

Contact information:

E-mail: annelie.rosell@pelagic.se

Phone: +46 725 808 186

Date: 2025-05-14

Recipient: Swedish Environmental Protection Agency

Dnr.: NV-01416-22

Transboundary consultation pursuant to Articles 5 of the Espoo Convention on the planned project to develop the Saare-Liivi offshore wind farm

The Swedish Pelagic Federation producer organization (SPF) represents the Swedish pelagic fishery after e.g. herring, sprat, sandeel and mackerel in the Gulf of Bothnia, the Baltic Sea, Kattegatt, Skagerrak, the North Sea and the Atlantic. Our members fish with vessels from 5-65 meters using pelagic trawls, purse seines, hooks and nets. Our members account for approx. 90% of the annual total fished volume in Sweden. We thank you for the opportunity to participate in this consultation.

Possible transboundary impacts

The planned offshore wind farm Saare-Liivi could possibly cause transboundary impacts if the construction or operation of the park cause any negative impacts on fish stocks caught by our member vessels. The summary of the EIA report states that the wind farm will not have any negative impacts on fish. At the same time, it is mentioned in section 3.4 of the report that "... the exact indirect impacts on the fish population and, consequently, on the entire marine ecosystem remain unclear". If this is the case, it is contradictory to simultaneously state with certainty that the future park will not have any transboundary effects.

Risk minimization measures

In addition to the listed risk minimization measures, relevant measures should be taken to minimize negative effects on wildlife from noise during the construction phase. In other contexts, silent startup and bubble curtains are mentioned as possible methods to reduce negative impacts during piling. We haven't understood whether vibratory

ramming and impact ramming is the same as piling and whether the aforementioned noise reduction methods are relevant in this context.

Negative impacts during the operational phase

We consider it incredibly important that animals in the area are not harmed during the construction of the park. However, we consider it at least as important that underwater noise caused by the wind turbines during the operation of the park does not risk harming our fish stocks or affect them negatively. It is stated on page 49 of the EIA report that “Current knowledge indicates that Baltic herring are likely the most vulnerable among the fish in the Baltic Sea to the potential negative effects of noise generated by offshore wind farms. Anthropogenic noise can impact fish spawning, long-term health and development, prey-predator relationships and communication (such as camouflage).”. Low-frequency noise generated by a wind farm will be permanent throughout the life of the park and it is essential that we get answers to how it is expected to affect fish living in the Baltic Sea during all life stages (spawning, foraging and migration).

It seems that the analysis of sediment dispersion only considers the construction phase. We would like to point out that sediment dispersion can also be caused by the wind turbines themselves in operation and affect the conditions for flora and fauna in the area. This phenomenon should also be considered in the EIA.

Spawning

It is positive that it has been investigated whether spawning occurs in the area. It is also positive that the EIA report states that construction work should be avoided during the months when there is a risk of disturbing fish spawning.

Monitoring programme

To increase knowledge about the effects of offshore wind farms on marine flora and fauna, SPF believes that any permit should be conditional on the establishment of a monitoring programme. The data collected should be made available to researchers and authorities in all countries participating in the Espoo consultation and considered to be affected by the planned farm.

If you have any questions related to our response or our pelagic fishery in general, please contact us!

Best regards,

Annelie Rosell

Swedish Pelagic Federation PO