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Comments regarding responses to SPF:s input submitted as part of the EIA procedure

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 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.

Underwater sound

SPF considers the response to be very insufficient. In the response given it is stated that noise from wind turbines during the operational phase doesn't affect fish behaviour significantly or cause avoidance. The response refers to research without citing any specific publications or reports or providing any facts supporting these claims. Compared to the information provided regarding expected impacts during the construction phase, the response is very limited. This topic requires an in-depth analysis and a much more developed response to fulfil the Espoo process.

Furthermore, when discussing possible effects, no distinction is made between different fish species, even though it is well known that different species have a different sensitivity and therefore will react differently to sound. SPF specifically want to know how the species fished by our members (herring and sprat) are expected to be affected during spawning, foraging and migration. These species are sensitive to and communicate with sound.

Suspended sediment

Suspension of sediment will occur during the construction phase. However, suspension of sediment may also occur and affect the environment during the operational phase of the wind farm. SPF would like to know whether water currents around the fundamentals of the wind turbines are expected to lead to an increased turbidity of the water. If this is the case, we would like to have clarity on how this is expected to affect vegetation (primary production) and fish in the area. Any negative impact on herring and sprat locally could of course affect Swedish commercial fishing, as fish move over large areas.

Impact on fish spawning

The response indicates that the results of modelling (see Annex 3 EIA) show that the levels of noise that could have a significant impact on fish spawning include the Słupsk Furrow area. The response also indicates that fish are likely to spawn in this area. To avoid negative impacts on fish reproduction, SPF considers that any permit for the construction of Baltica 1 should be conditional on piling in areas with high probability of fish spawning should only be carried out during months when there is no risk of disturbing fish spawning.

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