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[**www.sfpo.se**](http://www.sfpo.se)

Göteborg 2022-02-24

**Naturvårdsverket**

**registrator@naturvardsverket.se**

**Comments on the notification from Germany re. plans for offshore windfarm ”Windaker” in the German EEZ, in accordance with the Espoo Convention, article 3 (NV-00751-22)**

The Swedish Fishermen's PO (SFPO) represents about 250 fishing vessels active in demersal fishing. Our members fish on the terms of nature and the manager. We have members along the entire Swedish coast, from Koster to Kalix. SFPO stands for long-term sustainable fishing and our members are among the best when it comes to selectivity and quality.

Naturvårdsverket has asked for comments on the need for Sweden to participate in the environmental impact assessment process and any comments on the cross-border environmental impact consequences of the planned project.

SFPO would like to point out that we are very concerned about the transformative change that we are now facing with an explosive expansion of large-scale marine wind farms in the marine area in question. If it is filled with marine wind farms, which seem to take place in the near future, it means a significant negative change for the conditions for the marine area with the species and fauna contained therein. SFPO is deeply and seriously concerned about this development, which is reminiscent of a large-scale gigantic experiment with the entire marine ecosystem.

SFPO believes that the project can be assumed to entail significant marine environmental changes. SFPO therefore believes that Sweden should participate in the process of developing EIA.

SFPO considers that the effects of a significant increase in the number of electrical cables, together wind turbines, in the water area need to be highlighted in depth in the case of fish - particularly in the case of eels and cod. This applies both individually and cumulatively, that is to say, what does the impact of the present project mean and what does the overall impact of all similar projects mean.

The project risks bringing about significant changes in the already severely tested marine ecosy-stem and SFPO therefore considers it of the utmost importance that the negative effects of these changes are minimized as far as possible. SFPO has a legitimate concern about electromag-nettic radiation and we believe that all cables should be buried.

SFPO considers that Sweden therefore should participate in the environmental impact assessment, in particular ensuring that fish stocks in the area's interests are fully utilised (in particular eels and cod).

**SVERIGES FISKARES PO**

Peter Ronelöv Olsson Fredrik Lindberg

Chairman Ombudsman