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Samråd om miljökonsekvensbeskrivning för vindkraftsparken Windanker i Tysklands ekonomiska zon

Naturvårdsverket har lämnat Havs- och vattenmyndigheten möjlighet att inkomma med synpunkter på miljökonsekvensbeskrivningen och eventuellt övrigt underlag som tagits fram inför planerad byggnation av en vindkraftspark nordost om Rügen. Myndigheten lämnar här följande yttrande.

Havs- och vattenmyndighetens synpunkter

Havs- och vattenmyndigheten konstaterar att planerad anläggning endast ligger 6 km från svensk ekonomisk zon. Inom projektet planeras för 42 vindkraftsverk inom en yta av 18 km². I angränsning till detta område finns tidigare planerade vindkraftsparker Wikinger och Wikinger Nord. Sammanfattningsvis bedömer vi utifrån underlaget att det finns en risk för gränsöverskridande miljöpåverkan av projektet. Störst risk finns för påverkan på tumlare tillhörande Östersjöpopulationen. Negativ påverkan kan minimeras med hjälp av skyddsåtgärder. Nedan redogör vi för våra synpunkter på engelska, enligt önskemål från Naturvårdsverket.

The Swedish Agency for Marine and Water Managements views of the Windanker offshore wind farm project

Significance of the project

We recognize the need for more renewable energy in the European energy mix and wind power is one of the most 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 planned offshore wind park is located in an area with expected occurrence of the Baltic Sea subpopulation of harbour porpoises. This population is threatened with extinction. Animals from the western subpopulation are also found in the area. According to the acoustic studies conducted as part of the baseline study of the project, an increased occurrence of harbour porpoises was observed between July and September. This is a sensitive period for porpoise reproduction as females are nurturing their young calves. Overall the study indicated a low presence of harbour porpoises in the assessment area.

Due to the sensitivity of the Baltic Sea subpopulation of harbour porpoises we would like to emphasize the importance of reducing the potential environmental impacts of the project. We believe that there is a risk of transboundary environmental impacts if long term or fatal injuries on porpoises belonging to the threatened Baltic Sea subpopulation would occur. The critical phase of the project is the construction phase during which animals in the area will be exposed to extreme level of underwater noise, due to the planned use of monopiles.

We argue that pile driving should be avoided or significantly reduced during time periods when it is most likely that harbour porpoises will be present in the area, in this case between July and September. Furthermore we believe 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.

A binding threshold of 160 dB SEL at a distance of 750 meter from the emission source (as defined by the Federal Maritime and Hydrographic Agency in Germany, BSH) has previously been used for regulating pile-driving noise from wind power in German and Swedish waters. If this requirement is met, and combined with other measures to prevent impacts, the overall risk of hazard to porpoises can be considered to be acceptable.

We do not foresee any negative impacts on harbour porpoises during the operation phase.

Fish

Noise emissions during the construction phase will have an impact on the fish community. Fish may suffer auditory damage or die. 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.

Activities causing negative impacts (e.g. noise, sediment dispersal) on fish communities 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.

During the operational phase we expect positive local effects on fish, based on previous monitoring studies at offshore wind farms.

We are unaware of the occurrence of any Swedish fishery in the area. We take note that The Swedish Fisheries Organisation (SFR, Sveriges Fiskares Riksförbund) have been informed about the project by the Swedish Environmental Protection Agency.

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 (e.g. potential impairment of electromagnetic fields on eel migration).

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 that to ensure that cumulative impacts are avoided as far as possible.

EU Marine Strategy Framework Directive

We have not studied the German documents in detail but note that the *General Summary of Environmental Impact Study* and the *Explanatory report* don't mention the Marine Strategy Framework Directive. We lack a description of the project's environmental impacts related to the descriptors of the EU Marine Strategy Framework Directive.

Swedish Marine Spatial Planning

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 borders (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 tillförordnad avdelningschef Ann Lundström efter föredragning av utredaren Malin Hemmingsson. I ärendets handläggning har även utredaren Linus Hammar och verksjuristen Pontus Nilsson deltagit.



Ann Lundström



Malin Hemmingsson
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