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NV-03035-14 Fehmarnbelt

## Comments on the revised referral of fixed link across the Fehmarn Belt

The referral was reviewed in terms of taking into account the comments sent earlier (The Swedish Institute for the Marine Environment (Havsmiljöinstitutet) views on the consultation document on "Consultation under the Espoo Convention on Environmental Impact Assessment for the fixed link across the Fehmarn Belt" Reference No. 6/14).

### Monitoring program to determine the redistribution of sediments

In earlier comments the Swedish Institute for the Marine Environment assumed that a monitoring program would be designed to determine if the redistribution of sediments exceeds the amounts declared.

*We see the following changes /additions to the document "Annex 1 to the consultation paper pursuant to Articles 8 and 9 EIA Act (UVPG)" compared to earlier referral round 2014.*

**Page 202/447:** A monitoring program will be designed to monitor the re-creation of habitats on the seabed, "Verification of the natural refill of the tunnel trench and the reproduction of the prior habitat is all part of the planned monitoring program in the Marine area (plan Approval Document Attachment 22.9)."

**Page 331/447:** The same monitoring program is mentioned on this page.

**Page 374/447:** A list of marine operations and the surveillance program mentioned: "Verification of the natural refill of the tunnel trench and the reproduction of the prior habitat is all part of the planned monitoring program in the marine area (Plan Approval Documents 22.9)."

*We do not see any changes /additions to the document "Annex 2 to the consultation paper pursuant to Articles 8 and 9 EIA Act (UVPG)" compared to earlier referral round 2014.*

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### **Minimizing the impact on the western cod stock in the Baltic.**

The Swedish Institute for the Marine Environment further stated the importance of minimizing the impact on the western cod stock in the Baltic Sea and argued that the criteria of the Marine Directive (2008/105/EC) must be fulfilled.

*We see the following changes/additions to the document "Annex 1 to the consultation paper pursuant to Articles 8 and 9 EIA Act (UVPG)" compared to earlier referral round 2014.*

**Page 362/447:** "Impairments to fish caused by footprint or habitat loss or from solid substrate ... The constitutional loss or impairment Primarily Affect shallow water fish communities/species, including the life stages of the species which use shallow waters (e.g. the areas where cod and flatfish bring up their young). Overall, the impacted areas make up a proportionately small share of the areas of shallow water in the Fehmarn Belt."

*We do not see any changes/additions to the document "Annex 2 to the consultation paper pursuant to Articles 8 and 9 EIA Act (UVPG)" compared to earlier referral round 2014.*

**The Swedish Institute for the Marine Environment want to express that we consider the content and changes to be well-made and well-motivated. We have no further comments.**

The Swedish Institute for the Marine Environment is a collaboration between the University of Gothenburg, Stockholm University, Umeå University, the Swedish University of Agricultural Sciences and Linnaeus University.

*Yours sincerely,*

***Kajsa Tönnesson, Director***

***Swedish Institute for the Marine Environment***