A response to received feedback from neighbouring countries and a summary of changes in the marine spatial plans and the impact assessment

October 2024

Introduction

SwAM would like to thank all representatives who took the time to provide feedback on the amended marine spatial plans and Strategic Environmental Assessment (SEA). This feedback is a crucial step in ensuring the quality of Sweden's marine spatial plans and in continuing strong international co-operation on marine spatial planning in the future.

Several comments from the Espoo consultation highlight concerns about the lack of detail in the SEA, particularly regarding expected impacts and appropriate mitigation measures in specific energy areas. Focus of the SEA has been on the potential effects from the Swedish plan in the Swedish territorial seaand Exclusive Economic Zone, and neighbouring waters, and to highlight potential risks of cumulative effects from planned areas for offshore wind in Swedish marine spatial plan and neighbouring seas. To address outstanding issues SwAM aims to actively participate in future processes regarding marine spatial planning, energy extraction and environmental assessments.

In Sweden's current permitting system for offshore wind energy installations which can be described as an "open-door system," more detailed investigations will be conducted at a later stage in the permitting process. Currently, several applications for offshore wind farms are under review by the government. Some of these projects entirely or partially overlap with the proposed maritime spatial plans. Detailed studies and Environmental Impact Assessments (EIAs) have been or will be prepared for these projects before they are potentially granted approval by the Government. The project-specific EIAs include a detailed analysis of the impacts on aspects also covered in the SEA for Sweden's maritime spatial plans.

The marine spatial plans will inform the Government making decisions on specific wind farm projects. SwAM, along with other expert authorities and stakeholders, is involved in reviewing impact assessments related to specific projects seeking permits. It is also at this later stage in the permitting process that specific conditions can be proposed and established. This includes details such as safety distances from shipping routes, park layout that consider other interests, or specific conditions aimed at reducing negative impacts on environmental aspects.

Another recurring point in the Espoo consultation concerns the extensive amount of energy areas corresponding to a yearly production of 300 TWh. This is due to certain uncertainties within the Swedish planning process, including the stance of the Swedish Armed Forces on the proposed areas. Not all proposed energy areas will be realized. The MSP designates a level of realization of approximately 40% of the proposed areas to meet the target of 120 TWh in the government assignment.

Background

The Swedish Agency for Marine and Water Management (SwAM) is revising Sweden's national marine spatial plans based on a assignment from the Government. The focus of the assignment is to expand the opportunities for offshore energy production to 120 TWh yearly production capacity. The final proposal of the marine spatial plans will be submitted to the Swedish Government no later than December 31st, 2024. As part of this process, an Espoo notification and a consultation were conducted, during which neighbouring countries were notified about the new plan proposal and the Strategic Environmental Assessment (SEA). The Swedish Environmental Protection Agency is the national contact point for all the Espoo consultations.

The consultation for the proposals for revised marine spatial plans took place from December 28th, 2023, to February 20th, 2024. Sweden received responses and feedback from Denmark, Estonia, Finland, Germany, Latvia, Lithuania, Norway and Poland.

Since the Espoo consultation was held early in the planning process, some adjustments have been made to the plan proposal based on the comments and feedback from the Espoo consultation as well as from the national consultations. Below is a brief summary of the major changes in both the marine spatial plan (MSP) and the SEA, which may be of relevance to neighbouring countries.

Changes in the marine spatial plan

- Adjustment of proposed energy areas to fishing interest:
  SwAM has reviewed the overall impact on commercial fishing. Based on the assessment, several areas for energy extraction in the consultation proposal have been removed. The boundaries of several areas have been adjusted to better align with how and where fishing takes place. In view of the assignment's objective that the plans should facilitate more offshore energy extraction, several energy extraction areas remain where offshore wind power is not deemed able to coexist with commercial fishing. However, the total overlap area has been reduced in the review proposal to minimize the negative impact on commercial fishing.

- Adjustment and/or removal of proposed energy areas to accommodate or adjust to recreational interests, specifically the recreational values that are classified as National interests.

- Additional designation of "k-areas" that require to particular consideration to high cultural values

  A significant number of national consultation participants raised the issue that the potential impact on cultural environments needs to be more visible in the plan proposals and in the impact assessment. Under a government assignment concluded in January 2024, the coastal county administrative boards have developed planning evidence for marine cultural values of relevance to the national marine spatial planning. Based on this new data, SwAM has improved the presentation of cultural value areas in relation to the proposed energy extraction areas. Energy areas are indicated with "k" calling for particular consideration given to high cultural value within a distance of up to 35 kilometres from the shore.

- A number of energy areas have been given the status “investigation” (“utr”) to indicate that further assessment regarding impacts on birds is needed.

  Several consultation participants, both in the national and ESPOO consultation raised concerns about the impact on seabirds, foraging birds, and migratory birds due to offshore wind power. While knowledge about birds is increasing, it is still insufficient at the national level. Detailed investigations and analyses are often conducted during the planning of offshore wind power projects. If uncertainties arise, i.e., the need for more knowledge about migratory birds and the impact of offshore wind power, the energy extraction areas are marked as investigation areas (E-utr) in the review proposal. For migratory birds, the areas are indicated with particular consideration to high natural values.

- Safety distances to shipping routes are not included or represented in the Marine Spatial Plan (MSP). Areas designated for energy extraction are shown in the plans in direct proximity to shipping lanes, without defined safety distances. However, safety distances are mandatory and will be determined during subsequent permit applications. The safety distances will primarily consist of areas within the energy zone.

- Planning conditions, previously chapter seven in the plan document, is separated from the main document to a annex in a separate document:” Planning conditions”. The purpose is to have more focus on the planning, rather than the prerequisites in the main plan document.

- SwAM has expanded both the plan document and the environmental impact assessment regarding reindeer husbandry.

Changes in the Strategic environmental impact assessment (SEA)

- A new chapter (Chapter 2) has been added to the document to cover general environmental impacts and effects from offshore wind energy extraction. This change was made to avoid repetition of impacts that are already addressed in Chapters 3, 4, and 5, which focus on the Gulf of Bothnia, the Baltic Sea, and the North Sea, respectively.

- Additionally, the following sections have been introduced in Chapter 2:

- A section on impacts to reindeer husbandry.
- A section on impacts to national defence.
- A section on migrating fish, including an analysis in relevant regions.
- A section on tourism and relevant impacts.

- Impact assessment on bats is added.

- The landscape viewshed analysis from the consultation stage has been reviewed. And photo montage pictures have been developed for a hypothetic offshore wind park at different distances from the shore.

- Developed methodology, analysis and data to understand impact on industrial fishing sector.

- Introduction of scenarios to better understand potential cumulative impacts.

  According to the Swedish Environmental Code, a Strategic Environmental Assessment (SEA) must assess "realistic" outcomes of the plan. Since about 40 percent of the energy areas must be implemented to achieve the 120 TWh target set by the government, implementing all the proposed energy areas is considered somewhat "unrealistic." While the SEA includes an analysis of the impacts of all suggested energy areas individually, SwAM introduced “plan alternatives” in the draft revie version. These were further developed into “scenarios” in the final SEA to better understand potential outcomes and cumulative impacts of an actual realisation of the MSP.

- Adjustment of the “zero-alternative”

According to the Swedish Environmental Code, the zero-alternative should represent the expected state of development if the plan is not implemented. In the SEA for the MSP, the reference year is set to 2040, reflecting the time by which the MSP is expected to be fully implemented. In the previous SEA documentation, the zero-alternative only included one offshore wind park, Lilla Middelgrund (Ö287).

In the final version of the SEA, however, the zero-alternative has been expanded to include five additional energy areas: Kårehamn (a very small offshore wind farm built in 2013 near Öland), V303, V361, Ö285 (Kriegers Flak), and B146, all of which currently have permits from the Swedish government to build offshore wind farms. The rationale for this adjustment is that, since these areas already have permits, it is reasonable to assume they will be operational by 2040.

Additional studies that will contribute to the final SEA

The following studies informing the SEA were commissioned by SwAM:

- Investigation of Hydrographic effects in Swedish waters of future offshore wind power scenarios. Carried out by Swedish Metrological and hydrological institution in co-operation with SwAM. https://www.smhi.se/publikationer/publikationer/hydrographic-effects-in-swedish-waters-of-future-offshore-wind-power-scenarios-1.209985
- Updated methodology for assessing impacts from off-shore wind energy extraction on the fishing industry, including secondary effects as well as trawling patterns. The study was carried out by the AgriFood Economics Centre, part of the Swedish University of Agricultural Science (SLU).
- How shipping navigation in winter conditions might be affected by offshore wind energy areas. The study carried out by Chalmers University,
- A socio-economic impact analysis on the SEA, carried out by a consultant (WSP).

Summary and response from SwAM to feedback from neighbouring countries

1. Denmark

ID	Respondent	Comment	Response
1.1	Danish environmental agency	The SEA should include transboundary environmental impact from the realisation of the plan. For instance, how the marine environment is affected on sea basin level.	Focus of the SEA has been on the potential effects from the Swedish marine spatial plan in Swedish sea territory and EEZ and neighbouring waters, and to highlight potential risks of cumulative effects from planned areas for offshore wind in Swedish MSP and neighbouring seas. To address outstanding issues SwAM aims to actively participate in future processes regarding marine spatial planning, energy extraction and environmental assessments.
1.2	Danish environmental agency	More parameters from the MSFD than the hydrodynamic should be applied in the SEA when assessing water quality.	Potential permanent alternation of hydrographical conditions is one of the most important aspects to assess in relation to impacts on water in MSP as Offshore wind areas may have such cumulative effects.
1.3	Denmark, municipality of Bornholm	Offshore wind farms and related infrastructure, may include conditions for a net-positive impact on biodiversity and the marine environment. Furthermore, the impact on shipping lanes used by the ferries from Bornholm to Ystad and Køge needs to be considered when planning for energy extraction close to these.	SwAM agrees that this would be beneficial; however, nature-positive design options can only be regulated at a later stage of the permit application process. Regarding the consideration of shipping lanes, no energy areas are located within the lanes. However, there may be some indirect impacts on navigation.
1.4	Energistyrelsen	Wants to initiate a joint meeting between Denmark and Sweden to discuss cross-border and cumulative impact from offshore wind power development.	SwAM is open to have a meeting to discuss these issues further.

2. Estonia

ID	Respondent	Comment	Answer
2.1	Estonia, fund for Nature	In terms of impacts on birds, the Swedish MSP should foresee wind energy development only in areas where significant adverse impact is excluded. Regarding marine mammals, a concrete programme is necessary to exclude the risk of extinction of harbour porpoise in the Baltic Sea. As the Swedish MSP foresees substantial expansion of offshore wind energy, also bats have to be taken into account in the SEA. Estonia and Sweden have joined the EUROBATS agreement and thus have undertaken to follow the EUROBATS decisions and guidance (in particular, Guidelines for consideration of bats in wind farm projects, Revision 2014). In conclusion, it is necessary to amend the Swedish MSP and its impact assessment so that the significant damaging of the Baltic Sea biodiversity is excluded.	Assessment of impacts on bat populations is added in the updated version of the SEA. The analysis of impacts in the SEA is carried out on a strategic level and further investigations regarding direct impact and proper measures to reduce negative impact on harbour porpoise, bird populations and local/regional biodiversity is required before any energy areas are built.
2.2	Estonia, ministry of climate	The Estonian Environmental Board is in the position that the more important impacts and risks stemming from the implementation of the Swedish MSP that may harm the state of Estonia's environment have been mapped in the documentation. Also, the subsequent studies and necessities for impact assessments have been mapped. Taking this into account, the Estonian Environmental Board does not have additional proposals. The Transport Administration stated that in their field of activity significant transboundary impacts are not foreseen from the implementation of the Swedish MSP. The Consumer Protection and Technical Regulatory Authority informed about not having comments concerning the documentation.	SwAM takes note of the comment.

3. Finland

ID	Respondent	Comment	Response
3.1	Finnish Maritime Spatial Planning Coordination Group and Regional Council of Lapland	Stresses the importance of having cooperation across borders concerning the Gulf of Bothnia. This is seen as a prerequisite for being able to manage the combined and potential cumulative effects of offshore wind power generation, electricity transmission and storage. It is important that the respective marine spatial plans show a unified and controlled picture of the development in the Gulf of Bothnia. Especially because sea ice and its impacts are not yet known in sufficient detail.	SwAM agrees that cooperation on the expansion of offshore wind power is very important. Issues such as cross-border and cumulative environmental impacts, rate of expansion, monitoring programs and transmission cables are all important aspects that should be discussed in an international context. SwAM aims to actively participate in future bilateral or regional cooperation concerning MSP.
3.2	Finnish Maritime Spatial Planning Coordination Group	Energy recovery areas and alternative areas in the proposed maritime spatial plan have been designated close to the Finnish border or close to the border of Finland's exclusive economic zone without the so-called Maritime Exploitation Zone. Safety distance.	Sufficient safety distances will be determined in the application process for individual OWF projects. The safety distance as well as layout of turbines within the energy area will be determined based on details concerning navigation, radar and safety. The marine spatial plan does not provide guidance on safety distances at specific locations.
3.3	Finnish Maritime Spatial Planning Coordination Group	The Finnish Maritime Spatial Planning Coordination Group emphasises that dialogue during the maritime spatial planning process to designate areas close to or close to the border is of paramount importance for managing a common development picture.	SwAM agrees that more bilateral cooperation on MSP in neighbouring areas is essential for gaining common views on the development in the region.
3.4	Finnish Maritime Spatial Planning Coordination Group and Natural Resources Institute Finland (Luke)	The impact assessment needs to highlight the impact on Finnish fishing. The possible weakening of the vitality of Swedish fishing ports will also affect the livelihood of Finnish fishermen. Finnish fishery has a significantly higher catch of herring and sprat than the Swedish fishery in the Gulf of Bothnia. In recent years, most of the Baltic herring supplied by Finnish vessels to the Finnish fillet industry has been caught in the Bothnian Sea in Sweden’s exclusive economic zone around Finngrundet and Saltbanken. The proposed amendment to the Maritime Spatial Plan states that a reduction in fishing activity in wind power areas could benefit fish stocks and their recovery, for example in the Gulf of Bothnia. However, Luke points out that fishing for species fished on the high seas is regulated by annually agreed stock-specific fishing quotas. Preventing fishing in a demarcated area is likely to increase	SwAM agrees that possible changes of fishing patterns need to be considered, although it is a very complex issue.

		fishing pressure correspondingly in other neighbouring areas, thus depriving fish stocks benefits.	
3.5	Finnish Maritime Spatial Planning Coordination Group	Especially the significant fishing areas in the Bothnian Sea should be considered when identifying and delimiting suitable areas for energy production. According to current understanding, it is not possible to catch Baltic herring within offshore wind farms or in cable areas with trawl fishing vessels available in the Bothnian Sea.	Finnish fisheries in the Swedish territorial sea and the Exclusive Economic Zone have been taken into consideration the updated plan proposal. In some cases, energy extraction has been given priority.
3.6	Finnish Maritime Spatial Planning Coordination Group	Navigation In the Gulf of Bothnia, the effects of offshore wind power on winter navigation are identified as a risk that must be investigated to ensure navigability and maritime safety. Using the precautionary principle, further studies on the subject must be ensured at the latest at the project development stage.	SwAM takes note of the comment.
3.7	Finnish Maritime Spatial Planning Coordination Group	Regarding international shipping routes, safety distances to maritime routes and fairways on the Finnish side have not been considered, which are particularly important for Finland from the perspective of transport, safety, and security of supply in the business sector. Due to the ice conditions in the Bay of Bothnia in particular, maritime traffic must have enough room for manoeuvre.	Sufficient safety distances will be determined in the application process for individual OWF projects. The safety distance as well as layout of turbines within the energy area will be determined based on details concerning navigation, radar and safety. The marine spatial plan does not provide guidance on safety distances at specific locations. SwAM is also aware about the potential problems in regards to ice formation. SwAM is active in researching this further in co-operation with the Swedish maritime administration.
3.8	Finnish Maritime Spatial Planning Coordination Group and Finnish-Swedish Border River Commission	Migratory fish The impact assessment has not highlighted the impact of energy recovery areas and alternative areas on migratory fish. By migratory fish we mean wild salmon, anadromous whitefish, sea trout, eel and lamprey in the Baltic Sea. Although the Swedish maritime spatial plan proposal only starts geographically one nautical mile from the baseline, the decisions made in the sea area will have an impact on the coast and further on land.	The SEA has been updated to include a section on impacts on migratory fish from offshore wind power.
3.9	Finnish Maritime Spatial Planning Coordination Group and	For the time being, there is too little research data on the effects of the electromagnetic field on migratory fish to assess the effects. In accordance with the precautionary principle, renewable energy at sea must be promoted in a controlled manner, in cooperation with Finland and other Baltic Sea	The SEA has been updated to include a section on impacts on migratory fish from offshore wind power.

	Finnish-Swedish Border River Commission and Council of Oulu Region and The Ministry of the Environment	countries. The effects and combined effects of cables on the cabling of other offshore wind farms on the behaviour of migratory fish should be investigated before large-scale development of offshore wind power areas	SwAM agrees that this is an important issue for future investigations.
3.10	Finnish Maritime Spatial Planning Coordination Group and Regional Council of Lapland	Consider the combined and cumulative effects of offshore wind power and power transmission. Possible negative impacts on migratory fish, and especially on salmon in the Torne River, may weaken the operating conditions of fishing tourism and thus have significant negative regional economic (and cultural) impacts in the entire Torne River area for both countries	The SEA has been updated to include a section on impacts on migratory fish from offshore wind power.
3.11	Finnish Maritime Spatial Planning Coordination Group	Marine mammals So far, there is no research evidence on the effects of offshore wind power construction and operation on ice formation and formation, and thus on the nesting conditions of the Baltic ringed seal, so when developing energy production in the Bay of Bothnia, it is advisable to follow the precautionary principle when developing operations.	Potential energy areas in the most northern part of the Bay of Bothnia have been reduced in size since the Espoo consultation and the designation “n” has been added to the area B111 calling for particular consideration to the ringed seal.
3.12	Finnish Maritime Spatial Planning Coordination Group and Southwest Finland Centre for Economic Development, Transport, and the Environment and Natural Resources Institute Finland (Luke) and Metsähallitus and Lapland ELY Centre	It is a good idea to cooperate so that the potential and cumulative impact on birds that can come from offshore wind power is considered from a transnational perspective. Especially considering how difficult it is to predict the type of synergies that can arise based on the available data and state of knowledge.	SwAM agrees that this is an important issue for future cooperation.
3.13	Finnish Transport Infrastructure Agency and Ministry of Transport and Communications	When adding new areas designated for offshore wind power to the maritime spatial plan, the overall impact of areas designated for offshore wind power on shipping must be considered, also taking shipping into account separately during the ice-covered period. In addition, the combined impact of the Swedish and Finnish maritime spatial	Sufficient safety distances will be determined in the application process for individual OWF projects. The safety distance as well as layout of turbines within the energy area will be determined based on details concerning

	and Finnish Transport and Communications Agency (Traficom)	plans and the wind farm projects planned for their exclusive economic zones on shipping in the Gulf of Bothnia must be considered.	navigation, radar and safety. The marine spatial plan does not provide guidance on safety distances at specific locations. SwAM is also aware about the potential problems in regards to ice formation. SwAM is active in researching this further in co-operation with the Swedish maritime administration.
3.14	Southwest Finland Centre for Economic Development, Transport, and the Environment and The Centre for Economic Development, Transport and the Environment of Southwest Finland Fisheries Authority	The energy production areas included in the Swedish maritime spatial plan are strongly concentrated northeast of Gotland, the southern and central parts of the Bothnian Sea and the northern parts of the Bay of Bothnia, slowing down and redirecting wind in areas of thousands of square kilometres. If realized, these areas will potentially affect the flow conditions and stratification of the sea areas in question, and further the distribution of temperatures, oxygen content and nutrients at different depths. Considering the prevailing wind directions, it is possible, that the environmental impacts of the planned wind power concentrations will particularly affect Finland's domestic and territorial waters and the coast, causing blue-green algae blooms and extensive changes in environmental and biological communities, for example. The Centre for Economic Development, Transport and the Environment of Southwest Finland emphasises the importance of assessing synergies from the perspective of the entire marine ecosystem.	SwAM agrees that these issues need further investigation considering large scale off shore wind exploitation. As a first step SwAM initiated a study mentioned earlier in this document: Investigation of Hydrographic effects in Swedish waters of future offshore wind power scenarios.
3.15	Centre for Economic Development, Transport, and the Environment of Southwest Finland Fisheries Authority	Trawl fishing is not possible in offshore wind energy areas with current trawling technology and wind power construction practices. From Finland's point of view, the fishing areas in the Swedish maritime spatial plan are too small and the most important areas for catching edible fish are completely missing.	SwAM takes note of the comment. Fisheries have been taken into consideration when designating and delimiting areas for energy extraction (offshore wind). The areas in the MSP designated for fishing, or ”yrkesfiske” are based on claims of national interest for commercial fishing in accordance with the Swedish Environmental Code Several areas for energy extraction have been excluded or have had adjusted delimitations due the fisheries the plan proposal since the Espoo-consultation.
3.16	Centre for Economic Development, Transport, and the Environment of	We are particularly concerned about the impact of export cables on salmon, Baltic whitefish, and eel migration. The most favourable time window for these species to migrate is small in northern conditions, and the cumulative slowing effect of	The SEA has been updated to include a section on impacts on migratory fish from off shore wind power.

	Southwest Finland Fisheries Authority	the magnetic fields of cables can be fatal for these endangered species	SwAM agrees that this is an important issue for future investigations.
3.17	Centre for Economic Development, Transport, and the Environment of Southwest Finland Fisheries Authority	Fishing should always be marked as an activity to be considered in the energy production areas of the Bothnian Sea (särskilt hänsyn) so that those planning can take fishing into account at an early stage. The Fisheries Authority also hopes that the fishing activities of Finnish vessels will be mentioned directly alongside those of Swedish vessels and in a way that expresses its importance, so that planners are not left with the impression that Finnish fishing in the area is irrelevant, as in the current version of the maritime spatial plan	Planning has taken fishing interests, including activities by Finnish vessels into account in the planning of energy extraction areas. The activities by Finnish vessels are also mentioned in the plan Harmonized presentation of neighbouring countries fishery in Swedish waters is an important topic for future cooperation. .
3.18	Centre for Economic Development, Transport, and the Environment of Southwest Finland Fisheries Authority	Directing export cables to dedicated corridors could also reduce the impact on trawl fishing and migratory fish	The information is noted. Detailed information on cable routes will be determined in a later stage of the development process for specific projects.
3.19	Uusimaa Centre for Economic Development, Transport, and the Environment	More detailed planning impact assessments should address collision mitigation measures, such as repellents or flight barrier lights	SwAM takes note of the comment
3.20	Uusimaa Centre for Economic Development, Transport, and the Environment	Areas Ö205 and Ö219 are elongated in a west-east direction, thus forming a wide barrier to the main migratory directions of birds. Their barrier effects on bird populations would be smaller if the areas were narrower in relation to the main migration directions, as is the case, for example, with similar areas around Gotland.	The analysis of impacts in the SEA is carried out on a strategic level and further investigations regarding direct impact and proper measures to reduce negative impact on bird populations is required before any energy areas are built.
3.21	Uusimaa Centre for Economic Development, Transport, and the Environment	Energy zone Ö298 in the Öresund has a risk of major impacts on migratory bird populations and should therefore be replaced by an alternative energy zone such as Ö285, Ö286 or Ö288. The alternative areas Ö273, Ö277, Ö501 and Ö509 are the most harmful to migratory bird populations, so their implementation would require particularly careful planning and consideration of feasibility to reduce risks.	In the current review version of the plan, the energy area Ö298 is removed. Mitigation measures for other energy areas which may affect migrating birds will be decided at the permitting stage for offshore wind projects.
3.22	Finnish-Swedish Border River Commission	Notes that cooperation with Sweden and other Baltic Sea countries in the overall impact assessment is very important … The Commission proposes that strategic work should ensure that there is no excessive haste in the construction of offshore wind energy until a comprehensive impact assessment is possible and that irreversible damage to migratory fish is not caused.	SwAM agrees on the need for bilateral cooperation.

3.23	Council of Oulu Region	More offshore wind power projects have been launched in Finland's territorial waters and exclusive economic zone than has been considered in the impact assessment. … It would be of paramount importance to consider the project situation of offshore wind power and in particular, the overall impacts on nature and shipping in the entire Bay of Bothnia region.	The SEA included offshore wind in the Finnish MSP. SwAM is interested in having a dialogue on what may be a realistic implementation of offshore wind in our shared sea basins.
3.24	Metsähallitus	The priorities of different uses in the areas and the solution of the choice have been clarified, but the mutual weighting of different interests and how one interest takes precedence over another is sometimes difficult to grasp.	SwAM takes note of the comment. The plan proposals have been revised in order to clarify the reasons for proposed planning solutions.
3.25	Metsähallitus	Metsähallitus asks why high nature values are not so well considered in general use areas, even though they have often been identified?	Certain criteria have to be met for areas to be designated as n-areas, including verified nature values.
3.26	Metsähallitus	A shortcoming of maritime spatial plans is still that they do not cover areas close to the coast, which makes it difficult to assess the interconnectedness, continuum and overall impact of different functions and values on the sea area.	The marine spatial plan is presented according to its legal delimitations. Shipping routes to neighbouring countries, are however shown in the map (without any legal implication) to facilitate understanding of the interconnectedness.
3.27	Metsähallitus	In connection with the needs of shipping, it has been pointed out that further studies are needed on the impact of offshore wind power on ice conditions. Metsähallitus believes that this is also needed to understand the impacts on the ice ecosystem, as many organisms, including the Baltic ringed seal, are dependent on ice conditions	SwAM agrees that more studies are needed on these topics, and the authority aims to be proactive in terms of generating and supporting research regarding the specific impacts from OWF in this region.
3.28	Metsähallitus	Metsähallitus considers that changes in stratification may have significant effects in an ecosystem such as the Baltic Sea, where stratification regulates several key processes in the open sea. More attention should be paid to investigating these impacts in connection with wind power construction.	SwAM shares the opinion that these issues need further investigation considering large scale off shore wind expansion. As a first step SwAM initiated a study mentioned earlier in this document: Investigation of Hydrographic effects in Swedish waters of future offshore wind power scenarios.
3.29	Metsähallitus	The impact assessment mentions that "in some environments" the introduction of a new artificial seabed platform can have positive effects on the marine environment. In its previous statement on the Swedish maritime spatial plan, Metsähallitus has emphasised that there is, however, very little information on the functionality and impact of artificial new reef environments on biodiversity in the Baltic Sea region, and it may also vary due to the different characteristics of the different sub-	SwAM agrees that the potential for artificial reefs of benefit for the marine environment varies between different sea basins.

		basins of the Baltic Sea, so the matter should be better investigated as a basis for decision-making	
3.30	Metsähallitus	The station map of the maritime spatial plan area of the Gulf of Bothnia also includes connections outside the maritime spatial plan concerning electricity transmission and shipping. The station map of the maritime spatial plan area in the southern part of the Bothnian Sea shows two electricity transmission lines (submarine cables) that run from the exclusive economic zone all the way to the coast of Finland. On the Finnish coast, submarine cables run according to plan through the Bothnian Sea National Park, which is managed by Metsähallitus. At this point, Metsähallitus wishes to inform the attention that the conservation provisions of the Nature Conservation Act do not allow the installation of electricity transmission cables in the national park area in Finland.	The information is noted. Detailed information about cable routes will be determined in a later stage of the development process for specific projects. The differences between the Swedish and Finnish marine spatial plans regarding how specific cables are presented relates to the degree of generalization.
3.31	Metsähallitus	In the southern part of the Bay of Bothnia there are two areas designated for energy recovery (B107, 108) and three alternative clearing areas (B137, 138, 139). All of these have been identified as high natural values, and the study areas are also reef environments. The endangerment of natural values in connection with wind power construction is evident in these relatively low-lying areas, and Metsähallitus recommends examining whether energy areas in the southern part of the Bay of Bothnia could be located further away from the coast in deeper areas (G136).	Significant reductions have been used in number and size of these areas in the plan proposal that will be delivered to Government.
3.32	Metsähallitus	There is only one smaller area in the Bay of Bothnia, the most suitable use of which is nature (B103). The area is surrounded by areas of wider public use (B102, 104 and 109), but high natural values (Gn and Gfn) have been identified. Metsähallitus recommends examining whether nature could be designated as the primary use of the areas in such cases.	The Swedish approach to include nature as N-areas in MSP is based on current marine protected areas and national interest areas for nature. Additional designations have so far not been included. MSP has however potential to include n-areas calling for particular consideration to high nature values as part of a green infrastructure network.
3.33	Metsähallitus	Metsähallitus considers that wind power planning should be avoided in the Kvarken region B120	There is no energy area in the area B120.
3.34	Metsähallitus	In the alternative area of the open sea (B161), it is good to consider possible wind power projects on the Finnish side	The authority sees a significant need for international cooperation regarding the expansion of offshore wind power. Issues such as cross-border and cumulative environmental impacts, rate of expansion, monitoring programs, and collaboration on transmission cables are all important aspects that should be discussed in an international context. SwAM aims

			to actively participate in future international cooperation concerning marine spatial planning.
3.35	Metsähallitus	In general, all areas designated for energy production in the Kvarken Strait are estimated to be at risk of major adverse impacts on bird populations, which is why Metsähallitus recommends considering the suitability of these areas for energy production	Reductions have been made both in number and size of the coastal energy areas in Northern Kvarken.
3.36	Metsähallitus	Metsähallitus points out that many of the areas defined for energy recovery have high and identified natural values (B142, B146, B149 and B152) and encourages further exploration of areas B146 and B158, which are in the middle of the sea area and further away from shallow areas with significant nature values, as alternatives to these	SwAM takes note of the comment.
3.37	Metsähallitus	Natural values have been commonly identified in the coastal periphery of the area and often clash with the interests of national defence. However, two of the energy recovery areas to be investigated (Ö205, Ö279) carry a medium risk of negative impacts on birds. Metsähallitus recommends that natural values be considered especially in the exercise activities carried out in the area, that the impacts on bird populations in risk areas be investigated and that the suitability of the areas for energy production be considered	SwAM takes note of the comment.
3.38	Sea Lapland Development Centre	Require that plans made for Swedish territorial waters and land use targets must not impair Finland's ability to build wind power in its own territorial waters or affect the use of national parks. Cumulative risks must be considered when assessing future wind power projects in connection with territorial water boundaries	Questions related to potential reductions in wind resources will need to be addressed during the permitting process. Given Sweden’s open-door system, not all proposed areas will ultimately be developed
3.39	Ministry of Transport and Communications	When delimiting the area of planned offshore wind power projects, it is important to consider the traffic routes used by shipping also outside the reinforced fairways and routing systems, so that the operating conditions and safety of shipping are taken into account in the planned project area. Special attention shall be paid to routes used by winter navigation that differ from those used in open waters	Sufficient safety distances will be determined in the application process for individual OWF projects. The safety distance as well as layout of turbines within the energy area will be determined based on details concerning navigation, radar and safety. The marine spatial plan does not provide guidance on safety distances at specific locations. SwAM is also aware about the potential problems in regards to ice formation. SwAM is active in researching this further in co-operation with the Swedish maritime administration.
3.40	Ministry of Transport and Communications	In addition, wind turbines have an impact on the field strength and signal quality of mobile networks. The operation of radio links operating in the sea area also requires a completely	This issue is beyond the scope of MSP process, however the issues related to radio links and navigation safety will be

		unobstructed area between the transmitter and receiver. Since electronic communications services in coastal and maritime areas depend on radio systems, it is important to ensure that mobile services, radars, and radio links operate sufficiently undisturbed, including in maritime areas. Even small changes in the placement of wind turbines can have a decisive impact on the operation of radio systems in an area	investigated in the permit process for individual energy projects.
3.41	Finnish Transport and Communications Agency (Traficom)	Traficom points out that if offshore wind power areas designated near the boundaries of Sweden's exclusive economic zone also considered maritime traffic on the Finnish side and the planned offshore wind power areas, the green colour on the document's map, indicating a minor impact, could well change to a greater adverse impact if the perspective were broadened to include the entire sea area.	SwAM takes note of the comment.
3.42	Finnish Transport and Communications Agency (Traficom)	The reliable operation of radar and radio systems is an essential part of maintaining maritime and public safety. Effects of wind turbines on radars, radio navigation equipment, etc. The operation of radio equipment important for shipping and traffic control should be considered and investigated.	This issue is beyond the scope of MSP process, however the issues related to radio links and navigation safety will be investigated in the permit process for individual energy projects.
3.43	Natural Resources Institute Finland (Luke)	The proposed amendment to the Maritime Spatial Plan states that a reduction in fishing activity in wind power areas could benefit fish stocks and their recovery, for example in the Gulf of Bothnia. However, Luke points out that fishing for species fished on the high seas is regulated by annually agreed stock-specific fishing quotas. Preventing fishing in a demarcated area is likely to increase fishing pressure correspondingly in other neighbouring areas, thus depriving fish stocks of benefits	The potential benefit of reduced local pressure from fisheries relates mainly to bottom trawling.
3.44	Natural Resources Institute Finland (Luke)	Important to consider the combined effects of wind power projects (and other similar construction projects), increasing shipping and the changing climate when planning operations. However, the impact assessment of seals and the possibilities for mitigating the damage are presented somewhat superficially in the proposed amendment. In practice, the proposal does not indicate how the effects and, the combined effects of wind farm construction will be taken into account and what can be done to avoid or reduce them in the areas proposed for energy production	Mitigation of measures is decided at the licensing stage of offshore wind projects.
3.45	Natural Resources Institute Finland (Luke)	With regard to seals, it is particularly important to consider the combined effects of wind turbine construction, winter shipping and weakened ice conditions (due to climate change), for example, on uniform ice cover. This would require a more comprehensive analysis of long-term risks and impacts of land use. The territorial delimitation of	SwAM takes note of the comment.

		this assessment should be meaningful for the species, i.e. it should include the seal habitats as a whole, not just seal areas on the Swedish side.	
3.46	Regional Council of Lapland	The maritime spatial plan and its impact assessment concern only the energy production areas themselves. When the plan envisages a significant increase in offshore wind: The power transmission options, and their effects must also be highlighted in the plan. This is especially important in the Bay of Bothnia region, where the distance between energy areas and the coast is quite short in several directions. There may also be potential energy users on both the Finnish and Swedish sides. Power transmission solutions in energy projects of this magnitude are significant seabed and land users, and their environmental impacts are still poorly understood. Power transmission lines can have an impact on, for example, migratory fish. The effects may therefore be cross-border effects	The SEA is updated and includes a section on potential impacts of off shore wind power developments on migratory fish.
3.47	Regional Council of Lapland	In the energy areas of the Bay of Bothnia, a safe distance to the fairways leading to the ports of Kemi and Tornio must be considered. Safety distances must be considered in the energy areas of Malur and Farstugrunden. Transport routes are extremely important from the viewpoint of traffic, safety, and security of supply, for example. Due to the ice conditions in the Bay of Bothnia, there must be plenty of room for manoeuvre for maritime traffic	Sufficient safety distances will be determined in the application process for individual OWF projects. The safety distance as well as layout of turbines within the energy area will be determined based on details concerning navigation, radar and safety. The marine spatial plan does not provide guidance on safety distances at specific locations.
3.48	Lapland ELY Centre	The biggest shortcoming of Sweden's amended maritime spatial plan regarding environmental impact assessment is the lack of an assessment of the combined effects of offshore wind power areas planned for different sea areas and regions of different states	Focus of the SEA has been on the potential effects from the Swedish plan in Swedish and neighbouring waters, and to highlight potential risks of cumulative effects from planned areas for offshore wind in Swedish and neighbouring seas. To address outstanding issues SwAM aims to actively participate in future processes regarding marine spatial planning, energy extraction and environmental assessments.
3.49	Lapland ELY Centre	The impact assessment report has not examined the potential impacts of the planned offshore wind farms on the feeding grounds and migration routes of migratory fish, such as Baltic salmon and sea trout	The SEA is updated and includes a section on potential impacts of off shore wind power developments on migratory fish.
3.50	Lapland ELY Centre	In the fisheries impact assessment, particular attention should be paid to the combined effects of planned projects, including those planned on the Finnish side, as potential adverse cumulative effects may not be reflected in the EIA procedures for individual projects. Based on the results, the	SwAM is open for discussions on cumulative effects from offshore wind on Swedish and Finnish fisheries.

		necessary updates to maritime spatial plans could be made.	
3.51	The Finnish Meteorological Institute	the plans for the construction of offshore wind power weaken the possibilities to monitor the state of the Baltic Sea using traditional methods (observations from ships, automatic measuring devices), and therefore the strategy should consider how the state of the Baltic Sea will be monitored in the future.	The wind turbines in the anticipated offshore wind areas are expected to be 2 km apart (depending on the height of turbines). Traditional monitoring may likely still be possible but MSP may still call for a general review of monitoring methods, areas and frequencies.
3.52	The Finnish Meteorological Institute	The production of renewable energy (e.g., offshore wind power) and bottom resources (e.g. sand extraction) have an impact on the environment locally, but possibly also more widely. Especially in areas with deep currents, special attention should be paid to the fact that their changes may have an impact on the oxygen balance at the bottom over a much larger area. Such an area is especially Södra Midsjöbankken	SwAM takes note of the comment.
3.53	The Finnish Meteorological Institute	When planning wind farms for areas, attention should also be paid to the changes they cause in wind conditions and, on the other hand, the ramifications of these changes on waves, currents and thus ecosystems	SwAM has funded a project carried out by SMHI on the risk of cumulative effects on hydrographical conditions due to offshore wind.
3.54	The Finnish Meteorological Institute	When considering the impacts of proposed areas, it is necessary to take sufficient account of impacts on marine status in addition to direct impacts on ecosystems. The Finnish Meteorological Institute also notes that large wind farms located close to each other may have combined effects on the wind field, which may not result in the expected energy production volumes.	Questions related to potential reductions in wind resources will need to be addressed during the permitting process. Given Sweden's open-door system, not all proposed areas will ultimately be developed.
3.55	The Ministry of the Environment	Åland is responsible for maritime spatial planning in its own territorial waters. Large offshore wind power projects are underway in Åland, and it is necessary to include Åland in maritime spatial planning cooperation between Finland and Sweden.	SwAM aims at including Åland in our MSP dialogue with Finland.
3.56	The Ministry of the Environment	The Ministry of the Environment considers it a shortcoming that marine management is not considered in the plans (the state assessment of Phase I of the Marine Strategy Framework Directive, or the reports on the Habitats Directive). Similarly, references to, for example, a possible future EU Restoration Regulation are incomplete and references to multinational agreements could be more comprehensive, for example. for underwater noise.	SwAM is developing the integration between MSP and marine management. Uncertainty on which areas that may be involved in future MPA-network development and marine restoration makes integration in MSP challenging.
3.57	The Ministry of the Environment	The areas used by birds and migration routes could be handled better and bats should also be considered, especially in the Kvarken and Åland regions	An assessment of impacts for bat population is added in the revised SEA.

3.58	The Ministry of the Environment	Fish and fish spawning: It would have been good to discuss here the effects of magnetic fields on migratory fish. Especially if there are many of them and there is a need for further investigation, especially in the Gulf of Bothnia	The SEA is updated and includes a section on potential impacts of off shore wind power developments on migratory fish
3.59	The Ministry of the Environment	The migration routes of bats, and birds, are presented ambiguously. Helcom has an expert working group on bird migration routes (EG BirdMove). In addition, BirdLife Finland has published a publication related to bird migration routes	SwAM is aware of EG BirdMove but the group has yet to deliver maps on bird migration. SwAM would like to take part of the publication by BirdLife Finland on bird migration routes as such data are lacking.
3.60	The Ministry of the Environment	2.1.1. Effects on protected animal and plant species and biodiversity The bat survey has been carried out on the Finnish side, especially the north of Åland. Possible cooperation with Sweden would be important in this study.	The SEA of the review stage includes an assessment of potential negative effects on bats carried out by Johnny de Jong at the Swedish University of Agricultural Sciences.
3.61	The Ministry of the Environment	Climate change is one of the biggest threats to the Baltic ringed seal, which is dependent on ice conditions during the breeding season. With regard to the cumulative effects, it should be investigated in particular what consequences the construction of wind turbines will have on winter navigation and possible changes in shipping lanes, and thus on the ice conditions suitable for the Baltic ringed seal, i.e. the number of calving areas, especially in the Bay of Bothnia area	The effect of wind turbines on ice conditions is a potential threat for the ringed seal especially in the northern Bay of Bothnia. Further knowledge is needed.
3.62	The Ministry of the Environment	In the Kvarken and Bothnian Bay areas, special attention should be paid to the potential breeding areas of grayling (Thymallus thymallus), especially on the Finnish side, and to the effects of potential wind power areas in question to those areas Cooperation between the Finnish and Swedish authorities is needed, especially since Finland promotes the recovery of grayling as part of the EU's Life IP Biodiversity project https://www.metsa.fi/sv/projekt/biodiversea-sve	SwAM is open to take part of Finnish information related to MSP and grayling.
3.63	The Ministry of the Environment	3. Impact assessment of the Baltic Sea Spatial Plan At this point, it remains somewhat unclear how the assessment of the state of marine management has been utilised and whether the state-related issues described in the maritime spatial plan are in harmony with the assessment of the state of marine management, only whether there are contradictions between the two. This applies to Chapter 3 as a whole	The baseline description of the current state of the environment is in harmony with the HELCOM assessment of the status of the Baltic Sea. The SEA presents potential risks of how energy areas may cause negative environmental impacts.
3.64	The Ministry of the Environment	It is also unclear how the maritime spatial plan relates to HELCOM's State of the Baltic Sea assessment. Are the issues presented contradictory or in harmony with HELCOM's assessment of the state?	The baseline description of the current state of the environment is in harmony with the HELCOM assessment of the status of the Baltic Sea. The SEA presents potential risks of how energy areas

			may cause negative environmental impacts.
3.65	The Ministry of the Environment	Consideration should be given to adding not only a good marine environment but also the protection of biodiversity as one of the objectives. In addition, one could also consider whether "rich fauna and flora" really describes diverse nature	Overall objective for the plans: • "Contribute to a good marine environment and sustainable development" In addition, a number of more specific objectives are included among others: "Creating conditions for: • Marine green infrastructure and the promotion of ecosystem services."
3.66	The Ministry of the Environment	Building the capacity to establish sustainable aquaculture in the future -> Since Finland also wants to promote sustainable aquaculture, how does this fit e.g. to the objectives of the marine management/marine strategy, which aims to reduce eutrophication pressure on the Baltic Sea? This seems to contradict the objectives of good marine status. If all Baltic Sea countries plan to increase aquaculture in the sea, the cumulative effects should be considered.	This is beyond the scope of the Swedish MSP. The current plan proposal does not include designation of areas for aquaculture.
3.67	The Ministry of the Environment	p.46 -> B104 Are sandbanks present in the area (Habitats Directive), as in the Bothnian Bay area on the Finnish side?	Needs to be investigated.
3.68	The Ministry of the Environment	p.49 -> Should the benthic fauna (white and sea shrimp bottoms) also be investigated? Could make use of Helcom's species information sheets. Regional table concerning the northern part of the Bothnian Sea and the Kvarken Strait	SwAM look forward to discuss linkages between MSP and nature conservation with Finland.
3.69	The Ministry of the Environment	p.52-> B120 > should probably take into account, for example, on the Finnish side the Kvarken N2000 area and seal protection area (Snipansgrund-Medelkallan) as well as possible breeding areas for grayling (CR). As part of the Life IP Biodiversity project, the Whale Islands area is carrying out grayling recovery measures, including spawning grounds. Finland would be happy to discuss these issues	SwAM looks forward to discuss linkages between MSP and nature conservation with Finland.
3.70	The Ministry of the Environment	p.54 -> It is not clear here whether the planned electricity transmission network will also be on the Finnish side, for which the matter must of course be considered together with Finland, taking into account the natural values on the Finnish side, such as. N2000 areas and the Bothnian Sea National Park (protection of underwater nature).	The specific cable route will be determined in the permit process of individual energy projects.
3.71	The Ministry of the Environment	p.82-85 -> An important area for both the porpoise population and the pools in the Baltic Sea. It is necessary to remain in its natural state as much as possible and in accordance with the precautionary	In the review version of the marine spatial plans the energy area Ö255 has been removed Mitigation measures will be decided during the licensing stage for projects.

		principle to avoid all activities that are harmful to natural values. In particular areas: Ö255 and Ö273.	
3.72	The Government of Åland	The Government of Åland wishes to reiterate the importance of having forums that deal with the use of marine areas in a comprehensive, holistic manner. It is important to the maritime spatial planning process brings together stakeholders and contributes to coordination between all those actors with an interest in the use of marine areas	SwAM agrees with this statement and has an ambition to participate in international collaboration regarding MSP and associated issues.
3.73	The Government of Åland	the Government of Åland has reacted to the fact that the description at the end of Chapter 6 of the cross-border effects, including the account of cumulative effects, is brief. … It would be desirable to have an account or summary of the studies that have been carried out or are planned of cumulative effects in the sea areas shared by Sweden and Finland, including the Åland Islands. It is also desirable to discuss knowledge gaps	The description of cumulative effects has been developed in the updated version of SEA, but SwAM shares the opinion that these issues require further investigations and international co-operation.
3.74	The Government of Åland	The Government of Åland has reacted to the fact that the Convention on the Protection of the Marine Environment of the Baltic Sea, the Helsinki Convention, is not mentioned in Figure 2.1-1 on page 23.	SwAM takes note of the comment.
3.75	The Government of Åland	The site tables clearly indicate the priority uses and the special consideration to be taken into account in the different sub-areas shown on the maps. However, what the Government of Åland lacks is more detailed criteria and justifications that form the basis for uses and special considerations. The site tables provide justifications for preference and adaptation to coexistence, but not for the other two categories. At the recent bilateral meeting between Sweden and Finland, including the Åland Islands, the possibility of organising meetings for the exchange of knowledge on the methods used in the impact assessment was discussed	How mitigation measures are to be designed is something that will be addressed at a later stage in the permitting processes. Descriptions of potential mitigation measures have been developed in both the marine spatial planning document and the Strategic Environmental Assessment since the Espoo consultation
3.76	The Government of Åland	the Government of Åland notes that mining and extraction of materials from the seabed other than sand is not a use included in the maritime spatial plan. The Government of Åland is of the opinion that such use should be included and discussed in the maritime spatial plan	There is a section on mining in the annex (previously part 7) on planning conditions.
3.77	The Finnish Fishermen's Association And The Federation of Finnish Fisheries Associations	The association fully supports the statement Swedish Pelagic Federation Producer Organisation (SPF) submitted to the Swedish Agency for Marine and Water Management in December 2023 regarding amended marine spatial plans. The SPF's opinion takes a detailed position on how fish and fishing are affected by offshore wind power, and we see the matter in the same way	Comment noted.

3.78	The Finnish Fishermen's Association	we are concerned about the combined effects of the Swedish and Finnish wind power projects. In permit processes, the authorities do not consider the combined impact of all projects under planning. We believe that there is a need for more coordination and analysis of the combined impact of offshore wind power projects in Sweden and Finland. In addition to possible production areas, this also applies to cable routing to land and, in the future, also possible piping (for hydrogen).	SwAM supports further discussions between Sweden and Finland on cumulative assessments of impacts on fisheries.
3.79	The Finnish Fishermen's Association	It is also essential that the procedures of the Espoo Convention are followed. For example, in the case of Eystrasalt Offshore (County Administrative Board of Gävleborg, request for an opinion as of 26.1.2024), it is evident that the Swedish authorities have not sent information to the Finnish authorities	Issues related to management of offshore wind project applications and their Espoo-processes should be addressed to the Swedish Espoo- contact point at the Swedish Environmental Protection Agency.
3.80	The Finnish Fishermen's Association	Several successive wind farms may disrupt salmon migration in the sea and delay migration to spawning rivers. If salmon spawning migration is delayed, it can have significant consequences for salmon stocks in the long term. A possible delay in migration will also affect fishing in relation to the current fishing time regulation. If wind farms control salmon migration along new routes, it will also have consequences for coastal fishing along the current salmon migration route. Other migratory fish may also be affected	SwAM has funded an overview of the current knowledge on potential effects on migrating salmon from SLU but is also aware the further knowledge development, in a joint Finnish-Swedish context is needed.
3.81	The Finnish Fishermen's Association	Changing currents and mixing, chronic low-frequency underwater sounds and vibrations, and electromagnetic fiedd2lds around coiled cables can all affect fish, including fish migration behaviour. Different fish species can react differently, and each species' unique biology needs to be taken into account. These are areas where a lot of knowledge is still lacking.	SwAM has funded an overview of the current knowledge on potential effects on migrating salmon from SLU but is also aware the further knowledge development, in a joint Finnish-Swedish context is needed.
3.82	The Federation of Finnish Fisheries Associations	It is also important that the authorities apply the principles of compensation for damage to fish stocks and fisheries, in the same way as apply to other industrial activities. In terms of fishing, Finnish and Swedish trawl fisheries are in a vulnerable position, if extensive no-go zones are created around the wind farms	Financial compensation is beyond the scope of Swedish marine spatial planning.
3.83	The Kvarken Council EGTC	In view of these infrastructure issues, joint planning of the Kvarken region's marine areas should be coordinated between Sweden and Finland, and a joint study should be carried out on the Kvarken fixed connection. With its long experience of cross-border cooperation, the Kvarken Council is happy to assist in this co-ordination and investigation	We take note of the comment. We encourage initiatives for more cooperation on regional planning. As for a fixed connection across Kvarken there is currently no national Swedish planning.
3.84	Åbo Academi University	the plan is now biased, as it does not take into account e.g. the need for increased areal nature protection, recreational boating or fisheries (see	The SEA delivered to Government will include indications of how recreational boating may be affected. Fisheries is considered in

		Lappalainen et al. 2023; https://jukuri.luke.fi/handle/10024/554030).	the planning. Development of the marine protected areas network, including Natura 2000 areas, are parallel processes which may affect future revisions of the Swedish MSP.
3.85	Åbo Academi University	The areas (and alternative areas) proposed for energy production seem to be placed where no major overlaps with other uses are apparent, and if clashes occur, that is clearly marked in the plan. This, however, questions what the criteria for selecting these areas were and if they are based on the best available information. Further, proposed places for the energy transport (underwater cables) are not accounted for in the plan.	The first step of the current revision of the Swedish MSP aiming at including energy areas with 120 TWh yearly energy production capacity was led by the Energy authority starting with criteria identifying a gross list of areas with potential for offshore wind production. During the continuation of the process including the MSP-process considerations have been taken to other interests in order to find areas where the energy target may be met with as few as possible of negative effects on other interests.
3.86	Åbo Academi University	Environmental impacts will be assessed for each area that a park is planned for, however, there are no clear plans for how the cumulative impacts (both nationally and cross-border) will be assessed. This is brought up in the plan, but only stated as "has to be considered" and will be a large challenge in the near future	In the final version of the SEA, we have introduced the concept of "Assessment Scenarios" as a means to visualize the potential cumulative impacts of (OWF development. The extent to which cumulative impacts will be investigated in later stages of the planning process is somewhat uncertain, making it a crucial issue to monitor from a national marine spatial planning perspective
3.87	Åbo Academi University	Some effects of potential energy production on fish and birds have been assessed, but e.g. migratory routes and how they have been considered have not been included.	Potential negative effects on migratory birds are included in the SEA as well as an assessment of risk of negative effects on migratory salmon.
3.88	Åbo Academi University	The planning tool Symphony has been used to identify areas with high nature values. Many of the proposed areas for energy production have been placed in deeper areas. Is there enough knowledge on the ecology and nature values of the deeper sea floor to account for in the model?	More detailed investigations will be carried out in a later stage of the development process in specific energy areas.
3.89	Åbo Academi University	The marine environment in offshore areas is still somewhat unknown, and a higher emphasis on the realisation of nature protection in the plan (14% of the sea protected in Sweden, with the goal of 30% protected by 2030) would be necessary. The ecosystem approach should be implemented, and different sectors should be treated equally	Development of the marine protected areas network, including Natura 2000 areas, are parallel processes which may affect future revisions of the Swedish MSP.

3.90	An opinion from a private person	in order to ensure the future, environmentally friendly establishment of offshore wind power, it should be possible to prevent temporary disturbances during the construction phase and to provide a 'window' for construction work, primarily by significantly tightening up the environmental requirements for existing discharges, and especially on the Finnish side of the Bothnian Sea, where industry has had too 'free a hand' polluting the environment and for too long	SwAM takes note of the comment
3.91	An opinion from a private person	utmost importance that the interests of the various actors are linked, steered, and coordinated in good cooperation with the authorities and the public in Åland, Sweden and Finland at the earliest possible stage.	SwAM takes note of the comment.
	The Finnish Environment Institute (research institute)	believes that it is important that the methods used to assess the impacts of the Marine Spatial Plan are the same, or at least comparable, between Sweden, Åland and Finland. To achieve this, there must be sufficient relations between the three regions, through informal and formal forums for discussion and information exchange. It would be desirable to have a forum that addresses the use of marine areas for energy production in a holistic way, so that synergies can arise between development of offshore wind farm areas and other uses of the sea area.	SwAM agrees that harmonization with regard to assessment methods as well as potential joint assessment from a sea basin perspective is valuable and that continued cooperation between Sweden, Finland and Åland is needed.

4. Germany

ID	Respondent	Comment	Response
4.1	Bundesamt für Seeshiffart und Hydrographie (BSH)	With regard to document „Scoping consultation for strategic environmental assessment of revised marine spatial plans in Sweden “, chapter 4: „Relationship with plans, programmes and other relevant processes“ we would like to ask for consideration of spatial designations and regulations of the German Maritime Spatial Plan for the EEZ (2021) as well as the revised Site Development Plan (2023)	German Maritime Spatial Plan for the EEZ (2021) as well as the revised Site Development Plan (2023) have been considered when relevant in relation to the Swedish plan.
4.2	Bundesamt für Seeshiffart und Hydrographie (BSH)	We would further appreciate if your considerations would acknowledge transboundary spatial functions and activities and their coherence in these plans, for the German sea area adjacent to „havsområde Sydvästra Östersjön och Öresund“of your first MSP from 2022, such as • safeguarding international major and minor sea routes shared by Denmark, Sweden and Germany in this part of the Baltic Sea and the sea are south of Skane • transboundary military training areas, specifically NATO areas Bravo 2, 3 and 4 • cable / pipelines connections and gates at the EEZ border DE – SE • areas for offshore wind energy production • the corridor for migratory birds on the route Skane – Rügen, which has to be considered in Germany when licencing offshore wind turbines in this area, with mitigating measures to be taken in case of mass migration events.	The bird migration corridor Skåne-Rügen has been added in the Swedish MSP.
4.3	Bundesamt für Seeshiffart und Hydrographie (BSH)	There may possibly be shadowing effects from Swedish wind farms that can affect offshore wind power in Germany, and I welcome further research on this. It must be ensured that if Swedish and German wind farms are located in the immediate vicinity of each other, for example at Kriegers Flak, a sufficient distance between the wind turbines	SwAM shares the view that more research om shadowing effects is welcome. We’re positive to bilateral cooperation in general, but any cooperation needs to take the Swedish and German planning- and permitting system into consideration.

		in one wind farm and the neighbouring wind farm must be maintained to guarantee the stability of the facilities. I therefore ask for early and extensive participation on all levels, from planning to approval, and I wish to promote a close bilateral cooperation regarding the technical level.	
4.4	Bundesamt für Seeshiffart und Hydrographie (BSH)	The development plan (FEP) 2023 includes international connections. For example there is 1 GW available capacity in the cable system OS-2-4. We propose an exchange on possible network connection for future updates of marine spatial plans	SwAM takes note of the information and proposal for future collaboration. Svenska Kraftnät is the responsible authority for cable transmission connections.
4.5	Bundesamt für Seeshiffart und Hydrographie (BSH)	The statements in the Espoo document on transboundary impacts on birds, fish and marine mammals are generally very vague	Focus of the SEA has been on the potential effects from the Swedish plan in Swedish and neighbouring waters, and to highlight potential risks of cumulative effects from planned areas for offshore wind in Swedish and neighbouring seas. To address outstanding issues SwAM aims to actively participate in future processes regarding marine spatial planning, energy extraction and environmental assessments.
4.6	Bundesamt für Seeshiffart und Hydrographie (BSH)	In order to be able to assess possible cross-border effects, it is necessary to extend the survey to German Natura 2000 areas. In addition, it is unclear in the document which possible combinations of proposals and alternative areas are to be implemented. This means that more detailed information is needed to be able to make a full assessment of how the project may affect bird life across national borders.	The objective of the Governmental assignment is to provide planning conditions for 120 TWh yearly electricity production. Due to a number of uncertainties regarding potentially conflicting sea uses, the proposed MSP includes offshore wind areas corresponding to about 330 TWh yearly electricity production. To reach 120 TWh in yearly production approximately 40 percent of the total planned area for offshore wind needs to be developed. Not all energy areas will be implemented but it is uncertain which will be. The SEA of the consultation proposal of the plan hence covers the potential impact of all energy areas in the plan. But this is a challenge from an impact assessment perspective.
4.7	Bundesamt für Seeshiffart und Hydrographie (BSH)	For the areas around Midsjöbank (Ö255, Ö273, Ö261), which directly border an important reproduction area for the central population of marine mammals in the Baltic Sea,	In the national review consultation of the plan proposals SwAM proposed that Ö255 and Ö261 be removed. Detailed requirements for mitigation measures will be set at the projects licensing stage.

		it must be ensured that no significant negative effects occur, especially during different time periods. For the Baltic porpoise the summer months are specially important.	
4.8	Bundesamt für Seeshiffart und Hydrographie (BSH)	An assessment of possible transboundary effects on the fish stock in the German exclusive economic zone (AWZ) is missing.	No significant negative effects on fish stocks in the German EEZ are deemed likely.
4.9	Bundesamt für Seeshiffart und Hydrographie (BSH)	In the southern Baltic Sea, an investigation area for energy extraction (Ö285) and an alternative investigation area for energy extraction (Ö286) are planned near the border of the German Exclusive Economic Zone (EEZ). Regarding the protection area for land/sediment, no statements have been made about potential effects, including cumulative or transboundary effects. Due to the vague description of the planning within the relevant investigation areas, no statements can be made about transboundary effects on land as well as cultural and material assets. Further specifications are required for this.	More detailed investigations will be carried out in a later stage in the development stage.
4.10	Bundesamt für Seeshiffart und Hydrographie (BSH)	A discussion took place (20 December 2023) on the partial inclusion of provisions from the German Sea Plan for the Exclusive Economic Zone in the Baltic Sea regarding the bird migration corridor in n-areas. We would welcome a further bilateral exchange on this	The plan proposal to Swedish Government includes considerations to the bird migration corridor in the German MSP, supporting coherence between neighbouring countries MSP.
4.11	Landesfischereiverband Schleswig-Holstein	Through the increasing demarcations of areas associated with the general expansion of wind energy in the marine environments, the available fishing areas are cumulatively increasingly limited. The fishing vessels concentrate in fewer and fewer fishing areas. This will have significant socio-economic consequences for the companies, which will only be partially compensated.	A study has been undertaken evaluating potential effect on the fishery sector.
4.12	Landesfischereiverband Schleswig-Holstein	More attention should be paid to environmental protection and water pollution during construction and the subsequent operation.	SwAM takes note of the comment.

4.13	Landesfischereiverband Schleswig-Holstein	In order to take the interests of fishing companies perspective, a Co-existence concept should be implemented. This would allow fishing companies to continue their operations also within offshore windfarms. Possible forms of use include aquaculture facilities as well as passive fishing within the wind farms and active fishing within the safety zones. The passage for fishing boats must in any case be ensured so that the fishermen can reach their fishing grounds and harbours in the shortest possible way.	Passive fishery is likely not to be regulated in Swedish offshore wind areas apart from minimum distance to the physical installations.
4.14	Deutscher Segler-Verband	No comments.	
4.15	Staatliches Amt für Landwirtschaft und Umwelt Vorpommern	In order to ensure ecological coherence a comprehensive site overview at the Natura 2000 network level should be considered. Therefore, especially EU bird protection areas in German coastal waters (e.g., DE 1542-401 Vorpommersche Boddellandschaf and northern Strelasund) should be investigated for possible impact during further planning	Development of the marine protected areas network, including Natura 2000 areas, are parallel processes which may affect future revisions of the Swedish MSP.
4.16	Staatliches Amt für Landwirtschaft und Umwelt Vorpommern	The Rügen-Skåne corridor is one of the most important migration routes in Europe	SwAM takes note of the comment.
4.17	Staatliches Amt für Landwirtschaft und Umwelt Vorpommern	Especially in the alternative proposed energy areas, which are located in the middle of narrow passages or partly within the wide migration corridor of the southern and central Baltic Sea or near the coast (e.g., Ö286), the risk of negative effects on migratory birds, resident birds and breeding birds, even within The Rüge-Skåne corridor, seems to be high. From the documents it is not clear to which extent an assessment of further alternative areas has been carried out. However, the planned project's impacts on the bird species that occur in this area must be assessed at the latest in connection with the permit procedure, and the collision risks for migratory birds (but also bats) with offshore wind turbines must be taken into account. Parameters	The plan proposal includes the designation "n" calling for particular consideration to high nature values for the migration corridor between Skåne and Rügen. The Swedish plan proposals highlights in similar terms as the German MSP that certain mitigation measures are likely needed to avoid negative effects on migrating birds.

		for deriving the collision risk, e.g., flight altitudes, migration times (day/night), facility visibility and species-specific behaviour (e.g., avoidance, coping with certain weather conditions), should be integrated.	
4.18	Staatliches Amt für Landwirtschaft und Umwelt Vorpommern	The Swedish Marine Spatial Plan for the Baltic Sea does not consider potential effect on bats. This ought to be considered in the same way as has been done regarding migratory birds in the continued planning process.	The SEA of the review stage includes an assessment of potential negative effects on bats.
4.19	Staatliches Amt für Landwirtschaft und Umwelt Vorpommern	Only by applying appropriate noise reduction measures (according to current technology) and exclusion of simultaneous ongoing piling (coordination of construction activities) upon the construction of offshore wind turbines can significant disturbances to porpoises, even in German coastal waters, be avoided	Detailed requirements for mitigation measures will be set at the offshore wind projects licensing stage.
4.20	Staatliches Amt für Landwirtschaft und Umwelt Vorpommern	The assessment of cumulative effects ought to be considered (especially the effects on marine mammals, bats and migratory and resident birds ought to be investigated thoroughly). Permit processes regarding offshore windfarms, in particular in the south and southwest of the Baltic Sea, in German coastal waters, like “EnBW Baltic 1” (in operation), “Arcidas Ost 1” (in operation) and “Gennaker” (permit process) ought to be considered cumulatively. (Especially regarding the preservation of the Rügen-Skåne-corridor for bird migration)	Focus of the SEA has been on the potential effects from the Swedish plan in Swedish and neighbouring waters, and to highlight potential risks of cumulative effects from planned areas for offshore wind in Swedish and neighbouring seas. To address outstanding issues SwAM aims to actively participate in future processes regarding marine spatial planning, energy extraction and environmental assessments.
4.21	Staatliches Amt für Landwirtschaft und Umwelt Vorpommern	Further participation is desired in the continued planning regarding shipping and possible changes in shipping routes and how possible transboundary effects could affect German waters	Sweden is active in the Helcom-Vasab MSP working group and information on the Swedish MSP-process is continuously communicated there. Germany will additionally be informed of future changes to the Swedish MSP through the national Espoo contact point.
4.22	Bundesamt für Naturschutz	Requests detailed information regarding what sort of measures to avoid and mitigate environmental impact are planned if the mentioned areas (Ö282, Ö286 and Ö288) for energy production are expanded, as well as the possibility	The plan proposal does not anticipate any expansion of these energy areas. The plan avoids to include specific mitigation measures but the placement of turbines as well as regulation to shut down production during migration events are relevant mitigation measures.

		to participate in the process if an expansion of these areas becomes relevant	
4.23	Bundesamt für Naturschutz	Recommends that the interests of (transboundary) bird migration be taken into account in the development of marine spatial plans and in the context of the strategic environmental assessment. The areas between Germany and Sweden that are important for bird migration should be kept free from offshore wind farms (Ö285, Ö283 and Ö282). According to BfN's assessment, this can be sufficiently justified with the current knowledge of bird migration across the Baltic Sea. *Attached to this comment SwAM also received information on migrating birds, such as cranes.*	The plan proposal includes the designation "n" calling for particular consideration to high nature values for the migration corridor between Skåne and Rügen. The Swedish plan proposals highlights in similar terms as the German MSP that certain mitigation measures are likely needed to avoid negative effects on migrating birds.
4.24	Bundesamt für Naturschutz	points out that an investigation of the planned areas with regard to threats to the bat population should definitely be carried out.	The SEA of the review stage includes an assessment of potential negative effects on bats.
4.25	Bundesamt für Naturschutz	Are in favour of the designation of the area Ö254 as a nature reserve, but recommend a reconsideration of the immediately adjacent areas for energy production. Noise emissions (especially construction-related noise during piling) reaching the breeding areas can have a negative impact on the porpoise's reproduction. BfN agrees with SEA's assessment that the development of the nearby areas for the production of alternative energy could potentially have a large negative impact on the porpoise in the Baltic Sea. BfN recommends that potential development should only be planned to take place outside the porpoise's breeding season to minimize negative impact on the endangered population. The BfN also recommends that the porpoise's migration corridors to and from the reproduction area are kept free. Cumulative effects should also be taken into account when planning and building areas. A temporal concentration of piling ought to be avoided.	In the national review consultation of the plan proposals SwAM proposed that Ö255 and Ö261 be removed. Detailed requirements for mitigation measures will be set at the projects licensing stage.

Latvia

ID	Respondent	Comment	Response
5.1	The Ministry of Defence of the Republic of Latvia	Implementation of the MSP will not have a direct negative impact on the defence interests of the Republic of Latvia	SwAM takes note of the comment.
5.2	The Ministry of Health of the Republic of Latvia & Health Inspectorate	Implementation of the MSP does not have a direct and obvious impact on public health of Latvia; therefore, the Ministry of Health of the Republic of Latvia has no questions to clarify performed assessment, nor comments on the results of the SEA of the Baltic Sea part of the MSP	SwAM takes note of the comment.
5.3	The Ministry of Transport of the Republic of Latvia & Maritime Administration of Latvia	The only issue that could have a direct impact on the state of environmental and economic exploitation in the Baltic Sea in and in close proximity to the Latvian economic exclusive zone in the future is the requirements for carbon storage (claims for carbon storage) mentioned in all border areas, where, when looking at the information on the Geological Survey of Sweden (SGU) website (https://www.sgu.se/en/physicalplanning/carbon-capture-and-storage-ccs/), largest possible carbon storage sites are located in close proximity to the Latvian economic exclusive zone. However, whether and what impact that potential storage would have should be assessed by environmental experts	SwAM takes note of the comment. Currently there are no designated areas for carbon storage.
5.4	The Nature Conservation Agency	According to the results of the SEA, the proposed energy area Ö266 is located in the vicinity of cod spawning sites south-east of Gotland. It will have an average impact on the Baltic Sea harbour porpoise population and will cause financial losses for commercial fishing. According to the Nature Conservation Agency, that area should be excluded as a wind energy production area to avoid the foreseeable impact of the Baltic Sea porpoise population, which periodically are detected into the territorial waters of the Republic of Latvia. For birds, it will have a minor impact on migratory birds and is not expected to have a negative impact on birds` wintering grounds. According to the Nature Conservation Agency, an appropriate SEA has been carried out for the MSP of the Baltic Sea, with no significant transboundary impact indicated in general, apart from the proposed energy area Ö266, which the Nature Conservation Agency encourages not to use for that purpose in order not to produce effects which could potentially also have transboundary impacts. The Nature Conservation Agency has no other objections to the results of	The Swedish assessment indicates that there is a risk of negative impact on harbour porpoise in Ö266 In the national review consultation of the plan proposals SwAM proposed that ÖÖ266 be included. The potential negative effects on harbour porpoise during construction are considered to be reduced to acceptable levels with appropriate mitigation. Consideration should also be taken to minimize potential negative effects in the potential spawning area for cod. However, findings show that this area may be of reduced importance.

		the SEA the Baltic Sea part of the MSP, including other aspects of transboundary impacts.	
5.5	The Kurzeme Planning Region	After evaluation of the MSP and its SEA, the Kurzeme Planning Region has no additional comments on the results of the SEA of the MSP for the Baltic Sea part, on aspects of the transboundary impacts and on other parts of the MSP	SwAM takes note of the comment.
5.6	Environment state Bureau	We kindly ask you to send us information mentioned in the Article 9 of the Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment and Article 11 of the Protocol on strategic environmental assessment to the Convention on environmental impact assessment in a transboundary context when the MSP is adopted to conclude the process of the transboundary consultations. The Bureau would like to express willingness to continue commenced successful cooperation in the field of the strategic environmental assessment in the transboundary context	We highly appreciate the willingness to continue our cooperation on in the field strategic environmental assessment in the transboundary and regional context. As for the comment on providing the information stated in article 9 of the SEA Directive and in article 11 of the SEA Protocol, we refer to the Swedish government being the mandated body for the adoption of the national marine spatial plans. All ESPOO consultation statement will be forwarded to the Government as part of the reporting of proposals for revised MSP: s.

5. Lithuania

ID	Respondent	Comment	Response
6.1	The ministry of environment of the republic of Lithuania	Due to recent structural changes in our ministry, we were unable to share the plan proposal and SEA with all our responsible institutions. We understand the significance of the matter, and we will ensure that the consultation is shared with all the responsible institutions of the country in the near future. We will inform you additionally once we receive any comments. Furthermore, we would like to express our interest in participating in the SEA-procedure. We are committed to providing our input and expertise to support the Swedish Environmental Protection Agency's efforts to enhance the environmental sustainability of marine spatial plans in Sweden.	Comment noted. SwAM is looking forward to co-operate further on the topic of marine spatial planning and strategic environment assessment.
6.2	The ministry of environment of the republic of Lithuania	Information about the bordering regions of chemical weapons and former area of mines which are located by the border of the Swedish Exclusive Economic Zone and are identified in the Comprehensive Plan of the Territory of the Republic of Lithuania. The graphical information is presented in the supplemented document.	We appreciate receiving the information regarding chemical weapons and area of mines.

6. Norway

ID	Respondent	Comment	Answer
7.1	Norges miljödirektorat	NVE emphasizes the importance of assessing the overall load for migratory species in the years going forward, given Northern Europe's ambitious plans for energy development. We want to underline the need for good pre- and post-investigations, so the environmental effects and any cross-border effects can be assessed in tandem with the development plans for renewable energy at sea.	This is an important matter and the assessments made in the SEA is on a general level. Further assessments are required in the Swedish process before permits are given for energy extraction.
7.2	Norges kystverk	The plan will not affect important shipping routes in Skagerrak negatively. It is important that shipping traffic is considered in terms of need for space for safe navigation.	SwAM takes note of the comment.
7.3	Norge Forsvarsbygg	National defence and security is not considered in the SEA.	The final version of the SEA includes a general discussion regarding impacts for the Swedish national defence. However, more detailed insights regarding impacts from the proposed energy extraction areas is needed before permits are official.
7.4	Norge Forsvarsbygg	The Norweigan defence do not consider the closest energy area (Mareld) to be an issue, as long as the turbines have warning light signals to avoid collisions with air crafts.	The Swedish Agency for transportation is responsible for regulations regarding warning lights. If more information is required on this matter there is a report that explains differences between the Swedish regulation and international regulations (https://www.transportstyrelsen.se/globalassets/global/publikationer-och-rapporter/luftfart/behovsstyrd-hinderbelysning-for-vindkraftverk.pdf)
	Norge Forsvarsbygg	Regarding Impact Assessment for Mareld, Floating Wind Farm in Skagerrak We assume that the wind farm will be equipped with obstacle lighting in accordance with regulations, to ensure safety in relation to aviation. We do not foresee that the planned floating offshore wind farm in Skagerrak will have any consequences for the Armed Forces' area usage interests, but we still wish to raise some questions/topics regarding issues that may be relevant for such developments. We request that the following be addressed: (see below)	SwAM wishes to inform the Norwegian Ministry of Defence that the suggested energy area, which was partly overlapping with the project Mareld in the first consultation round, has been removed from the marine spatial plan proposal. The County Administrative Board of Västra Götaland has recommended that the Swedish government issue a permit for the specific Mareld project. Regardless of whether any area overlapping the Mareld project will be included in the final marine spatial plans or not, SwAM is addressing these questions in a general sense, the answers are applicable to other potential and suggested energy areas. All off shore wind farms in Sweden are equipped with warning signals in accordance with Swedish regulations. In addition, all OWF projects will hold individual Espoo consultation in there is relevance in regards to cross-border environmental impact.

			As for coexistence between the Swedish Armed Forces and wind energy we refer to the report ”Möjligheter till samexistens mellan Försvarmaktens verksamhet och utbyggd vindkraft,” available at https://www.foi.se/rapportsammanfattning?reportNo=FOI-R--5293--SE
7.5	Norge Forsvarsbygg	What type of control do we have regarding electronic devises on the turbines?	The question of electronic devices is beyond the scope of the marine spatial plans.
7.6	Norge Forsvarsbygg	What influence does the Swedish state have regarding ownership of wind parks, are all states allowed to own and operate off shore windfarms in Swedish waters?	The question of ownership is beyond the scope of the marine spatial plans. The Swedish government recently adopted legislation regarding foreign investments in critical infrastructure, including **Law (2023:560)** and **Regulation (2023:624)**.
7.7	Norge Forsvarsbygg	Will the Swedish state be able to shut the wind turbines off if in a scenario where that would be necessary**?**	This level of details regarding operations of certain wind farms is beyond the scope of the marine spatial plans. The Swedish government has the authority to impose specific terms and conditions in permits for offshore wind operations in the Exclusive Economic Zone. In three permits for offshore wind there are conditions relating to passing birds and/or bats where the operator needs to turn off the operation of the wind turbine blades.

7. Poland

ID	Respondent	Comment	Response
8.1	Republic of Poland	The Polish party would like to request information on whether wind farms, located in areas proposed by the Amended Plan, will be subject to an environmental impact assessment at the stage of issuing an investment permit, including in a transboundary context, in accordance with the Espoo Convention and the Directive 2011/92/EU of the European Parliament and of the Council of 13 December 2011 on the assessment of the effects of certain public and private projects on the environment (OJ L 26, 28.1.2012, p. 1–21, as amended)	More detailed investigations and environmental impacts assessments will be carried out as part of the permit application process. Espoo notifications and consultations will be carried out according to international and national regulations.
8.2	Republic of Poland	Transboundary consultations in the form of an intergovernmental experts meeting. The Polish side proposes to divide the meeting into two parts, within a two-day meeting. The purpose of the meeting would be to discuss potentially significant transboundary impacts of the provisions of the Amended Plan and measures to minimise these impacts. In this context, a particularly important issue is the assessment of the cumulative impact of the provisions of the Amended Plan, with the existing provisions of the maritime spatial plans of Poland and other neighbouring countries, on migratory organisms, including birds, marine mammals and fish. Issues relating to the consistency of marine plans and proposed changes in marine land use should also be the subject of consultation.	SwAM suggests an initial mutual online meeting in November 2024 to discuss the issues raised by Poland. It is our hope that the Polish side and all concerned parties can attend this meeting. The process of co-operating on issues related to MSP, offshore wind farm expansion, and cumulative transboundary impacts is a long-term commitment in which SwAM aims to actively participate in the coming years.
8.3	General Directorate for Environmental Protection (GDEP)	GDEP raises concern regarding Natura 2000 site Hoburgs bank och Midsjöbankarna SE0330308 (Ö254) that is of significant importance from the point of view of nature conservation in Polish marine areas, especially in the context of two species: the harbour porpoise (Phocoena phocoena) and the long-tailed duck (Clangula hyemalis).	Comment noted. SwAM is aware of the area's high natural value and its significance for the mentioned species.
8.4	GDEP	Questions whether proposed minimisation measures in the form of using bubble curtains and adjusting the timing of wind farm construction to the biological cycle of this species concerning the harbour porpoise are sufficient. The impact assessment should also consider the migration routes of the harbour porpoise and the cumulative effects if several wind farms will be built simultaneously.	The SEA includes examples of mitigation measures, but specific requirements are set in the permitting process.

8.5	GDEP	The Natura 2000 site is the most important wintering site for the long-tailed duck in the Baltic Sea. Requests additional information regarding minimising measures for birds, e.g., free passage corridors for migrating birds. To exclude negative impacts from proposed wind farms (in particular: Ö255, Ö269, Ö256) on birds of conservation interest in the Polish marine Natura 2000 sites, the most up-to-date data on migration routes of birds, in particular the long-tailed duck, should be submitted. The possibility of cumulative impacts with Polish projected wind farms in the Baltic Sea should also be considered	In the national review consultation of the plan proposals SwAM proposed that Ö255 should be removed. Sweden is anticipating to use the maps on migrating birds that the HELCOM EG Birdmove group is developing in Swedish MSP when such maps are available.
8.6	GDEP	GDEP indicates the need to complete spatial information on European sprat (Sprattus sprattus) spawning grounds with an analysis of the possible impact of the Amended Plan on this species. The impact of planned OWF locations on the grey seal (Halichoerus grypus) is also important. The analyses presented are, in the opinion of the GDEP, too laconic and need to be made more specific. Only information on noise minimisation has been provided, but how the distribution of the different sites will affect its migration and the possible impact on the species' breeding colonies, also in a cumulative context, has not been analysed.	SwAM welcomes a joint discussion on the potential risk arising from large scale offshore wind developments in Swedish and Polish waters.
8.7	GDEP	GDEP asks for clarification on how the planned additional uses will affect aspects of nature conservation in the area (Ö508) and what measures are envisaged to minimise possible impacts, e.g., for fish.	No additional sea uses are proposed the area Ö508.
8.8	GDEP	Carrying out cumulative analyses should not be postponed until the impact assessment stage of a specific project. Such an approach is also contrary to the aim and objectives of Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment.	The SEA has an initial focus on the cumulative effects of the energy areas in the Swedish MSP and highlights potential risks where energy areas in neighbouring countries MSP may add cumulative effects. Further investigations will be made for each individual energy area before exploitation.
8.9	The Regional Directorate for Environmental Protection in Szczecin	The Amended Plan should take into account both national and global spatial impacts. An analysis of secondary and cumulative impacts is carried out as part of the SEA, taking into account other existing and planned developments located outside the area of the Amended Plan under investigation. This issue is particularly relevant in terms of the impact on the Baltic Sea area. In the document 'Summary	The marine spatial plan includes guidance at strategic level taking into consideration migration routes for birds and bats. Some areas energy areas have been excluded during the planning process to minimize potential negative effects on the marine environment including birds, and others will

		of the Impact assessment of the proposal for amended marine 4 spatial plans for the Gulf of Bothnia, the Baltic Sea, Skagerrak/Kattegat and Sund' it is stated that the development of offshore wind farms in the proposed energy areas around the Oland and Gotland islands (Ö256, Ö269, Ö255) together with planned offshore wind farms in neighbouring countries poses a risk of high or medium impact on birds and bats. it is precisely at this stage of the SEA proceedings, and not as part of the impact assessment of individual offshore wind farms (as suggested in the above-mentioned document), that solutions should be indicated which would allow the free movement of birds through the wind farm areas and thus enable them to access the wintering and feeding grounds occurring in the Polish Natura 2000 sites (Słupsk Bank PLC990001, Pomeranian Bay PLB990003, Coastal Waters of the Baltic Sea PLB990002, Szczecin Lagoon PLB320009). This includes avoiding the risk of birds colliding with wind turbines. The solutions proposed and agreed at the SEA stage should provide guidance for the developers of individual wind farms.	require mitigation set at the permitting stage.
8.10	The Department of Maritime Economy in the Ministry of Infrastructure	Indicates the need to participate in intergovernmental consultations at expert level in the form of a meeting with the Swedish Party. Issues related to ensuring the safety of navigation and the coherence of areas designated for shipping and planned offshore wind farms should be discussed. Another important issue to discuss is the cumulative impact of offshore wind farms, including the cumulative barrier effect for the free movement of birds, mammals and fish.	We suggest these issues to initially be discussed on the suggested online meeting between Polish and Swedish expert (se comment above).
8.11	The Maritime Office in Szczecin	Requests intergovernmental consultations at expert level in the form of a meeting with the Swedish Party regarding the issue of taking into account the Polish spatial development plan in the proposed Amended Plan, to allow the Polish areas to be used as per their designated functions.	We suggest these issues be discussed on the suggested online meeting between Polish and Swedish expert (se comment above).
8.12	The Maritime Office in Szczecin	Notes that the Amended Plan may have a significant impact on the safety of shipping, including regular ferry connections maintained between Polish and Swedish ports (ferry routes: Świnoujście –Trelleborg and Świnoujście – Ystad).	Sufficient safety distances will be determined in the application process for individual OWF projects. The safety distance as well as layout of turbines within the energy area will be determined based on details concerning navigation, radar and safety. The marine spatial plan does not provide guidance on safety distances at specific locations.

8.13	The Maritime Office in Szczecin	Requests that elements of the linear technical infrastructure of neighbouring countries, e.g., the Baltic Pipe, should be taken into account when developing the Amended Plan.	Maps of e.g. Baltic Pipe have been requested but not supplied to SwAM by the developer.
8.14	The Maritime Office in Gdynia	Requests participation in the intergovernmental transboundary consultation in the form of an expert meeting for the Amended Plan. The authority raises the issue of inconsistency between the Polish and Swedish plans, which could result in a serious threat to the marine environment (collisions between ships and wind turbines). The issues identified in this respect mainly covering: – in the Ö254 area, a shipping lane which leads through the South-Central Bank (Södra Midsjöbanken) – Ö248. On the Polish side, the Central Bank area is designated in the development plan for the 'acquisition of renewable energy' (POM.60. E) and 'exploration and prospecting of mineral deposits and extraction of minerals from deposits' (POM.61. K). It is planned that once the wind farms will be built in the POM.60. E basin, the customary route to the ports of Lithuania and Latvia will pass through the POM.52. T basin (south of the farms) – the Świnoujście – Ystad shipping route which passes through the Ö283 area, where claims of state interest in shipping are given priority. The width of the fairway between the planned wind farm areas Ö286 - Ö288 is only 4 km (2.1 nautical miles), which may increase the risk of over-approach situations and ship collisions or collisions with wind turbines in this and neighbouring shipping lanes (there were approximately 1,900 ferry crossings between the ports of PLSWI and SEYST in 2023).	Hopefully these issues can be on the agenda for the upcoming mutual meeting. SwAM is aware that there are some issued in the Swedish MSP regarding ferry traffic. Sufficient safety distances will be determined in the application process for individual OWF projects. The safety distance as well as layout of turbines within the energy area will be determined based on details concerning navigation, radar and safety. The marine spatial plan does not provide guidance on safety distances at specific locations.
8.15	The Maritime Office in Gdynia	In the authority's view, a very important issue is the lack of guidance in the Amended Plan on defining specific safe distances of areas for OWF development from ships' shipping routes. This approach may lead to spatial conflict due to the desire of investors to maximise the energy potential of the areas in question. The authority notes that at the scoping stage it pointed out the need to assess the cumulative environmental impact of the areas planned for wind farms in the Polish and Swedish parts of the Baltic Sea. The analysis presented in this respect are considered insufficient.	Sufficient safety distances will be determined in the application process for individual OWF projects. The safety distance as well as layout of turbines within the energy area will be determined based on details concerning navigation, radar and safety. The marine spatial plan does not provide guidance on safety distances at specific locations.
8.16	The Ministry of Climate and Environment, Department of	Indicates the need to assess the cumulative environmental impacts of the alternative energy extraction areas (Ö255, Ö256 and Ö269) with the locations included in the current Polish Spatial development plan for internal sea	In the national review consultation of the plan proposals SwAM has proposed that Ö255 be removed. Any concerns regarding reductions in wind resources will need to be addressed during

	Renewable Energy Sources,	waters and territorial sea and the exclusive economic zone on a scale of 1: 200,000 (in areas: 53.E.1; 60.E.1; 60.E.2; 60.E.3; 60.E.4.). The realisation of offshore wind farm investments in the above-mentioned Swedish areas may also significantly limit the availability of wind for the indicated locations realised in Polish maritime areas.	the permitting process. Additionally, due to Sweden's open-door system, not all proposed areas are expected to be developed.
8.17	The Ministry of Agriculture and Rural Development, Fisheries Department	Sees merit in participating in intergovernmental transboundary consultations in the form of an expert meeting for the Amended Plan. It indicates that the offshore wind energy development planned in the Amended Plan will contribute to cumulative impacts on ongoing fishing activities and living marine resources. According to an analysis of the catch statement of Polish crafts in the last 10 years, about 50 fishing vessels have been fishing in the area of the Swedish Exclusive Economic Zone of the Baltic Sea. The main species caught are sprats, herring, flounder as well as European plaice (Pleuronectes platessa), mackerel and cod. In view of the introduced restrictions on commercial fishing, such as the need to change fishing techniques and fishing locations as a result of the Amended Plan, it is important to ensure that there are adequate ways to compensate fishermen who fish in the area of the planned energy infrastructure.	SwAM takes note of the information on Polish fishery in the Swedish Exclusive Economic Zone. As for financial compensation for and the methods for determining such compensation, it fall outside the scope of Swedish marine spatial planning.