conditions for nature types and species¹ such as the critically endangered Baltic harbour porpoise, the highly endangered long-tailed duck, and black guillemot. The area is also an important nursery and foraging area for fish, including the critically

¹<https://www.lansstyrelsen.se/gotland/natur-och-landsbygd/skyddad-natur/natura-2000-omraden.html>

endangered cod. It is important that any new development in the adjacent sea will not jeopardize achieving these conservation purposes.

The fact that offshore windfarms typically create “artificial reefs”, which attract certain species of e.g. invertebrates and fish, is not mentioned among expected consequences. Biologically sensitive time periods for areal investigations and construction of the wind farm in relation to the endangered species for which “Hoburgs bank and Midsjöbankarna” was protected were not considered.

The fact that offshore windfarms typically create “artificial reefs”, which attract certain species of e.g. invertebrates and fish, was not mentioned in the expected consequences on e.g. fish and biodiversity. Time periods for investigations and construction of the wind park, that are sensitive to endangered species for which “Hoburgs bank and Midsjöbankarna” was protected, were not considered.

Specific aspects

SLU considers that evaluation of potential artificial reef effects should be included in the environmental impact assessment.

Further, SLU considers that the impact assessment should consider sensitive times of the year to avoid for areal investigations and construction, to avoid impacts on highly endangered species in the area and its vicinity. The most sensitive time for the critically endangered Baltic harbor porpoise in the area is during its reproduction period in May to October (Carlén et al., 2018). It is estimated that there are only a few hundred individuals of Baltic harbor porpoise left, of which only a part is reproductive, resulting in that the population is considered being close to extinction^{2,3}. SLU considers that substantial protective and precautionary measures are called for, given the closeness of the planned wind farm to important areas for potential reproduction, calving and feeding of Baltic harbor porpoise (Carlén et al., 2018). Avoiding areal investigations and construction during May to October, would also consider the main time period for cod spawning in surrounding areas in the Bornholm Basin (Wieland et al., 2000). Measures to avoid sediment dispersal would need to be included as a protective measure for cod spawning and recruitment, with emphasis on its egg and larval life stages.

While the time period May to October is a sensitive period for the critically endangered Baltic harbor porpoise and cod, the remaining time period between November to April is the overwintering season for the highly endangered species long-tailed duck, for which their overwintering areas in the Baltic Sea, including the concerned Natura-2000 areas, are among the most important on the global scale

²<https://www.artdatabanken.se/det-har-gor-vi/rodlistning/dagens-rodlistade-art/ostersjotumlare/>

³<https://www.havochvatten.se/arter-och-livsmiljoer/arter-och-naturtyper/tumlare.html>

(Naturvårdsverket, 2010). It is important that the environmental impact assessment considers risks for impacts on long-tailed duck, which in earlier studies has shown avoiding behaviors towards offshore wind farms (Dierschke et al., 2016).

The planned Swedish wind farm Södra Victoria is mentioned in the environmental impact assessment (e.g. pages 63-66). SLU notes that a Natura-2000 permit for that wind farm was declined by the County Administrative Board, e.g. referring to concerns for the Baltic harbor porpoise, long-tailed duck as well as the nature type reef⁴. This reflects the high concerns for protecting the areas environmental and conservation values.

Dean Torleif Härd has, with the authority of the vice-chancellor, made a decision regarding this remark after submission from coordinator Linda Ferngren. The content has been composed by researchers Birgit Koehler, Lena Bergström and Mattias Sköld at the Department of Aquatic Resources.

Torleif Härd

Linda Ferngren

⁴<https://www.lansstyrelsen.se/kalmar/om-oss/nyheter-och-press/nyheter---kalmar/2023-10-20-havsvindparken-sodra-victoria-far-inte-natura-2000-tillstand.html>