

Regarding article: EU 'Fit for 55' is unfit and unfair

<https://eeb.org/eus-fit-for-55-is-unfit-and-unfair-ngos-say/>

Even the so-called "Renewable" energy is inappropriate and unfair, neither sustainable nor climate-friendly.

Not even in Sweden, despite claims by "environmental politicians" and "environmental organizations".

Brussels makes decisions without a scientific risk analysis and is governed by lobby organizations. There is a great risk that the Union will implode and stagnate while other economies chooses more efficient and sustainable paths.

Commission Decision (2020) on a 25-fold increase in wind power without scientific risk analysis by clear facts, can have fatal health, environmental and economic consequences. Unfortunately produced under the leadership of a Swedish EU parliamentarian. A large proportion of offshore wind power in the North Sea, Skagerrak and Kattegat can have serious ecological effects and cause dehydration and groundwater shortages over land (Keith-Miller).

The plans in Sweden are just as grotesque and harmful. An 8-fold increase from 23 TWh to 100 TWh onshore and 90 TWh offshore wind power. Of this, about 70 TWh to cope with the transition to hydrogen-based steel production, hydrogen otherwise, international taxfree IT-server halls and battery production in northern Sweden. Plus about 25 TWh for electrification of the transport sector.

Local organizations (15) have sent to the Swedish government, parliamentary parties (8), members of parliament (299) and EU parliamentarians (16) an attached letter with facts about the risks of the industrial plants' emission of noise, infrasound, turbulence, ground vibrations, nanoparticles, etc.

Demands have been made on a moratorium on risk analysis of the destructive effects on public health, welfare systems, ecosystems, biodiversity and the important basic industries.

We are already seeing increased political interest with 5 troublesome interpellations about wind power in the Parliament to the country's Minister of the Environment. Individual members of the Parliament state that "it has gone too far" (enough is enough) and that they promise to pursue these issues within the party's parliamentary group.

The motives for the moratorium are convincing and challenge the basic EU policy values, several EU directives and international conventions.

The effects are so fatal that, in the worst case scenario, they could jeopardize the future of the European Union development towards a healthy and sustainable community.

European Commission wind power plans

- **opposes the EU strategy "Fit for 55" for the restoration of biodiversity by 2030.**

The EU sets out stricter mandatory measures for biodiversity to recover by 2030;

- states should designate **additional protected and strictly protected areas** (<2021)
- **establish ecological corridors** to prevent genetic isolation, facilitate the migration of species and preserve and improve well-functioning ecosystems
- new EU plan for the restoration of nature
- ensure (<2030) that there is no deterioration in conservation trends and status
- ensure that at least 30 % of all species and habitats reach favorable status

These urgent goals must be prioritized and ensured before other land uses are allowed.

- **forms pulsating noise mats with infra- and low-frequency noise over large areas that cause ill health, pathological effects on the brain (gray matter), heart sac, lung tissue, blood vessels and glial cells that support the function of nerve cells.**

Depressive effects are significantly correlated with the start-up of wind turbines (Suicide. Eric Zou. 2016). Current industrial facilities can be considered as uncontrolled medical clinical trials. Studies based on electromagnetic resonance imaging technology show reduced brain substance in the hippocampus and vital brain areas. Probably because the extremely small blood vessels are affected by the vibrations so that the vessel walls thicken and the nutrient supply decreases. Some types of glial

cells that surround the nerve fibers and supply nutrients are sensitive to pressure changes. Primary statistics indicate risks of increased association with vascular dementia and must be validated. These threats must be evaluated by independent medical experts. The European Commission has the burden of proof and the obligation to protect the citizens of the Union and, if necessary, reconsider energy and climate policy.

- **causes an unhealthy and developmentally disruptive upbringing environment in violation of the UN Convention on the Rights of the Child.**

All forms of noise disturbance are hazardous to health during longterm exposure. Women are affected earlier than men. Body organs, brain and our eight perceptible senses are not developed until at the age of 12. Obstructing children's cognitive and social skills is an unforgivable selfharming behavior, with the European Commission bearing the ultimate responsibility.

- **spreads about 50 kg of nanoparticles and microplastics/turbine and year. Of which about 30 % extremely toxic and endocrine disrupting Bisphenol which is released and gradually reaches the food chain.**

Nanoparticles act as the "Trojan horse" and bind Methylmercury, PFAS and heavy metals that reach the blood/brain barrier. May affect plankton and the global CO₂/oxygen balance. Norwegian report and letter to ECHA Helsinki added.

The European Commission has taken strong measures to stop the emission of plastic nanoparticles as soon as possible. Wind power's emissions of nanoparticles are greatly underestimated, as are their high levels of the poison Bisphenol and their ability to bring other toxins into the body. The toxins accumulate in a small area for 20-30 years. The European Commission has an obligation to intervene. The Norwegian material is reported in the appendix. New material (lignin) can replace BPA, but the poison is already present in nature and the "Trojan horse" effect continues.

- **based on incorrect regulations, calculation and measurement models. The European states do not respect the WHO Guidelines for European Environmental Noise 2018, which**

- unequivocally rejects dBA as a measurement standard
- Preliminarily states that noise above 38.5 dBA causes "adverse health effects"
- calls on the European states to draw up new regulations in cooperation with the healthcare sector.

The European states' disrespect for the WHO Guidelines for European Environmental Noise 2018 is depressing. The regulations clearly show that the cynical and deliberate darkening of lowfrequency noise is a danger to society. Even worse are the hundreds of times heavier pulsating pressure waves in the infrasound area. The German specialist medical organization **Ärzte für Immissionschutz** states a healthy noise level of 60 dBZ or **10 km for one single turbine.**

They have in an "Open letter" warned the federal government. In clinical follow-up, Stephan Kaula has warned that the country may consist of "tired, irritated and sick" people.

Increasingly taller turbines emit harmful amplitudemodulated sound over 3.5 km, inside dwellings over 20 % of time (Zajamsec et al).

The European Commission should reconsider the legitimacy of wind power in the European cultural landscape.

- **causes lawlessness through 20-40 % lower property values <2 km, which gradually decreases towards 6 km.** (Swedish study 2021).

If the buyers had insight into the health impact of infrasound, they would have refrained from buying. Intrusion, loss of disposal, slumber and depopulation. Swedish study attached.

The European legal system is unfair. Human rights must regulate the relationship between state power and individuals. They constitute a limitation of the state's power over the individual and at the same time establishes obligations for the state towards the individual.

The European Commission should be held accountable for the measures they intend to take to comply with their own regulations.

A clear position has been taken by The Global Network for Human Rights and Environment in the document Declaration on Human Rights and Climate Change.

<https://gnhre.org/declaration-human-rights-climate-change/>

The European Commission should ensure the reindeer husbandry's right to ancient pastures. The issue can also be examined by the UN within the framework of the Aarhus Convention.

- **causes indirect climate effects, increased emissions of CO₂ and methane from wetlands and humus (soil vibrations) and reduced capture of CO₂ through disturbed symbiosis and photosynthesis.**
- **causes local (0.3-3.5 C⁰) and regional temperature rise (0.3 C⁰). (Keith-Miller).**
- **causes local drought through blocked dew formation at night and regional drought through reduced precipitation when offshore turbines condense moist air raining in the ocean (Keith / Miller).**

Wind power accelerates the climate effects and emissions of greenhouse gases during the critically initial 10-year phase, while the effects of reduced fossil-based greenhouse gases do not yield results until the end of the century. Research stations in northern Sweden show that forests already have greater emission of greenhouse gases than the ability to recapture them in the biomass. Probably changed composition of microorganisms in the humus layers. The indirect climate effects are greatly underestimated or in the worst case darkened.

30 % of German spruce forests are dead due to drought and insect damage. The effects of the massive investment in offshore wind power must be validated.

The EU report *Road to EU Climate Neutrality by 2050 Spatial Requirements of Wind/Solar and Nuclear Energy and Their Respective Costs*, shows that nuclear power is both cheaper, less space-consuming and more environmentally friendly than other energy alternatives.

The Western world consumes three times more resources than it has in its territories and uses grain as fuel in a starving world.

- **causes major damage to ecosystems and biodiversity.**
 - does not respect EUROBAT2015.
 - does not cover the implementation of the EU specific directive for capercaillie protection, 2017, **EU-Birds Directive - Annex I, II & III, Tetrao urogallus**, which states that the minimum area required to maintain a viable isolated population of about 450 individuals is 250 km². These areas should be distributed by county before land use is allowed for wind power.
- **counteracts 6 national environmental goals and the generational goal is made impossible.**
- **counteracts important Agenda2030 goals.**

High death rates from natural predators; bats, swallows, swifts, capercaillies, grouses and birds of prey. Barrier effects kill migratory birds and habitat loss displaces species. Studies show that disturbing sounds cause hormonal changes and weight loss.

The EU has delayed EUROBAT2015. Requirements for national regulations only in 2024.

Christian Voight found 300,000 dead bats at wind turbines already in 2014 and warned of an ecological crash. The current provisional rules are embarrassingly symbolic and allow the killing and injury of large numbers of animals (7 individuals/turbine and year), which should be considered intentional killing.

Badgers that live within 1 km of wind turbines have 2.6 times higher cortisol in their blood than those that normally live beyond 10 km. Forest birds and waders gradually disappear from the area. Even moose disappear. Noise disrupts the codfish's communication, causing smaller numbers of rum grains and smaller size of its fry.

- **based on incorrect calculations.**

Wind power does not bear costs for power grid expansion, area losses, reserve power and necessary storage systems.

Nor costs for restoration. Foundations (2000 tonnes of concrete, 80 tonnes of rebar), cables, geomats and oe meter thick, hardpacked macadam areas are allowed to remain in the ground as an eternal

landfill. The excavations of the road systems in heights and wetlands are irreparable. Recycling of used rotor blades is not yet solved.

- **hampers the profitability of the basic industries of forestry, agriculture, fishing, reindeer husbandry and tourism with negative spin-off effects on service sectors and public activities.**

Wind power also does not bear indirect costs for negative climate impact and public health, increased burden on society's welfare system, impact on ecosystems and nature's growth, citizens' personal economic losses and reduced productivity in the basic industries. Likewise, the obscured environmental consequences of producing cheap neodymium, which causes leakage of radioactive sludge to river systems and serious ill-health for workers in China and South Africa. These costs are not included in the EU report Road to EU Climate Neutrality by 2050. The real costs of wind power can be threefold or contain unpredictable variables that are economically consuming on society.

- **inhibits disposal and alternative land use, which leads to negative rural development and slump.**

Destructive degradation of previous generations' legacy, which makes positive development impossible for future generations.

- **is largely run by companies based in tax havens.**

Tax Justice Network - Norway has mapped the ownership of Norwegian wind turbines in operation in the report *The shadow sides of wind power - Measures against profit shift and hidden ownership*. Attached (In norwegian).

<https://taxjustice.no/artikkel/skatteparadis-i-norsk-vindkraft?fbclid=IwAR2dOhr3QRaYtRcnW9YuowNFv5r2n0EUpBR5pJ-oik6ggvLRLAwSpwUJ2c>

The report shows that seven of the ten largest owner companies can be linked to tax havens, either through ownership structure or financing (Luxembourg, Cayman Islands, Switzerland, the Netherlands, the Jersey Islands, etc). In total, 42 % of Norwegian wind power production can be linked to tax havens. For some wind power companies, the owners were impossible to report because the tracks remained in tax havens. The report reveals that there is a high risk of a profit shift in Norwegian wind power and that the tax rules have many gaps that make it possible to transfer large revenues abroad. Conditions should be the same within the EU.

Requirements must be made for the European Commission to take measures to

- companies and investors can not take advantage of shortcomings in the legislation and "disappear" in tax havens, while the tax bill is handed over to citizens suffering from ill health and personal financial losses.
- transparency regarding ownership and group structures when applying for environmental permits and sales of environmental permits and blocking of tax-evading companies
- transparency regarding financial accounting and financing in order to eliminate profit shifts, tax evasion, corruption and money laundering.

- **Contributes to geopolitical shift.**

The Chinese dictatorship and the oppressor of human rights carry out a consistent exploitation of the Swedish and European cultural landscape and environment.

The European subsidiary of state-owned China General Nuclear Power Corporation (CGN) accounts for almost one-fifth of the expansion of Swedish wind power 2017-2022.

The company is blacklisted in the United States when they were convicted in court as early as 2017, of having stolen American nuclear technology for military use. Acts in the umbrella organization Swedish Wind Energy and their debate posts. The company also operates in the UK and France. Well aware that windpower have a destructive impact on people and the environment, while they themselves, together with Russia, are leaders in the development of SMR reactors and recycling of nuclear waste.

For those who understand Scandinavian, there are the following tragic testimonies from victims on Youtube and which are telling evidence of the central government's abuse;

Anna <https://www.youtube.com/watch?v=pjHiHyGoJ34>

Ellinor <https://youtu.be/NfQEw8haRPc>
Elisabeth https://www.youtube.com/watch?v=aLcpill_8qA
Barbro https://www.youtube.com/watch?v=5_BtaA_5RO0&t=201s
Ulla Heine. Doctor. The health group Rättvisa vindar Norra Östergötland. Summary.
<https://www.youtube.com/watch?v=GWm8c0BZIZQ>

This is the case throughout Europe. Confidence is diminished by the supremacy of the supranational state for the citizens' complaints, which in many cases are pure torture and pure hell that cannot be left behind.

4,300 turbines have already spoiled large areas. <https://vbk.lansstyrelsen.se/>

The Swedish state has now quoted the planned expansion to 100 TWh per county, with the task of "scraping" the remaining areas up to a harmful 800 m from homes. Without first implementing the EU's urgently needed measures to restore biodiversity by 2030. Which means establishing relevant protection distances between wind turbines and national parks, national interests for nature conservation and recreation, Natura2000 areas, protected biotopes, hiking trails, bathing sites, tourist centers, UNESCO biosphere reserves, resting and wintering areas for migratory birds (golden eagles, etc.), as well as valuable landscape and cultural environments. Today, the turbines can be placed close to the border to the "protected" areas. Madness. Likewise, the reindeer husbandry's right to ancient pastures and the implementation of the EU-Birds Directive - Annex I, II & III, Tetrao urogallus. The Swedish Society for Nature Conservation contributes to misleading information in the report *Wind Power - An important part of the energy system of the future* and claims a five-fold increase. From 27 to 137 TWh. Unproven claims:

- ✓ *available area is only 1%*. Cynical underestimation. Based on the spread of infrasound, almost the entire country is utilized, as the energy pulses reach all the way into the larger central cities. Based on the German state of Bavaria's standards of 10 * H, only a few percent of the land area remains in southern, central and large parts of northern Sweden.
- ✓ *wind power is competitive*. Incorrect calculations. Indirect systemic, health, environmental and economic effects not included.
- ✓ *wind power has a low climate impact*. Indirect effects not included. Higher CO2 emissions and less feedback through disturbed symbiosis and photosynthesis. Poisonings pose a global threat to the CO2/oxygen balance.
- ✓ *can be built in many different places*. Incorrectly. Emission of infrasound, low-frequency noise, ground vibrations and turbulence are a heavy burden on the population.
- ✓ *new nuclear power, which causes hazardous radioactive waste and requires uranium mining*. Incorrectly. Russia operates a reactor that uses recycled uranium waste and China is scaling up the technology. Several countries are developing technologies that can utilize residual waste with a potential for 10,000 years. The trend is towards Small Modular Reactors, in which the Swedish companies Vattenfall and Fortum participate and the state distributes grants of SEK 50 million. The KTH project Blykalla is suitable for hydrogen production. China will launch the world's first thorium reactor this year. The Danish state is a partner in the development company Seaborg, which is developing a nuclear reactor technology for ships.
- ✓ *Germany, with ten times as high a population density as Sweden, has the most installed wind capacity in Europe with close to 50,000 MW*. Cynical comparison. Germany has over 1000 local resistance groups fighting for their survival.
- ✓ *Sweden has good wind resources and a relatively sparsely populated area, which makes it possible to cope with the energy conversion through a strong wind power expansion*. Incorrectly. Today, it is no longer a question of a marginalized rural population. It is about a historic state and supranational takeover of the living space and intrusion all the way into bedrooms, brains and body organs.
- ✓ *The total climate impact of wind power, which mainly occurs during the production of wind turbines, is lower than for other electricity production (IPCC, 2014)*. Wind power is, with the correct location, thus the most sustainable type of energy. IPCC 2014 is not relevant 2021.

✓ *The report also highlights the positive aspects and opportunities of wind power in the form of climate and societal benefits.* Incorrectly. The report does not address the somatic, pathological and psychological effects on citizens and welfare systems at all. Or the children's vulnerability during the first 12 years of their upbringing. Or the dBA scam clarified by the WHO Guidelines for European Environmental Noise 2018. dBA is a filtered value that excludes all pulsating infrasound, which means that an increase of 10 dB (unfiltered) is only reported as 0.2 dBA. The source noise of the turbines has increased from about 104 to 115 dBA in 10 years. They will soon reach grotesque heights of 300 m on land and 350 m at sea. The inaudible pulsating energy pulses at 1 Hz "hit like a hammer" on the heart according to Christian-Friedrich Vahl, University of Mainz. He found that heart muscle fibers lost 20 % of their power when exposed to infrasound.

Nor is the impact on animals and ecosystems and the urgent need for biodiversity restoration mentioned, which must be given high priority. Etc.

The Swedish Society for Nature Conservation has large financial support from the Swedish government and participates in debate posts together with actors who represent wind power.

The association's actions support continued international land grabbing, where the country's and the union's cultural areas are transformed into industrial areas and objects of financial speculation.

Often by invisible finance companies in distant tax havens. Or the dictatorship of China.

Many historical cultures have not survived the overexploitation of the available ecosystems.

The crisis insight regarding the coming imbalance through the energy transition in northern Sweden is obvious. Likewise, the insight into the destructive effects of wind power. Even among politicians within the now government-forming party.

Our ambition is for the government and the Parliament to decide on a moratorium and initiate a democratically controlled process for risk analysis of the destructive effects of wind power on the climate, public health, welfare systems, ecosystems, biodiversity and the national basic industries.

Led by a Parliamentary Commission with the participation of independent experts and representatives of nongovernmental organizations (public). With the support of current legislation:

- Chapter 2, 2-31 Miljöbalken (the Environmental Code). Regarding knowledge requirements, caution and the best possible technology
- Chapter 6. Miljöbalken (the Environmental Code). Environmental assessments.

§ 2 *In this chapter, environmental effects refer to **direct or indirect, positive or negative, temporary or permanent, cumulative or non-cumulative** and which arise in the **short, medium or long term** on the environmental aspects;*

- *population and human health*
- *animal or plant species that are protected according to ch. MB and biodiversity in general*
- *land, soil, water, air, climate, landscape, buildings and cultural environment*
- *the management of land, water and the physical environment in general*
- *other household with materials, raw materials and energy, or*
- *other parts of the environment*

§ 3 *An authority or municipality that draws up or amends a plan or program required by law or other statute shall make a strategic environmental assessment, if the implementation of the plan, program or change can be assumed to have a significant environmental impact.*

- Climate Act 2 §; *The government will conduct climate policy work that*

1. *aims to prevent dangerous disturbances in the climate system,*

2. *helps to protect ecosystems as well as current and future generations from harmful effects of climate change,*

3. *is focused on reducing emissions of carbon dioxide and other greenhouse gases and preserving and creating functions in the environment that counteract climate change and its harmful effects, and*

4. ***rests on a scientific basis and is based on relevant technical, social, economic and environmental considerations.***

These legal requirements are subject to EU directives and also apply to the parliamentarians of the Union. The European Commission's decision on a 25-fold increase in wind power lacks a scientific risk analysis of the sustainability aspects reported here and which could lead the Union into a gradual stagnation. This shortcoming also applies to the Commission's handling of the taxonomy, where solar and wind power are designated in advance as sustainable technologies without the detailed requirements imposed on other technologies. A decision blindly. While modern nuclear power is blocked on political dogmatic grounds, despite the fact that according to the EU's own scientific analysis it has been found to be fossil-free, climate-friendly, cheap, surface-efficient and can take care of and reuse its own waste in a sustainable and safe way.

EU wind power plans are based on substandard decision-making. This can be facilitated by giving the new EU institution ECCC (European Climate Change Council) the task of investigating destructive effects of wind power. The potential threats to public health and welfare systems are extremely alarming.

With the hope that the EEB steps up for an objective parliamentary process based on scientific facts.

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Joined to
the Swedish Landscape Protection Association, and
EPAW, the European Platform Against Windpower
with over 1600 local acting organisations