



SWEDISH
ENVIRONMENTAL
PROTECTION
AGENCY

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Federal Ministry for the
Environment, Nature
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Swedish reply to the consultation pursuant Art. 5 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) regarding the planned offshore wind farm “Windaker” in the German exclusive economic zone

The Federal Maritime and Hydrographic Agency (BSH) invited Sweden to participate in consultation on the 8th of August 2023 about the planned development and operation of the offshore wind farm Windaker, located in the exclusive economic zone of Germany.

BSH stated that OWF Windaker will consist of 21 offshore wind turbines and the cabling within the park.

Consultation in Sweden

The Swedish Environmental Protection Agency is the responsible authority for submitting and receiving notifications and otherwise fulfilling obligations for environmental impact assessments in a transboundary context (Espoo Convention) in Sweden, according to the Environmental Assessment Regulation (SFS 2017:966). The notification and the consultation documents have been circulated for consideration by SEPA to relevant agencies and organizations that previously expressed their interest in taking part of the consultation when receiving the notification on the 24th of January 2022.

The consultation period lasted from the 9th of August, 2023 until 29th of September, 2023.

Remarks received during the consultation

A summary of the statements received is included below, please note that the summary is written on behalf of the SEPA and not for the body to which the proposal is referred for consideration.

All statements are enclosed in full to this letter.

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BirdLife Sweden don't see any point in further communication, as they believe that the presented project report (IBERDROLA, Berlin, 2023-06-01) clearly indicates that their opinion is not wanted and not seriously considered.

The **Swedish Transport Administration** highlights the importance of taking maritime traffic routes and shipping conditions into consideration when establishing OWF in the region.

The **Geological Survey of Sweden's** assessment is that the planned construction works will cause considerable water turbidity/sediment spreading. As the bottom material is largely made up of young, muddy and silty sediments, the activity will result in the remobilization of the anthropogenic environmental toxins that are bound in the sediments. Furthermore, the agency believes that the possible content of environmental toxins in the sediments must be reported, and that the turbidity and sediment spreading effects caused by the construction work must also be investigated and disclosed.

The **Swedish Meteorological and Hydrological Institute (SMHI)** points out that during the construction and decommissioning of offshore wind power, there is an impact on the abiotic factors in the marine environment in the form of, among other things, turbidity. In addition to this, the effect of wind turbines on wind, waves and ocean currents must also be considered as they are not local and will affect larger areas during the whole operational phase.

As the oxygen situation in the deeper parts of the central Baltic Sea is so strained, SMHI believes that in the area from the Öresund to the eastern Bornholm Sea it is extremely important that measures affecting the hydrographic conditions are carried out in such a way that the impact is minimized.

The **Swedish Fishermen's Producer Organization** states that the situation of the herring in the various sub-areas of the Baltic Sea has been the subject of a lot of attention recently and the situation is generally worrisome. This applies not least to the Baltic Sea's western herring stock that spawns in the sea area in question. However, the reasons for this are not completely clear. Transboundary effects of the planned park may occur if the spawning and breeding of the brook trout is affected.

The **Swedish Agency for Marine and Water Management (SwAM)** continues to believe that there is a risk that construction of the planned wind farm will have significant cross-border environmental consequences for Sweden. SwAM believes that the following measures should be taken to minimize the project's cross-border environmental impact:

- To protect the Baltic Sea population of porpoises against harmful underwater noise, no construction work shall be carried out during the period 1 November to 31 March inclusive.
- To reduce physical disturbance to fish spawning and the Belt Sea population of porpoises, no clouding construction work and piling work shall be carried out during the period 1 June to 31 August inclusive.
- Coordination with other ongoing sea-based wind power projects needs to be carried out to reduce the risk of cumulative transboundary environmental impact on porpoises and fish.

The Swedish Pelagic Federation Producer Organization (SPF) believes that the impact analysis that have been presented has considerable deficiencies and that there is insufficient basis for a conclusion that the wind farm will not cause any danger to the environment. The planned wind farm Windanker can potentially have negative effects on fish stocks caught by Swedish fishermen through e.g., underwater noise and vibrations from the turbines that is transmitted into the water, affecting local and regional current patterns, increased turbidity and sedimentation and electromagnetic fields around electric cables.

This decision has been made digitally and therefore lacks signatures.

For the Swedish Environmental Protection Agency

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Point of Contact for the
Espoo Convention

Cc

The Swedish Ministry of Climate and Enterprise, Sandra Jalalian and Bastian Ljunggren

Enclosed, statements made in Swedish by:

BirdLife Sweden
The Swedish Transport Administration
The Geological Survey of Sweden
The Swedish Meteorological and Hydrological Institute
The Swedish Agency for Marine and Water Management
The Swedish Fishermen's Producer Organization
The Swedish Agency for Marine and Water Management

