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**Sweden Pelagic Federation Producers’ Organisation’s and Swedish Fishermen’s PO’s points of view regarding the proposed German wind farm establishment Baltic Eagle**

Sweden Pelagic Federation Producers’ Organisation (SPF PO) represents the entire Swedish pelagic fishery in the North Sea region and the southern Baltic Sea. Our members fish for e.g. mackerel, sprat, herring and sandeel. Swedish Fishermen’s PO (SFPO) represents the Swedish demersal fisheries around the coasts of Sweden. SPF and SFPO have the following viewpoints on the proposed windmill farm establishments in the German zone:

According to the explanatory report Baltic Eagle will be located in an area where the water depths are between 41 and 45 m relative to SKN. Previous experience has shown that fishing is impossible in wind farm areas as fishing requires a lot of space. SPF and SFPO is therefore generally opposed to the establishment of wind farms in areas with a depth greater than 15 m where fishing takes place.

SPF and SFPO believes that the establishment of Baltic Eagle must be seen in a larger context. Baltic Eagle is one of many wind farms in the southern Baltic Sea that are planned, under construction or already established. Together they cover a considerable area and thus limit the areas where fishing can take place and risks having a major negative impact on this sector. In other words, the cumulative effects of the wind farms need to be assessed and our German fishing colleagues tell us that this has not yet been done. Furthermore, it is important to assess the impacts on each fishing sector separately when establishing new wind farms, as different types of fishery may be affected differently.

In section 5.11.1 in the explanatory report it is stated that “The consequences of the loss of area for fisheries due to the "Baltic Eagle" OWF are only minor, as the fishing vessels can move to neighbouring areas. Increasing offshore activities and area closures will cause more disruption to fishing in the coming decades.” It is also stated that the combined effects on the fishery sector (local increases of fish stocks, loss of fishing areas, longer steam routes) cannot be estimated at present. In other words, it is admitted that increasing offshore activities and area closures have negative effects for the fishing sector.

We also like to point out that figures of volumes and values of catches in the area concerned only relate to the German fishery. Fishing by other countries is not accounted for.

Our members have also expressed some concern regarding the electric field around the cables, and how this may affect fish and other marine organisms. In section 3.5 of the document describing cross border effects, it is noted that fish may experience disorientation due to changes in the natural magnetic field, for example, as a result of wind farm operation. Since this has not yet been scientifically proven, it is assumed in the report that cross-border-effects for migratory species does not need to be considered. We believe that this way of reasoning is strange and that it goes against the precautionary principle.

Regarding wind farms that will be constructed, we would like to point out the importance of burying the cables leading electricity from the windmills to facilities on land well into the bottom substrate to prevent any fishing gear from accidentally entangling and damaging them.

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