Swedish Agency
for Marine and
Water Management

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Response to comments from neighbouring countries on a proposal for revised Swedish marine spatial plans

Foreword

In this report, the Swedish Agency for Marine and Water Management, SwAM, responds to comments by participating parties in the Espoo-process on the revision of Swedish marine spatial plans

The responses and comments refer to an invitation to participating parties to provide further comments on proposals for revised marine spatial plans that were submitted to the Government by SwAM in January 2025. SwAM received comments from seven countries between March and June 2025.

In February 2026 the SwAM was assigned by the Government to respond to the comments received on the submitted proposal.

This report will be submitted to the Government, together with an amended impact assessment. Some issues raised by the participating parties will be referred to the Government.

SwAM would like to thank all parties who took their time to provide feedback on the submitted proposals for revised marine spatial plans and accompanying environment impact assessment.

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1 Introduction

1.1 The revision of marine spatial plans

On 10 February 2022, the Government adopted Sweden’s first marine spatial plans for the Gulf of Bothnia, the Baltic Sea and the Skagerrak/Kattegat. In connection with the decision on the marine spatial plans, the Government also decided on a new assignment to elaborate proposals for revised plans with the aim to enable energy extraction at sea with an additional 90-terawatt hours of annual electricity production, in addition to the areas included in the adopted marine spatial plans (M2022/00276). On 20 January 2025, the Swedish Agency for Marine and Water Management, SwAM, submitted proposals for revised marine spatial plans and related impact assessment to the Government, which is responsible for the adoption process.

1.2 The ESPOO-process

The Swedish Environment Protection Agency notified potentially affected parties regarding the Swedish marine spatial planning in 2023. The consultation period for the first draft of proposals for revised marine spatial plans lasted from December 2023 to February 2024. On 20 December 2023 an on-line Espoo consultation meeting was held.

On 24 October 2024 the Swedish Environment Protection Agency shared a report with response from SwAM to the received feedback during the Espoo-consultation and invited all countries to provide feedback on the Swedish response.

On 25 November, the Swedish Environment Protection Agency, sent out an information note from SwAM on a Government decision on 4 November 2024 to reject thirteen applications for the establishment of offshore wind in the Baltic Sea Proper due to defence interests and to approve one application for establishment of offshore wind in the Skagerrak.

On 20 January 2025, SwAM submitted MSP-proposals and impact assessments to the Government. The responses from domestic and transboundary consultation were included.

On 31 March 2025, the Swedish Environmental Protection Agency shared the submitted proposal for revised marine spatial plans and the related impact assessment to the parties participating in the Espoo-consultation. On 12 February 2026, SwAM was assigned by the Government to consider and provide responses on the comments that were received in this process.

2 Summary

2.1 Summary of comments received

The comments received are mainly focussing on issues relating to the impact from the potential establishment of offshore wind.

The importance of considering migrating species such as birds, bats and salmon in the cumulative impact assessment is stressed, also the potential impact, not only within, but also

between the different marine spatial plans. In addition to migratory species, the need to protect the harbour porpoise, which is seasonally shifting, is highlighted. A comment is that the cross-border impact is only generally described, and that measures to mitigate impacts is not very clear. One party therefore asks for more detailed discussion of possible cross-border impacts and the implementation of mitigation measures at subsequent planning levels and at project level, including an early consultation and bilateral exchange.

As for bat migration the recommendations according to the EUROBATS agreement in 2014 is referred to. Concerning salmon migration, it is stressed that there is no practical experience from how salmon may be impacted from offshore wind installations and that precaution therefore is called for. Apart from the biodiversity aspect, salmon is also of economic and cultural significance in the Guld of Bothnia area.

Regarding shipping, there are mainly concerns related to safety distance, accessibility and the potential impact on winter navigation in the Gulf of Bothnia, but also to lack of consistency between shipping routes in the Swedish and Polish zones in the Baltic Sea proper.

For the Gulf of Bothnia-plan specifically, there are concerns for the amount, size and location of areas for energy extraction. Apart from potential impact on shipping, the shadowing effects from potential wind farms in the Swedish EEZ is highlighted. In relation to this, there are demands for an update of the impact assessment to include the up-coming areas for offshore wind in the Finnish EEZ in the assessment, as well as the regionally planned areas for offshore wind. There are calls for coordination at strategic level as well as negotiations on the designation of offshore wind areas in the Gulf of Bothnia. It is also stressed a need for joint consideration of cross-border cable routes between Finland and Sweden, taking into account environmental, economic, social, and strategic perspectives.

Several parties provide detailed information as input to the further process.

2.2 Summary of responses (SwAM)

Responses to specific comments are presented in the country tables in section 3 below.

The Swedish Agency for Marine and Water Management welcomes more cross-border cooperation and coordination on marine spatial planning in general as suggested by commenting parties. As the comments show, there are still important knowledge gaps to be filled, such as e.g. on migrating species, winter navigation and hydrographic effects from offshore wind installations. SwAM supports and would welcome further joint knowledge development.

The Swedish marine spatial plans provide guidance on the most suitable areas for different uses of the sea including offshore wind. The Swedish marine spatial plans are not of a regulatory nature, but provides guidance to authorities and municipalities when planning and examining claims for use of the sea.

The maps for the plan shall be interpreted on the approximate scale between 1:700 000 and 1:1 000 000 and the boundaries and markings in the map reflect the strategic level of the marine spatial plans.

The proposal submitted to the government is based on an integrated process that includes the planning as well as the impact assessment. The result of this integrated process is presented in

the proposed marine spatial plan document. In some cases, tentative areas for energy extraction have been removed in the planning process due to their potential environmental impact if realised. In other cases, areas for energy extraction that may have significant environmental impacts especially if established together with other areas are included in the plan proposal. The Government can exclude more areas based on the information of the SEA-report. The Strategic Environment Assessment, SEA reflects the strategic nature of the proposed marine spatial plans, SwAM. The role of the SEA, is to provide an assessment of the potential significant environmental impacts at the strategic planning level.

All issues are not resolved at the national planning level, but are taken care of in the further planning at municipality level or in the permitting process. One example is the precise safety distance between shipping routes and offshore wind turbines which is not reported in the plan. Instead, it is generally assumed that the safety distance is included in the area for energy extraction.

It should be noted that the Swedish plans do not indicate that all designated offshore wind areas should or will be established. There is no specific national target for offshore wind production or capacity. The assessment is that permits for energy extraction will not be applied for or given in all or all parts of the areas specified for energy extraction due to several uncertainties.

Uncertainties about which areas, and to what extent the areas can be utilised relate to defence interests, nature protection and overall cumulative impact on nature values, adaptation to commercial fishing and winter navigation, as well as the requirement for municipal endorsement in the territorial sea. Other aspects are consideration of the cultural environment, recreational and landscape values.

The need for safety distances between wind farms and shipping routes will affect the potential capacity that can be installed in a certain area. An overall assessment is that around 15-20 % of the planned area for energy extraction presented in the spatial plan maps will be needed to accommodate safety distances to shipping routes.

The uncertainties imply that the cumulative impact assessment which includes all areas for offshore wind energy in their totality can be seen as an unrealistic “worst-case” – scenario showing maximum impact.

It should be noted that in Sweden's current permitting system for offshore wind energy installations, which can be described as a so-called open-door system, more detailed investigations will be conducted at a later stage in the permitting process. The planning authority is required to carry out the strategic environmental assessment in accordance with the Directive on Strategic Environment Assessment (SEA Directive (2001/42/EC)) but for actual projects, it is the operators who are responsible to carry out the detailed environmental impact assessment in accordance with the Directive on Environment Impact Assessment (EIA Directive (2011/92/EU)).The open-door system also means that is possible to apply for a permit in sites outside the areas for energy extraction listed and presented in an adopted marine spatial plan. Currently, several applications for offshore wind farms are under review by the government. Some of these projects entirely or partially overlap with the current or proposed marine spatial plans. Detailed studies and Environmental Impact Assessments (EIAs) have been or will be conducted for these projects before they are potentially granted approval by the Government or the Land -and Environment Court. The project-specific EIAs include an analysis of the impacts on

aspects also covered in the SEA for Sweden's marine spatial plans, but at a much more detailed level.

One of the aims of the marine spatial plans is to provide guidance and information to the Government and Land and Environment courts when they are assessing specific wind farm project applications. SwAM, along with other expert authorities and stakeholders, is involved in reviewing the impact assessments related to specific projects applying for permits. Specific conditions can be proposed and established at this later stage in the permitting process. This includes details such as safety distances from shipping routes, offshore park layouts that consider other interests, or specific conditions aimed at reducing negative impacts on environmental aspects.

Some comments related to matters not within the mandate of SwAM to consider, have been referred to the Government.

2.3 Amendment to the impact assessment

In order to improve the presentation of the planning of offshore wind energy in the Gulf of Bothnia SwAM will amend the map of planned energy areas in the Gulf of Bothnia presented in the impact assessment document to also include Finland’s sector planning for offshore wind including four proposed wind farm areas in the Finland’s Exclusive Economic Zone and areas in Finland’s territorial sea. The areas in the EEZ have been proposed by the Ministry of Economic Affairs and Employment as part of the implementation of the Finnish Act on Offshore Wind Power in the Exclusive Economic Zone (937/2024). The update impact assessment will be submitted to the Government.

3 Tables with comments and responses by country

Statements have been translated into English with the use of the EU e-Translation tool. The tables show summaries of the statements.

3.1 Denmark

Comments related to defence matters are not included in the table, but are referred to Government for further consideration.

ID	Respondent	Comment	Response (SwAM)
1.1	The Danish Agency for Green Transition and Aquatic Environment.	The realisation of specific projects under Swedish Marine Plan, could lead to transboundary effects, including potential negative effects on the marine environment, as well as having an impact on Denmark's achievement of its objectives, in relation to the Water Framework Directive (Directive 2000/60/EC).	SwAM takes note of the comment.
1.2	The Danish Agency for Green Transition and Aquatic Environment.	Realisation of specific projects under the plan could potentially have a cross-border impact on regularly occurring migratory birds in Denmark, including displacement from wintering areas and migration areas	SwAM takes note of the comment. The impact assessment identifies the risk of cumulative transboundary negative effects on migratory birds from offshore wind areas in both Denmark and Sweden.
1.3	The Danish Agency for Green Transition and Aquatic Environment.	Realisation of specific projects under the plan could potentially have potential negative impact on the already vulnerable Baltic Sea population of harbour porpoises, which is part of the basis for the designation in Danish Natura 2000 areas. This could affect Denmark's obligations under the Habitats and Birds Directives.	SwAM takes note of the comment. Already permitted offshore wind areas are included in the plan for the Baltic Sea, assessed to have neglectable negative impacts on the Baltic population of harbour porpoise.
1.4	The Danish Agency for Green Transition and Aquatic Environment.	Acknowledges some good objectives in the submitted marine spatial plans, in particular: •Ecosystems have recovered, or are recovering, and their ability to generate long-term ecosystem services is secured •Biodiversity and the natural and cultural environment are preserved, promoted and used sustainably •The share of renewable energy is increasing and energy use is efficient with minimal impact on the environment Against this background, we would like to continue to follow the process of future concrete projects in relation to the marine spatial plans.	SwAM takes note of comment. It should be noted that there are separate consultation procedures for specific projects.

3.2 Estonia

ID	Respondent	Comment	Response (SwAM)
3.1	The Estonian Fund for Nature	Offshore wind energy and other economic activities outlined in the spatial plan have a significant cumulative impact on biodiversity across the Baltic Sea. While the decision to halt 13 offshore wind farm projects reduces environmental impact in that area, negative effects persist in the Gulf of Bothnia and the Danish Straits. The documents acknowledge potential negative and cumulative impacts on birds, marine mammals, and bats but do not include mandatory mitigation measures or clear guidance on avoiding sensitive areas. While some strategies (such as turbine blade colouring, operational pauses, acoustic deterrents before high noise activities) are mentioned, their effectiveness is uncertain. Additionally, both Estonia and Sweden have signed the EUROBATS agreement and should follow its guidelines. The Guidelines for Consideration of Bats in Wind Farm Projects (Revision 2014) provide detailed recommendations for assessing wind farm impacts on bats, emphasising the need for cross-border cooperation when planning wind farms along bat migration routes. The documents should outline clear measures and principles to ensure that offshore wind energy development does not pose a significant threat to bird populations, marine mammals (including eliminating the risk of porpoise extinction in the Baltic Sea), or bats.	Mitigation measures for offshore wind farms are handled in the permitting process. Best available techniques might change during the validity of the plan. The protection of bats is handled under the species protection legislation.
3.2	The Estonian Fund for Nature	The ecosystem-based approach in the spatial plan should be strengthened – for example, by defining a 30% marine protection target or, even more effectively, by mapping the necessary areas for conservation.	Swedish marine protected areas, MPA:s, are established in a parallel process to the Swedish marine spatial planning. The regional County Administrative Boards have a specific role in MPA-development. Swedish marine spatial plans include all adopted MPAs as part of the N-area designation. In addition, the plan proposals include areas with high nature values (including planned MPA:s) informing marine management and maritime operators.

3.3 Finland

ID	Respondent	Comment	Response (SwAM)
4.1	The Centre for Economic Development, Transport and the Environment of Lapland	Refers to its earlier opinion on the matter (17 January 2024) and further emphasises the importance of assessing the combined effects of offshore wind power plants planned for different sea areas and regions in different countries. Synergies should be assessed at masterplan level, since the assessment of the environmental impact of individual projects is limited to the synergy between the project in question and known projects located in the surrounding area. Many species of birds, fish and marine mammals that may be affected by offshore wind projects often circulate in large areas of the Baltic Sea.	SwAM takes note of the comment. The main focus in the assessment is on the potential effects of the Swedish plan, but potential cumulative and transboundary effects are highlighted in the section Cumulative and transboundary effects for each environmental aspect in the assessment.
4.2	The Centre for Economic Development, Transport and the Environment of Lapland	Draws attention to the hydrographic effects highlighted in the evaluation report. According to the modelling study, large-scale offshore wind energy construction can have effects on hydrographic factors such as temperature, salinity, currents and stratification. Based on the results, the large-scale expansion of offshore wind power in the Baltic Sea may cause the halocline to move towards the surface and the salinity and temperature to rise deeper due to the wind attenuation caused by the wind farm, which leads to weakened mixing. This may have a wider impact on the food networks and eutrophication development of the entire Baltic Sea, and the impacts are likely to be reflected on the Finnish side as well.	The impact assessment highlights the need for further investigations in how hydrographic conditions may be affected by large scale offshore wind development especially in the Gulf of Bothnia.
4.3	The Centre for Economic Development, Transport and the Environment of Lapland	As regards the current state of salmon stocks in the Gulf of Bothnia, the Centre for Economic Development, Transport and the Environment notes that, for example, the number of spawning salmon that have ascended the Tornio River has decreased sharply since 2022. In 2023, there were only around 20 000 salmon and in 2024 around 24 000 salmon. Poor salmon migration is estimated to lead to a decrease in migrating juvenile production and below the sustainable (MSY) target level set for the river-specific Tornionjoki salmon stock (Palm et al. 2025). It is not yet known whether the weak migration in 2023 and 2024 is due to a short-term dip or	SwAM takes note of the comment. SwAM will follow research on migratory fish in relation to offshore wind.

ID	Respondent	Comment	Response (SwAM)
		whether it is a longer-term period characterised by poorer sea survival and weakened escapement. At least in 2025, the spawning of salmon in the Tornio River is at risk of being weak. The development of salmon stocks in other rivers in the Bothnian Bay over the past couple of years is also a cause for concern. The ELY Centre considers that data gaps and uncertainties concerning migratory fish in particular should be clearly highlighted with regard to the conclusions of the impact assessment report. For example, information on salmon migration routes in the sea area is incomplete, and the migration behaviour of salmon migration juveniles in the sea area is hardly known at all. The Natural Resources Institute Finland and SLU (Swedish university of agricultural sciences) have launched a joint project to study the behaviour of migratory fish in the Gulf of Bothnia using acoustic telemetry (2025-2026). In the view of the Lapland Centre for Economic Development, Transport and the Environment, consideration should also be given to identifying migratory fish migration routes in the areas of wind farms planned for the sea area. On the other hand, the effects of the use of wind farms on migratory fish in the conditions of the Bothnian Bay are unknown. Wind power construction can change, for example, the temperature, flow and salinity of a sea area inside and outside a wind farm. The effects of the changes described above, together with noise, flicker effects and electromagnetic radiation during the operation of the wind farm, for example, on the migration behaviour of salmon, have not been studied	

ID	Respondent	Comment	Response (SwAM)
5.1	The Council of Oulu Region	In terms of Northern Ostrobothnia's regional planning, the phased regional land use plan for energy and climate for Northern Ostrobothnia in Finland is currently being approved, which also addresses offshore wind power in the region's territorial waters. A total of five offshore wind energy areas have been proposed, three of which are close to the border of the Finnish EEZ and within the sphere of influence of the offshore wind energy areas in the Swedish Marine Plan. In addition, OX2's Halla project is in the planning stage in the Finnish EEZ and is also a candidate for a tender area in the EEZ by the Ministry for Economic Affairs and Employment of Finland	SwAM takes note of the information.
5.2	The Council of Oulu Region	The Regional Council of Oulu considers that the Swedish marine spatial plan has merit, but the marine spatial plan has failed to consider, for example, the so-called shielding effects of large wind power areas, which can also have a significant impact on wind power projects in neighbouring countries. More should also be done on joint research across national borders, such as migratory fish research, since these are shared marine areas. In addition, interaction between countries should be increased to further minimise transboundary cumulative negative impacts and to develop offshore wind projects on both sides of the Gulf of Bothnia	SwAM is aware of the possibility of wake induced loss on offshore wind farms, but due to the uncertainties regarding what energy extraction areas will be realised, no quantitative wake effect studies have been made during the MSP-process. In the strategic impact assessment, however, the potential transboundary impact on wind energy installations is mentioned. SwAM would welcome more joint research on migratory species between the countries.
6.1	The Finnish Coordination Group for Marine Spatial Planning	Following the consultation round, changes have been made to the draft Swedish marine spatial plans. The most significant of these is the decision to remove all proposed offshore wind from the main Baltic Sea, based on a decision by the Swedish government in November 4, following statements from the Swedish Armed Forces. The removal of the sites has led to an expansion of the areas allocated to the Gulf of Bothnia, which has implications for the planning and use of Finland's marine areas. We consider it important that such significant changes are clearly specified and properly documented also as part of the environmental impact assessment. The Finnish Coordination Group for Maritime Spatial Planning cooperation stresses the importance of a	SwAM takes note of the comment. The Government decision to not approve 13 applications for the establishment in the Baltic Sea proper area has not impacted the proposal for the marine spatial plan for the Gulf of Bothnia in terms of areas for energy extraction. It is assumed that the realisation of offshore wind in the Gulf of Bothnia will depend on local and regional conditions independently of the Swedish withdrawal of further offshore wind areas in the marine spatial plan for the Baltic Sea.

ID	Respondent	Comment	Response (SwAM)
		continuous and reciprocal information exchange and hopes to participate in future intergovernmental negotiations and also before adoption of the Gulf of Bothnia plan. We suggest that the abovementioned issues be considered in the further work of the environmental assessment process and in the preparation of the final marine spatial plans.	Concerning negotiation, SwAM refers the matter to the Government as negotiation is not within the mandate of SwAM to consider.
7.1	The Finnish Heritage Agency	The impact assessment document is thorough. In each of the three geographical areas of the MSP, the impact of the energy areas on the different activities has been assessed. The cultural environment and heritage are strongly involved in the impact assessment. If the planned energy area is less than 35 km from the cultural environment, special attention should be paid to the visual effects during the preparation of the energy project. Underwater cultural heritage has been taken into account, which is important in energy projects in the maritime area. The impact assessment takes into account the negative visual and landscape effects of energy projects on cultural environments, Swedish World Heritage sites and recreation. In the view of the Finnish Heritage Agency, the authorities of each country must ensure that the cultural environment is adequately and appropriately taken into account in marine spatial planning. In Sweden, the preparation of the maritime spatial plan has been careful with regard to the cultural environment, judging, among other things, from the fact that the preparation has included the definition of so-called maritime value areas along the entire coast and, for example, the information on marine archaeological sites has been updated in the provinces in connection with the preparation of the cultural environment register. The cultural environment and heritage have been taken into account in a good way in the proposed amendment to the marine spatial plan. The Finnish Heritage Agency has no objections to the proposed amendment and the impact assessment	SwAM takes note of the comment.

ID	Respondent	Comment	Response (SwAM)
8.1	The Finnish Meteorological Institute	The Finnish Meteorological Institute considers that environmental impacts and their uncertainties have been assessed extensively. There is little comprehensive research on the Baltic Sea, and almost no existing examples of the effects of offshore wind energy on the environment. The report refers to the SMHI study on the impact of offshore wind on hydrography throughout the Baltic Sea region, which is probably the most comprehensive report on the subject. The Finnish Meteorological Institute considers that the effects of the implementation of the marine spatial plan on the environment have been taken into account comprehensively, and it is possible to plan mitigation measures based on them when offshore wind power is built in the future.	SwAM takes note of the comment.
9.1	The Finnish-Swedish Trans-boundary River Commission	The situation of wild salmon in the Gulf of Bothnia has improved since a couple of decades, and today shows good status, while stocks further south generally become weaker. Reduced fishing and other measures have led to reduced mortality in recent years, but there are concerns about disease-related mortality in several rivers. The Commission points out that this is somewhat dated information. At the time of writing, the status of Torne River salmon after the last two summers is worryingly bad. According to last year's report *Torneälvens bestånd av lax, havsöring och vandringssik – gemensamt svensk-finskt biologiskt underlag för bedömning av lämpliga fiskeregler under 2025* published annually in cooperation between SLU and the Finnish Natural Resources Institute Finland (LUKE). Preliminary data from 2024 indicate a continued weak return migration of salmon to many watercourses in the Gulf of Bothnia, including the Torne River. It is currently unclear what is behind this change, but a continued deterioration in natural sea survival, possibly in combination with delayed sexual maturity, is a probable explanation that needs to be investigated.	SwAM takes note of the information. SwAM includes the shared information about the status in the reproduction rate of salmon in Torne River, in its planning evidence.

ID	Respondent	Comment	Response (SwAM)
		The downward trend in the number of spawning migrators since 2021 is clearly worrying and, unfortunately, there is a clear risk that stock trends in recent years may mark the start of a downward trend for the stock. ‘For a long time, the salmon population of the Torne River showed a positive trend where the size of the return migration and smolt production meant that the stock was at or above the MSY level. However, spawning return in 2023 and 2024 has been remarkably weak and significantly lower than ICES forecasts, which is most likely explained by a deterioration in natural sea survival (see Section 2.1). The weak migrations of salmon in 2023-2024 are expected to result in smolt production that in a few years is below the MSY level of the stock and the slightly higher national target levels indicated by Sweden and Finland (reference to a figure). The Commission notes that the latest research points to a deterioration in the sea survival of Torne River salmon and there is a risk of negative stock trends for the coming years. With this in mind, the Commission highlights the particular importance of acting in accordance with the precautionary principle. This negative outlook should be kept in mind when assessing the possible impact of planned offshore wind energy, as salmon stocks may be able to withstand fewer negative impacts than those assessed based on literature studies.	
9.2	The Finnish-Swedish Transboundary River Commission	The Commission notes that there is still no practical experience on offshore wind to assess the actual impact on salmon in the Bothnian Bay and the Baltic Sea. One factor that complicates the assessment of impacts is the amount of offshore wind power planned throughout the wider international Baltic Sea region and cumulative effects that may arise from such a large-scale change in the marine environment.	SwAM takes note of the information.

ID	Respondent	Comment	Response (SwAM)
9.3	The Finnish-Swedish Transboundary River Commission	Underlines what was already commented on in the first round of opinions, that it is impossible to take a position on proposed energy areas without taking into account the totality of energy areas throughout the Gulf of Bothnia and the Baltic Sea. There is still a need for an assessment of cumulative impacts of all planned wind power in the cross-border sea basin in question. Such a more strategic assessment of the impact of all planned offshore wind energy requires good cross-border cooperation with the other Baltic Sea countries.	SwAM shares the view that sea basin wide transboundary assessments of potential impacts from offshore wind are essential for an understanding of cumulative impacts. Transboundary impact has been considered.
10.1	The Finnish Transport and Communication Agency	Traficom reiterates the concerns it has already expressed in previous opinions regarding the allocation of energy production areas to the immediate vicinity of areas used by shipping. In the reviewed Gulf of Bothnia marine spatial plan, energy extraction areas have been designated in the immediate vicinity of key traffic areas and in some places on both sides of the maritime traffic areas, which weakens, among other things, maritime safety and increases the possibility of environmental risks. Experience in permitting and clearing procedures for individual offshore wind projects has shown that it is very difficult to obtain changes to spatial demarcation after the start of project planning and when the project developer has set capacity and annual production targets. This would justify stronger coordination between maritime and energy extraction areas, not only in the permitting and clearance procedures for individual projects, but also in high-level strategic guiding plans – such as marine spatial plans – which provide a broad overview of the spatial planning and coordination across project and national borders.	SwAM takes note of the comment. When designing the energy areas, the safety distance is generally included in the surface of the energy area. The safety distance is therefore not reported in the plan map. The location of a wind farm and the distance needed in an individual project are determined in the permitting process. The marine spatial plans do not provide guidance on specific safety distances. SwAM agrees that possibilities to harmonise between Swedish and Finnish MSP would increase if the planning phases were more synchronised. We welcome more joint knowledge building and sea basin wide assessments of potential impacts in future.

ID	Respondent	Comment	Response (SwAM)
10.2	The Finnish Transport and Communication Agency	In the revised plan for the Gulf of Bothnia, the energy production areas are located in the immediate vicinity of maritime transport areas and in places so that the transport area is between the energy production areas. This reduces maritime safety and increases the risk of an environmental-polluting accident. The coordination of shipping and energy production, also taking into account smooth and safe year-round shipping, must be done as early as possible and taken into account as far as possible in the upper-level guiding plans. The further the offshore wind energy project or other energy extraction project progresses, the more difficult it will be to make changes and restrictions to take into account the operating conditions of shipping. From the point of view of shipping in Finland and the Gulf of Bothnia, it would have been desirable for the territorial boundaries of the energy extraction areas assigned to the external border of the Swedish exclusive economic zone to take into account the operating conditions of Finnish and Swedish shipping more equally. By allocating energy extraction areas to the outer border of the exclusive economic zone, where the main maritime traffic areas of the Gulf of Bothnia are also located, the impacts caused by wind power areas are shifted in many places towards the east and the Finnish sea areas. If the energy extraction areas are realised, maritime traffic routes are likely to move more and more to the Finnish sea areas, complicating in particular the traffic arrangements in the Bothnian Bay and the operating conditions of shipping. The selection of offshore wind power areas to be built in Finland's exclusive economic zone is carried out in a process led by the Ministry of Economic Affairs and Employment, in which different interests in the use of the sea are reconciled from the very beginning. Preliminary regional demarcations will be published in early summer 2025. Their design takes into account the needs of the offshore maritime route, which should also be taken into account in Sweden's plans.	SwAM takes note of the comment. The planning for shipping is based on IMO-regulations, traffic intensity, and the needs today and in the future. When designing the energy areas, the safety distance to shipping routes is generally included in the surface of the energy area. The safety distance is therefore not reported in the plan map. The location of a wind farm and the distance needed in an individual project are determined in the permitting process for the wind farm. The marine spatial plan does not provide guidance on specific safety distances. It should also be noted that the marine spatial plan proposals do not indicate that all designated offshore wind areas should or will be realised. SwAM welcomes more joint knowledge building and sea basin wide assessments of potential impacts.

ID	Respondent	Comment	Response (SwAM)
13.1	The Ministry of Economic Affairs and Employment	In accordance with a law on offshore wind energy in the exclusive economic zone (EEZ), which entered into force at the beginning of 2025, the Government will organise a competitive bidding process for the offshore wind power areas in the exclusive economic zone and the Energy Authority to allocate the areas to project developers. In May 2024, the Government issued negative decisions on applications for exploitation rights submitted under the Act on the Finnish Exclusive Economic Zone (EEZ), seeking exclusive rights for the development of a specific area for offshore wind energy production. At the time of the negative decisions, a new law on offshore wind power was already under preparation and the intention has been to distribute offshore wind power areas to project developers through competitive tendering organised by the Energy Authority in accordance with the new law. The selection of offshore wind power areas in the exclusive economic zone has been prepared in Finland, and an environmental impact assessment of the authorities' plans and programmes is planned to begin in May from the draft decision of the State Council on the selection of areas. The draft decision includes four offshore wind regions in the¬ EEZ, all located in the Gulf of Bothnia. In line with the view of the Ministry of Economic Affairs and Employment, the Swedish marine spatial plan should pay more attention to the effects of the proposed energy production areas on the utilisation of offshore wind potential in Finland's exclusive economic zone. It has been difficult to take the impacts into account on a concrete level, as Finland has not yet made decisions on the designation of offshore wind power areas in the exclusive economic zone. The progress made in the selection of offshore wind power areas in the EEZ would make it possible to better assess the impacts. In particular, project areas B111, B113, B135 in the Bay of Bothnia and B160 and B161 in the Bothnian Sea bordering or adjacent to the south-eastern border may have significant impacts on the utilisation of offshore wind potential in	The Swedish marine spatial plans provide guidance on the most suitable areas for different uses including offshore wind. The Swedish plans do however not indicate that all designated offshore wind areas should or will be established. Concerning the matter of negotiation, SwAM refers it to the Government as negotiation is not within the mandate of SwAM to consider.

ID	Respondent	Comment	Response (SwAM)
		Finland's exclusive economic zone. In the view of the Ministry of Economic Affairs and Employment, prior to the adoption of the Gulf of Bothnia marine spatial plan there is a need for negotiations between the countries on the designation of offshore wind power areas in order to coordinate the utilisation of the potential of wind energy in the Finnish and Swedish sea areas of the Gulf of Bothnia.	
14.1	The Ministry of the Environment	With the removal of the energy extraction areas in the Baltic Sea Marine Plan, it can be interpreted that the pressure for offshore wind power generation has shifted to the Gulf of Bothnia. This situation has changed significantly since the first draft of the Gulf of Bothnia marine spatial plan, which was consulted between 12/2023 and 2/2024. Currently, altogether 6 600 km^2 of energy extraction and exploration areas are designated in the Gulf of Bothnia. Although the total area is smaller than in the first draft, as many as seven of the energy extraction study areas in the previous draft are designated as energy extraction areas in the current draft. There have also been changes to the original delimitation of the areas. The Ministry of the Environment considers that these changes to the energy extraction areas in the Gulf of Bothnia are significant and, if implemented, could have a cumulative cross-border impact. energy areas in the Finnish EEZ can also be identified	SwAM takes note of the comment. It is assumed that the realisation of offshore wind in the Gulf of Bothnia will depend on local and regional conditions independently of the Swedish withdrawal of further offshore wind areas in the marine spatial plan for the Baltic Sea. Full use (100 %) of energy extraction areas is not possible, nor wanted. This is in part due to the cumulative effects of large areas of offshore wind power, or multiple areas in adjacency. The purpose of the plan is to guide to potential energy areas, and guide away from areas less suitable. It is then up the permitting process (if there are applications) to decide which areas can be developed. The marine spatial plan provides guidance on the most suitable areas for different uses including offshore wind. The marine spatial plans do however not indicate that all designated offshore wind areas should or will be established. Cumulative assessments based on the Swedish proposed plans are therefore unrealistic worst-case scenarios.
14.2	The Ministry of the Environment	As the energy areas are mainly located in the economic zone and in many areas either adjacent to or close to the Finnish EEZ, significant shadowing effects of offshore wind farms on	SwAM takes note of the comment. SwAM is aware of the possibility of wake induced loss on offshore wind farms, but due to the uncertainties

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		potential wind energy areas in the Finnish EEZ can also be identified.	regarding energy areas, no wake effect studies have been made. In the strategic impact assessment, however, the potential transboundary impact on wind energy installations is mentioned.
14.3	The Ministry of the Environment	Highlights the situational picture of the development of offshore wind power in Finland's exclusive economic zone and the current need to develop cooperation between countries in mapping the natural values of the exclusive economic zone. -In Finland, the Act on Offshore Wind Power in the Exclusive Economic Zone (937/2024) entered into force at the beginning of 2025, which guides the project development of offshore wind power. The Espoo consultation on the offshore wind power areas assigned to the exclusive economic zone will take place during 2025. -In August 2024, Finland published an action programme for the promotion of offshore wind energy with 17 proposals for measures on offshore wind power. If implemented, these measures will contribute to Finland's marine wind power targets related to increasing the production of renewable energy. -One draft measure (No. 14) relates to the filling of knowledge gaps in offshore areas. Finland has identified the need for a large-scale mapping of offshore areas in the Gulf of Bothnia, as the exclusive economic zone lacks a comprehensive, up-to-date and multidisciplinary knowledge base needed to plan energy investments, ensure safe shipping, communication infrastructure and the sustainable use of the sea. Finland sees it as important and useful to start discussions with Sweden on the mapping of offshore areas.	SwAM takes note of the information. SwAM welcomes developing common planning evidence for the Gulf of Bothnia with relevant authorities in Finland.
14.4	The Ministry of the Environment	Before approving the Gulf of Bothnia marine spatial plan, there is a need for negotiations between the countries on the designation of offshore wind power areas in the Gulf of Bothnia in order to ensure a sustainable development picture	Concerning the matter of negotiation, SwAM refers it to the Government as negotiation is not within the mandate of SwAM to consider. It should be noted that the Swedish marine spatial plan is guiding and not binding in relation to the installation of wind energy.

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14.5	The Ministry of the Environment	Before approving the Gulf of Bothnia marine spatial plan, there is a need for an assessment of cumulative transboundary impacts taking into account the amended Swedish Gulf of Bothnia Maritime Spatial Plan proposal, Finland's current maritime spatial plan and the offshore wind power areas to be designated in the Finnish exclusive economic zone	SwAM takes note of the comment. The impact assessment identifies that cumulative effects in the Gulf of Bothnia may primarily arise in relation to impacts on birds, harbour seals, fish, landscape, cultural environment, outdoor recreation, water (hydrography), commercial fishing and shipping. Also in the impact assessment, it is identified that planned energy establishment in Finland primarily may contribute to particularly cumulative impacts on birds, bats, harbour seals, fish, commercial fishing, energy and shipping. The SEA reflects the strategic nature of the proposed marine spatial plans, SwAM does not propose a revision of the SEA at this stage apart from adding information on four proposed offshore wind sites in the Finnish Exclusive Economic zone, EEZ. All but one proposed area overlap fully or partly with areas in the Finnish maritime spatial plan. However, in order improve the presentation of the planning of offshore wind energy in the Gulf of Bothnia SwAM proposes that the map of planned energy areas in the Gulf of Bothnia presented in the impact assessment document to be updated to also include Finland’s sector planning for offshore wind including four proposed wind farm areas in the Finland’s Exclusive Economic Zone and areas in Finland’s territorial sea. The areas in the EEZ have been proposed by the Ministry of Economic Affairs and Employment as part of the implementation of the Finnish Act on Offshore Wind Power in the Exclusive Economic Zone (937/2024).

ID	Respondent	Comment	Response (SwAM)
			Finally, SwAM sees continued dialogue with neighbouring countries including Finland as a necessity for further developing the assessment of cumulative impacts from a sea basin perspective.
14.6	The Ministry of the Environment	Before approving the Gulf of Bothnia marine spatial plan there is a need to jointly consider the cable routes of offshore wind turbines crossing the Finnish-Swedish border and, in this context, consider both environmental, economic, sociological and strategic aspects.	SwAM takes note of the comment. Currently, the plans do not contain any cable corridors, due to the uncertainties involved, for example in relation to land-fall options. Land connections are handled on a project basis.
15.1	The Ministry of Transport and Com-munications	In the revised Swedish marine spatial plan for the Gulf of Bothnia, energy extraction areas have been located in the immediate vicinity of important traffic areas and in places on both sides of the maritime traffic areas, which can have significant negative impacts on the safety and fluidity of shipping. The Ministry of Transport and Communications considers it important to coordinate the needs of maritime transport and energy extraction not only in permitting procedures for individual projects, but also in guiding strategic plans, such as marine spatial plans, in which the totality and coordination of the use of areas is guided by a broad perspective across project and national borders. The offshore wind projects planned for the Gulf of Bothnia and the Baltic Sea have increased significantly in recent years. The planned projects are often located in exclusive economic zones (EEZs) close to their external borders. The Ministry of Transport and Communications reiterates its earlier statement that when considering the inclusion of new offshore wind farms in marine spatial plans, the authorities should take into account the effects of offshore wind farms on the shipping of the entire Gulf of Bothnia and the Baltic Sea region. Offshore wind farms can have an impact on shipping to and from Finland. Particular attention must be paid to the development routes used by winter shipping,	SwAM takes note of the comment. The Swedish marine spatial plans provide guidance on the most suitable areas for different uses including offshore wind and shipping. The Swedish plans do however not indicate that all designated offshore wind areas should or will be established. When designing the energy areas, planning the safety distance is generally included in the surface of the energy area. The safety distance is therefore not reported in the plan map. The location of the wind farm and the distance needed in an individual project are determined in the permitting process for a wind farm. For all energy extraction areas in the Gulf of Bothnia, the marine spatial plans states that the coexistence of shipping may require adaptations and that conditions for winter navigation need to be taken into account. The knowledge on how offshore wind energy affects ice formation, conditions for icebreaking and winter navigation is still developing, and has to be taken into account for specific areas in the permitting process. SwAM welcomes more joint knowledge building and sea basin wide assessments of potential impacts.

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		which differ from those used in open waters. In other respects, the Ministry of Transport and Communications refers to the statement of the Finnish Transport and Communications Agency Traficom.	
16.1	The Natural Resources Institute Finland (LUKE)	The assessment report on the impacts of the proposed plan has well highlighted the risks related to potential cumulative effects of offshore wind energy in the Gulf of Bothnia. The risks relate, for example, to the nesting of seals in the Bothnian Bay and to migratory birds. A large amount of offshore wind power is also planned for the Finnish sea area in the Gulf of Bothnia. The possible combined effects of offshore wind power do not respect national borders. Therefore, Luke believes that in the future, all cumulative effects should be considered as a for the Gulf of Bothnia. This could be achieved better if, in the future, the updates to the Swedish and Finnish marine spatial plans were carried out on the same schedule. Additionally, Luke [Natural Resources Institute Finland] notes that, in particular, that more useful research data are urgently needed, especially for assessing and anticipating combined effects	SwAM agrees that possibilities to harmonise between Swedish and Finnish marine spatial plans would increase if the planning phases were more synchronized. We welcome more joint knowledge building and sea basin wide assessments of potential impacts.
17.1	The Regional Council of Lapland	The south-eastern part of Malören is designated as an area where particular attention needs to be paid to overall safety, high natural values, such as fish spawning and mammal areas, and high cultural heritage values. The area is suitable for foundations attached to the bottom. The data also states that the area is used for winter navigation, which should be taken into account in terms of impacts. The data do not show how much of the desired increase in production would be accounted for by the region, nor how and in which direction the potential energy produced in the regions is planned to be transferred for recovery.	The impact assessment provides an approximate of electricity production per energy area. See *Table 18. Plan proposal Gulf of Bothnia. Overview of guidance on energy extraction, location and conditions* showing the estimated production per area and the total for the plan area.

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17.2	The Regional Council of Lapland	In its previous statement, the Regional Council of Lapland has highlighted the Swedish marine spatial plan in relation to the Finnish maritime spatial plan and the regional plans in force in the Lapland region, as well as the Lapland Agreement. Subsequently, on 2 December 2024, the Board of the Regional Council of Lapland decided to initiate the drawing up of the Regional Plan for Safety and Transport in Lapland 2050, to announce the initiation of the Regional Plan and to make the participation and assessment plan available. The Regional Plan for Safety and Transport in Lapland 2050 was announced on 24 January 2025. The goal of the phase county plan is to update the current county plans due to the geopolitical situation and to respond to changes in the operating environment with regard to land use planning, especially with regard to the transport system and safety. In accordance with the Lapland Transport Strategy 2050, the goal of the phase-province plan is to demonstrate the development objectives of the transport system and to take into account the land use needs of the Defence Forces. In addition, the aim is to identify major areas of industrial or warehouse buildings. The Lapland Transport Strategy 2050 states, among other things, that the development of ports and connections to the port must take into account the needs of military mobility. The action programme will connect the waterways leading to the ports of Ajos in Kemi and Röyttä in Tornio to the Swedish fairways and deep open water until 2036 in cooperation with Sweden and ensure icebreaking in the ports of the Bothnian Bay. The strategy for 2050 identifies the fairways and ports serving the needs of vessel traffic, as well as the target areas for the development of nationally significant port operations, in which the expansion and development needs of the ports are secured. For maritime transport, the port of Ajos in Kemi – the Swedish waterway network and the port of Röyttä in Tornio – the Swedish waterway network have been designated as the shipping routes to be developed.	SwAM takes note of the information.

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18.3	The Regional Council of Lapland	The proposal for a marine spatial plan has successfully identified these cross-border impacts. The Regional Council of Lapland considers the environmental impact assessment to be essentially correct and agrees with the estimates of the uncertainties of certain impacts presented in the proposal. However, the Regional Council of Lapland continues to emphasise that if the implementation of energy extraction areas results in impacts on winter navigation or migratory fish of the Tornionjoki river, especially salmon, the impacts will be cross-border. This applies to all energy extraction areas assigned to the Gulf of Bothnia, taking into account both the production area itself and, in the case of migratory fish, also the transmission to the mainland, the cumulative and synergistic effects they create. The Regional Council of Lapland emphasises that migratory fish have great ecological, cultural and economic significance in the Tornionjoki valley and the Bothnian Bay, as well as in the wider Baltic Sea. The rise of migratory fish in the Tornionjoki river must not be endangered. Common whitefish (*Coregonu lavaretus*) is a significant part of the identity of the Tornio River Valley. In addition, the whitefish slipping tradition of the Tornio River Valley is being applied for the status of UNESCO's intangible cultural heritage. The Regional Council of Lapland calls for attention to be paid to the fact that winter shipping has a pronounced regional significance in Lapland and also in the wider region of Finland. In addition, the Regional Council of Lapland considers it necessary to check whether the energy area in the south-eastern part of Malören is relevant in terms of security of supply and military mobility, for example with regard to the connection between Kemi and Luleå during the winter. If necessary, the area should be adapted to these needs. The natural and landscape impacts of the south-eastern part of Malören are also cross-border and can also have an impact on tourism, which is a significant regional economic sector in Lapland and has	SwAM takes note of the comment. SwAM agrees that potential impact on winter navigations and migratory species would be cross-border and need to be considered as such. For all energy extraction areas in the Gulf of Bothnia, the marine spatial plans states that the coexistence of shipping may require adaptations and that conditions for winter navigation need to be taken into account. The knowledge on how offshore wind energy affects ice formation, conditions for icebreaking and winter navigation is still developing, and has to be taken into account for specific areas in the permitting process. As for salmon, SwAM will follow the research and knowledge development.

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		growth potential also in the Bay of Bothnia region.	
18.4	The Regional Council of Lapland	The Regional Council of Lapland thanks for the opportunity to comment on Sweden's amended marine spatial plans. Solutions in Swedish sea areas can have significant synergies with the regional structure, accessibility, environment – including shipping, security of supply, national defence and ecological and regional development links in Finland, especially in Lapland. These effects may also have a knock-on effect on Sweden	SwAM takes note of the comment.
19.1	The Government of Åland	Feels that the marine spatial plans aim to strengthen ecosystem services and resilience, in addition to traditional nature protection, which is gratifying. This holistic perspective is valuable and can serve as inspiration for the revision of Åland's own maritime spatial plan. Special attention to areas of high natural value is an important step in taking into account the sustainability of the sea at a time of climate change.	SwAM takes note of the comment.
19.2	The Government of Åland	Reiterates the importance of cross-border cooperation and information exchange in the marine spatial planning process. The Government considers that the Swedish Agency for Marine and Water Management has laid a solid foundation for this in the proposed marine spatial plans. In the further work, a deeper collaboration is needed to achieve a sustainable and coordinated management of our shared sea basins, as well as to deepen the knowledge of cumulative effects. The Government is in favour of continuing to participate in the development of comprehensive planning from a sea basin perspective and is happy to cooperate further with the relevant authorities in Sweden and Finland.	SwAM takes note of the comment. SwAM welcomes further cooperation with the Government of Åland.

3.4 Germany

Comments related to defence matters are not included in the table, but are referred to Government for further consideration.

ID	Respondent	Comment	Response (SwAM)
20.1	Federal Maritime and Hydrographic Agency (BSH)	The explanations in the proposal document on transboundary impacts are unfortunately very general and without any concrete statements on possible impacts on neighbouring countries. With regard to the wind energy plans for Finngrunden in the area of the Gulf of Bothnia, possible major negative impacts are predicted, particularly for migratory birds. It would be beneficial to understand what specific measures are planned to avoid or minimise these impacts. A high risk of negative effects is also identified for the planned energy areas in the Skagerrak/Kattegat due to important migration routes for birds and bats. Cumulative negative effects are also identified for the harbour porpoise in the northern and southern parts of this marine area. Again, it would be valuable to understand the planned measures to minimise the predicted negative effects through wind farms in this area.	Possible mitigation measures are included in chapter 2 (of the Impact assessment document) for all ecosystem components for the stages of building, operation and decommissioning. In addition, section 7.4 includes information on technological choices for construction, operation and decommissioning to avoid negative environmental impacts. The specific regulating mitigation measures will however be set in each permit for each offshore wind establishment. It is not known at the planning stage what applications there will be, and what technology and design that will be used.
20.2	Federal Maritime and Hydrographic Agency (BSH)	As the plans in the Skagerrak/Kattegat in particular could also affect German marine areas, we request a more detailed discussion of possible cross-border impacts and the implementation of mitigation measures at subsequent planning levels and at project level. We would welcome an early consultation and bilateral exchange on this.	SwAM takes note of the comment. There are separate procedures for municipality comprehensive planning as well as for specific projects for the establishment of offshore wind. If there are potential environmental cross-border impact, the procedure for the specific permitting process includes Espoo notification and consultation at municipality or project level.
21.1	State Agency for Agriculture, Environment and Rural Areas	Since the potential impacts associated with offshore energy production, particularly on EU bird protection areas and areas of Community importance, are thus eliminated within the jurisdiction of the State Agency for Agriculture, Environment and Rural Areas (StALU) of Western Pomerania as the competent authority for nature conservation, the interests of the aforementioned agency are not indirectly affected by the amendments to the Swedish spatial planning plans.	SwAM takes note of the comment.

3.5 Latvia

ID	Respondent	Comment	Response (SwAM)
22.1	Ministry of Transport of the Republic of Latvia	According to the decision of the Swedish government, the intention to build offshore wind farms in the Baltic Sea has been rejected and the intention in Skagerrak is allowed. Considering mentioned the Ministry of Transport of the Republic of Latvia concluded the State Joint Stock Company “Latvia State Radio and Television Centre” electronic communications network infrastructure – the optical sea cable Ventspils – Gotland (Fårösund) route in the Baltic Sea is not affected. If, however, the public consultation results in an agreement on the deployment of wind farms in the Baltic Sea areas off Gotland Island, then for the development of construction projects and the performance of construction work the performer of the project shall inform the State Joint Stock Company “Latvia State Radio and Television Centre” and receive the technical regulations as well as agree on the necessary measures for the protection of the sea cable	SwAM takes note of the information. Information will have to be provided at a project-to-project basis in Espoo-consultation for Baltic Sea projects.

3.6 Norway

ID	Respondent	Comment	Response (SwAM)
23.1	The Norwegian Coastal Administration	Has no comments for the hearing, but would like to be briefed in the further process	SwAM takes note of the comment.
24.1	The Norwegian Ministry of Energy	Has no comment on the hearing, but requests to be heard in the further process.	SwAM takes note of the comment.
25.1	The Norwegian Water Resources and Energy Directorate	The Norwegian Water Resources and Energy Directorate (NVE) has, on behalf of the Ministry of Energy (formerly the Norwegian Water Resources and Energy Directorate). The Ministry of Petroleum and Energy), identified offshore wind areas for further investigation in Norwegian sea areas. The work has been carried out in collaboration with a directorate group consisting of seven directorates, where other academic environments and agencies have contributed with knowledge support. The NVE wishes to draw attention to the fact that no similar areas have been identified on the Norwegian side of the border in the Skagerrak, due to a high level of conflict compared to other areas in Norwegian waters. We refer to our website for further information about the assignment and the identified areas for further investigation in Norwegian sea areas. We want to follow the process.	SwAM takes note of the information.

3.7 Poland

ID	Respondent	Comment	Response (SwAM)
26.1	General Directorate for Environmental Protection	In the opinion of the General Directorate for Environmental Protection (hereinafter: GDEP), the removal in the 2025 Plan Amendment of 13 areas designated for energy generation has eliminated a number of risks to marine wildlife in the Baltic Sea, associated both with the construction phase of offshore wind farms and their subsequent operation. This is of particular importance in light of the decision to abandon the development of wind farms in areas indicated in the previous version of the document — Ö255, Ö269, and Ö256 — which could have had significant impacts on species protected within the Polish Natura 2000 areas.	SwAM takes note of the comment.
26.2	General Directorate for Environmental Protection	The Natura 2000 site Hoburgs bank och Midsjöbankarna — SE0330308 (Ö254) is of particular significance for the protection in Poland of two species: the harbour porpoise (*Phocoena phocoena*) and the long-tailed	SwAM takes note of the comment.

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		duck (*Clangula hyemalis*). Within this site, additional uses such as energy transmission, maritime navigation and industrial fishing (Ö258) were foreseen. However, the 2025 Plan Amendment indicates that, due to the high natural value of this area, its primary use will relate to nature conservation	
26.3	General Directorate for Environmental Protection	The document assessing the impacts of the 2025 Plan Amendment addresses potential environmental effects within the Gulf of Bothnia, the Baltic Sea and the North Sea separately. The authors of the document identify several bird migration routes of global importance. The development of offshore wind farms in so-called migration bottlenecks (Öresund, Kalmarsund– Öland–Gotland and Södra Kvarken) presents a particularly high risk, not only for seabirds, but also for terrestrial birds and bats seeking the shortest crossing over the sea. However, the environmental impacts of the planned wind farms in the Gulf of Bothnia and the North Sea were not analysed in the context of their effects on species — both birds and mammals — associated with the Baltic Sea.	The potential impacts on migratory birds and bats have been assessed at plan level, but also the relevance of neighbouring areas have been considered. The Swedish Environmental Protection Agency, University of Lund and The Swedish University of Agricultural Services have been involved as experts in the environmental assessment.
26.4	General Directorate for Environmental Protection	In the opinion of the Polish Party, the inability to exclude significant environmental effects for specific offshore wind farm locations imposes an obligation on those conducting environmental impact assessments to apply the precautionary principle and to take early-stage decisions to abandon the designation of areas where the implementation of projects could result in significant negative environmental impacts.	SwAM takes note of the comment. The proposal submitted to the government is based on an integrated process that includes the planning as well as the impact assessment. The result of this integrated process is presented in the proposed plan document. In some cases, tentative areas for energy extraction have been removed in the planning process due to their potential environmental impact if realised. In other cases, areas for energy extraction that may have significant environmental impacts especially if established together with other areas are included in the plan proposal. The role of the SEA is to inform the Government about the potential significant environmental impacts at the strategic planning

ID	Respondent	Comment	Response (SwAM)
			level. The decision-making authority can exclude more areas based on the information of the SEA-report or let the final more detailed assessment of environmental impacts be carried out at project level.
26.4	General Directorate for Environmental Protection	As emphasised in previous submissions of the Polish Party, the analysis of cumulative impacts at the stage of the overall Swedish Marine Spatial Plan provides an opportunity, for example, to plan wind energy locations in such a way as to maintain the integrity of migration routes and to exclude locations that would negatively affect areas important for breeding or overwintering. At the implementation stage of individual offshore wind farm projects, conducting such analyses by investors and abandoning wind farm projects in locations particularly harmful to migrating species is not possible.	Considerations to risks of impacts for migrating birds are considered in Swedish MSP, but more detailed assessments of such impacts will additionally be carried out as part of project proposals environmental impact assessments. The decision- making authority should take such information into account in the permitting process.
26.5	General Directorate for Environmental Protection	Comments regarding inconsistencies between marine spatial plan provisions had previously been raised in the positions of the Polish Party dated 19 February 2024 (ref. DOOŚ-tos.442.16.2022.JA6) and 15 November 2024 (ref. DOOŚ-TSOOŚ.442.16. 2022.JA10). In its response dated 17 October 2024, the Swedish Party declared its intention to initiate discussions on this matter. I kindly request a written response to the comments set out in this letter and its attachments, as they constitute an integral part of the position of the Polish Party. At the same time, I would like to inform you that, following the adoption of the Plan Amendment, pursuant to Article 11(2) of the SEA Protocol1, the Polish Party requests that the adopted plan be transmitted together with a summary document indicating how the comments submitted by the Polish Party during the transboundary consultation process were taken into account 2. I would also kindly request that the decision on the adoption of the plan and the summary document be provided in Polish translation, in order to allow both the public and authorities in Poland to become acquainted with them.	The request has been noted for the further process.
27.1	Maritime Office in Gdynia	With reference to the statement ref. DOOŚ-tos.442.16.2022.JA13 of 7 May 2025 in the case in question, the Director of the Maritime Office in Gdynia would like to inform you that	The shipping routes according to plans are based on current national interests at the

ID	Respondent	Comment	Response (SwAM)
		he maintains the observations made in his letters ref. INZ1.9202.10.1.2023.AC of 5 January 2024 and INZ1.9202.10.2.2023.AC of 12 November 2024 concerning the lack of consistency as regards shipping routes between the Swedish draft amendment to the plan and the existing (and internationally consulted) spatial development plan for the Polish Maritime Areas. The drawing of the draft plan in Ö254 indicates the 'Shipping' route through the Southern Central Bank (Södra Midsjöbanken) - Ö248. On the Polish side, the area of the Central Bank is designated in the development plan for the functions of 'renewable energy extraction' (POM.60. E) and 'exploration and exploration of mineral deposits and extraction of minerals from deposits' (POM.61. K). It is planned that after the construction of wind farms in the POM.60. E basin, the usual route to the ports of Lithuania and Latvia will run through the POM.52. T basin (south of the farms). The lack of consistency between the Polish and Swedish plans in this respect may result in a serious threat to the marine environment (collisions of ships with wind turbines).	time. If a shipping route have to be relocated due to construction of wind farms in the area, the plans will be updated in the next planning process accordingly.
27.1	The Ministry of Infrastructure	Points out the lack of consistency between the Polish and Swedish plans for shipping routes, which may result in a serious threat to the marine environment. Explanation is required: 1. What is the status of the waters shown in the drawing of the Swedish plan as 'maritime shipping', i.e. whether it is the establishment of the plan (these areas have neither the lettering nor the number of the basin) or the conditioning (i.e. an illustration of what the current traffic situation looks like). 2. If 'maritime navigation' waters constitute a plan setting out why the waters intended for navigation are not consistent with the routes indicated in Poland's (and internationally consulted) spatial plan for internal marine waters, territorial sea and exclusive economic zone at a scale of 1:200 000. In the drawing of the plan in the area of Ö254, the shipping lane (so-called maritime navigation) leading through the Southern Central Bank (Södra Midsjöbanken) - Ö248 is indicated. On the Polish side, the area of the Central Bank is designated in the development plan for the functions of 'renewable energy extraction' (POM.60. E) and 'exploration and exploration of mineral deposits and extraction of minerals from deposits' (POM.61. K). It is planned that after	The shipping routes according to plans are based on current national interests at the time. If a shipping route has to be relocated due to construction of wind farms in the area, the plans will be updated in the next planning process accordingly.

ID	Respondent	Comment	Response (SwAM)
		the construction of wind farms in the POM.60. E basin, the usual route to the ports of Lithuania and Latvia will run through the POM.52. T basin (south of the farms). According to the Directive establishing a framework for maritime spatial planning (Directive 2014/89/EU), countries cooperate to ensure that maritime spatial plans are coherent.	

-----end document