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Date: 2024-10-01

Mottagare: **Naturvårdsverket**

Ärendenr.: NV-03949-24

Statement on EIA for Elwind/Estonia

The Swedish Pelagic Federation Producer Organization (SPF) represents the Swedish pelagic fishing vessels in the pelagic fishery, including the herring and sprat fishery in the Baltic Sea. Our members account for approx. 90% of the annual total fished volume in Sweden. We are grateful for the opportunity to participate in this consultation.

Cumulative effects

If the establishment of the wind farm Elwind affects pelagic fish recruitment, migration or foraging negatively, this will have potential effects on commercial fishing in a larger area surrounding the project area and fisheries from several countries including Sweden.

SPF thinks that the analysis of cumulative effects needs to have a broader regional outlook, since planning for marine wind farms is ongoing in almost all Baltic countries, and their combined effects on the environment, fish populations and fisheries needs to be taken into account, especially during the operational phase of the wind parks.

Scientific studies show that underwater noise and vibrations can affect fish behaviour and lead to avoidance behaviour. Considering the large number of wind farms that have been built or are in planning and under construction in the Baltic Sea, an analysis of the overall effects of all wind parks on pelagic fish is required. Will there still be places suitable for recruitment, rearing and foraging for Baltic herring in the future?

Description of fisheries

SPF would like to point out that the current description of the commercial fisheries includes only one year (2022). This is insufficient to reflect the interannual variations due to quota variability and other factors that affect the fisheries from year to year. A longer span of years (at least 10-15 years) needs to be included to reflect the natural variability of the fisheries.

Furthermore, the analysis is based on ship density, which is a poor measure for a fishery that is in part conducted very intensively during a few months of the year. The analysis should therefore use the real AIS/VMS data and show the trawling patterns

geographically to give a better view of how the proposed park will affect the commercial fisheries. Our assumption is that the park will be closed to all fishery with active gears (trawls and seines), and trawl patterns partly outside the proposed park may also become affected negatively by the wind park. Finally, different types of fisheries (if applicable) should be distinguished and analysed separately in the EIA.

Further studies and information needed

In section 5.2 Environmental elements impacted and studies conducted and Table 5.1 there is presented a number of studies that will be conducted within the scope of the Environmental Impact Assessment. SPF would like to point out further needs for studies and information needed. Firstly, the studies on sediment samples (no 1.2 and 1.4 in the Table 5.1) should include tests of levels of pollutants such as PCB:s, dioxins and PFAS.

Secondly, the inventory of fish stocks (no 1.5 in the Table 5.1) should include a study of how underwaters noise during the operational phase may affect herring migration and reproduction. Further, the effect of suspended sediments and potential pollutants on herring eggs and larvae need to be described if these are present in or near the project area.

Minimize potential negative effects

Finally, SPF would like to emphasize the need to minimize possible negative effects as much as possible in the further planning of Ellwind, both regarding its location, construction and operation. Construction work should be carried out during periods of the year when the potential negative impact is at its lowest on eggs, larvae and juveniles.

Moreover, mitigation measures should be carried out to minimise underwater noise during both construction and operation of the wind park.

If you have any questions related to our opinion or our fishing in the area, please contact us!

Regards,

Malin Skog

Sweden Pelagic Federation PO