



SWEDISH
ENVIRONMENTAL
PROTECTION
AGENCY

Åsa Blomster
Phone: +46 (0) 10-698 14 51
asa.blomster
@swedishepa.se

2025-06-23

Case number
NV-25-029558

Ministry of Infrastructure and Water
Management, The Netherlands
info@platformparticipatie.nl
point-notification.espoo@rws.nl

Sweden's reply to the notification of the partial revision of the North Sea Programme 2022-2027 in the Netherlands

The Netherlands invited Sweden to participate in the consultation on the revised North Sea Programme 2022-2027. The plan is an annex to the National Water Programme 2022-2027. This is a preliminary reply from Sweden, which will be updated after 4 July as the Swedish Armed Forces has been given extended time to reply.

The consultation in Sweden

The Swedish Environmental Protection Agency (SEPA), the point of contact for the Espoo convention and the protocol, has informed and consulted authorities, non-governmental organisations and the general public about the revised North Sea Programme 2022-2027. The draft decision Partial Revision of the North Sea Programme 2022-2027 in English and a summary of the Strategic Environmental Assessment have been circulated from 20th of May until 17th of June 2025 and published on the website of SEPA.

The Swedish EPA (SEPA) is the authority responsible for fulfilling the obligations following the protocol on strategic environmental assessments (SEA) to the convention on environmental impact assessment in a transboundary context. However, the Swedish EPA has no responsibility to evaluate the consultation comments received to present an overall Swedish position.

Consultation comments received

SEPA has received statements, in Swedish, from five authorities and agencies and one organization, The Swedish Pelagic Federation PO. The documents, are available in Swedish and SEPA give a brief summary below but the statements should be read in their entirety.

The Geological survey of Sweden, the Swedish Transport Administration and the Swedish Energy Agency have no comments regarding the programme. The

Energy Agency would like to stay informed regarding the further work. These statements do not contain any additional information and are not attached.

The Swedish Meteorological and Hydrological Institute (SMHI) does not want to take part in further consultations but leave comments regarding risks of adverse impact on marine ecosystems and the water quality and the risk for transboundary potential impact on water and sediment from extraction of oil and gas, storage of carbon dioxide, offshore wind farms, marine cables, fishing, sea transports and cumulative effects. The statements must be read in full text.

The Swedish Geotechnical Institute states that there is a risk for pollution, contamination of water within Sweden's Economic Zone from establishment of platforms for offshore wind farms. There may be a risk of spreading pollutions also to the Swedish Economic Zone during the establishment of foundations as and during cable laying and sand extraction if contaminated sediments is present when the activity is carried out. The distribution of sediment takes place via transport with the Jutska stream up along the Danish coast of Jylland towards the Swedish west coast. This has been shown, among other things, for inorganic material (sand and clay fractions) and for heavy metals (see, among others, the dissertation Bengtsson, H. 2000: Transport processes in the Skagerrak and Kattegat). It is therefore important that the pollution situation is investigated, including in depth, as deeper sediments can be spread. Turbidity mitigation measures may need to be considered. See full statement attached for more information and details.

The Swedish Pelagic Federation producer's organization notes that the planned offshore wind farms can have a direct or indirect impact on the Swedish fishing industry. The organization raises issues of a lack of knowledge of the impact of offshore wind farms on the environment as a whole and on different fish species. Changing currents and mixing, chronic low-frequency underwater noise and vibration and electromagnetic fields around cables are parameters that can affect the fish among other things during migration and reproduction. Members in the organization have noted a change in the herring's migratory pattern and behaviour and reproduction has failed, see full statement for more information and details.

Conclusion

Sweden would like to follow the further process with the plan and the SEA since the plan may have a direct or indirect impact on the water quality in the Baltic Sea. The reply will be completed after 4 July 2025.

For the Swedish Environmental Protection Agency

This decision has been made digitally and therefor lacks signatures

Nanna Wikholm
Head of Unit

Åsa Blomster
Point of Contact for the Espoo Protocol

Attachment

Statement with comments from:

- Swedish Geotechnical Institute
- The Swedish Meteorological and Hydrological Institute
- The Swedish Pelagic Federation producer's organization

Copy

The Ministry of Environment, Eleonora Rönström

Espoo Point of Contact in the Netherlands