



7.4.2022

Norwegian Environment Agency  
Mari-Lise Sjong  
[mari.lise.sjong@miljodir.no](mailto:mari.lise.sjong@miljodir.no)

Notification by Norway on 4 February 2022

## **Answer to the notification in accordance with Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) for a planned extension of cabin villages in Nuvvos ja Baišjohnjálbmi**

The Ministry of the Environment acknowledges that Finland received a notification from Norway concerning the environmental impact assessment procedure (EIA) of a planned extension of cabin villages in Nuvvos ja Baišjohnjálbmi in Karasjok municipality. The developer of these two projects is Nuvvos Panorama Invest AS. Included in the notification were two planning programmes. The original deadline for Finland's answer was postponed until 7 April due to the translation of the planning programmes (scoping documents) into Northern Sámi to enable the public hearing.

The Ministry of the Environment gave the opportunity for the public and the authorities to comment on the material from 23 February to 31 March 2022. The material was displayed on the Ministry's website. Thirteen answers were received. The given statements are enclosed to this letter and should be considered in their entirety.

Based on the received comments, and reflecting its own views, the Ministry of the Environment states that Finland will participate in the EIA of the projects. Participation is supported by the Sámi Parliament, the Centre for Economic Development, Transport and the Environment in Lapland, the Municipality of Utsjoki, the Regional Council of Lapland, the Sámi Museum Siida, Metsähallitus (Forststyrelsen), the Tana Fishery Region, the Outakoski Water Cooperative and the signed residents of Nuvvos and Dálvadas villages. The Natural Resources Institute Finland would have needed more information to decide on the participation. The Finnish Environment Institute and Reindeer Herders' Association did not see a need for participation under certain conditions. The Ministry of Agriculture and Forestry did not see a need for participation.

The developer had failed to include information from Finland in the scoping documents which clearly led to false conclusions about the transboundary impacts of the projects. It must be noted that the Finnish side of the river is nationally important landscape area as well as nationally important cultural historical environment. Such values should not be missed. The Finnish side of the



Tana valley must be included in the impact area of such projects also in the future to avoid artificial outlining.

The following description highlights the state of the environment and concerns raised in Finland related to the environmental impacts of the cabin village projects. They need to be assessed properly to conclude on the eventual significance of impacts. The EIA should also include alternatives and have an actual impact in the planning of the cabin villages. To provide ways to reduce and mitigate the negative impacts is also important.

### **Landscape, built heritage and cultural environment**

The Tana River Valley is regarded one of the most beautiful river valleys in Finland. The valley is a combination of unique nature and culture created by the Sámi that have lived by the river. The sparse and small-scale settlement follow the centuries-old settlement structure, located on both sides of the river on mild terraces. Tana valley is nationally important landscape area<sup>1</sup> in Finland since 2021. By the initiative of Utsjoki municipality the Ministry of Environment is preparing to form a nationally valuable Landscape Conservation Area (Section 32 of the Nature Conservation Act). Establishment of the area aims to nurture the natural and cultural landscape of the Tana valley and its historical characteristic features. The European Landscape Convention of the Council of Europe needs to be taken into account.

Like stated earlier, the Finnish side of the valley belongs to nationally important cultural historical environment named “Sámi settlement of Tana River Valley” (RKY 2009<sup>2</sup>). The villages Nuvvus and Dálvadas on the Finnish side belong to this area. Such status involves the preservation of existing buildings and environments and adapting any additional construction and other changes to the nature and to the characteristics of the cultural environment. More information about the area is provided in the link in the footnote.

The culture of the Tana River is coherent on both sides of the river, and the national border has not had a major impact on its cultural special features. For this reason, the cultural environment of the region and antiquities are common cultural capital. Local communities of both states must be heard in matters concerning them. (Utsjoki municipality) The planning area’s archeological heritage information must be investigated and its sufficiency and comprehensiveness assessed (Sámi Parliament, Utsjoki municipality). For information, two archeological antiquities are found in the area of Dálvadas and Nuvvus (see the statement by Sámi Museum Siida).

---

<sup>1</sup> Government decision 2021 [Tenonlaakson maisemat](#) (number 182)

<sup>2</sup> Finnish Heritage Agency (Museiverket) [Byggda kulturmiljöer av riksintresse](#), [Tenojokilaakson saamelaisasutus](#)



### **Erosion, fish and fishing**

The Tana River banks are subject to natural erosion in this area. Local observations indicate that landslides have occurred especially in the rainy summers in the past five years. In flowing waters, large erosion masses impair and destroy fish spawning habitats and hinder fishing. The Báišjohnjálbmi planning area is bordering the Dálvadas rapids, which is an important area for the survival of the salmon stock and local Sámi fishing tradition. The erosion sensitive river banks need to be mapped and protective measures planned if affected by the project. The activities in these areas shall not in any way jeopardize the river ecosystem, and the preservation of the salmon population in the Tana River and its tributaries. Building to erosion sensitive areas must, of course, be avoided.

The impacts to land use also in Finland need be assessed. Cabin villages are likely to develop ancillary functions. As the fishing values of the Tana River are significant, increased fishing may hinder the local fishing rights. Using snowmobiles for transport as well as for leisure activities can be expected to increase. These need to be included in the assessment as they have an impact on the fragile nature.

### **Sámi culture**

The Tana Valley on the both sides of the river is an old Sámi region and Northern Sámi language area. Although the Tana River is now a border river, it brings families and Sámi people together who practice traditional livelihoods. In the primary impact area on Finland's side are the villages of Aitakoski, Dálvadas and Nuvvus. Báišjohnjálbmi area is located opposite the village of Nuvvus and Nuvvos on the other side of Dálvadas. View from Aitakoski village opens to the direction of the Nuvvus-Áilegas fell, which is one of the three sacred fells for Sámi in the Tana Valley. (see statement by Sámi Parliament).

The village residents have raised concerns that such large-scale holiday housing, let alone tourism, would have a significant negative effect on the special characteristics of the area on both sides of the river. Among other things, the rich story telling tradition in the region is linked to the region's geography, such as the story tradition of Stuurra Jovvna and the sanctity of the Nuvvos Áilegas fell. (see statement of the residents of villages Dálvadas and Nuvvos)

To assess the impacts, information is needed on livelihoods practiced in the impact area, including the Sámi traditional livelihoods and their legal basis. The cumulative impacts of the project plans and overall impacts from the perspective of the Sámi culture in Tana are important to assess and take into account so that the rights of the Sámi can be safeguarded.

It must be noted that also the other issues in Finland's answer are connected with the Sámi culture even though stated under several other headings. In this



context Finland also wishes to refer to the *Good Practice Recommendations For Environmental Impact Assessment and Meaningful Engagement in the Arctic* endorsed by the Arctic Council in 2019<sup>3</sup> e.g. for the use of Indigenous Knowledge in EIA. The impact on Sámi can properly only be assessed by Sámi themselves.

### **Other issues**

The project description has to be supplemented by information on the potential to year-round use of the cabins and the long-term need for power and water system. If the cabins are used during the winter months, an alternative power source is also needed in addition to the solar power system, The estimated plan for water pipes and the amount, quality and treatment of waste water is needed in order to assess the potential impacts on the quality of water in Tana. The plan also contains no reference to the quantity, treatment and impact assessment of storm waters from the area. Information on the intended character of the cabin villages is also needed.

The cumulative impacts with a third cabin village in Fielbmajohka (all together 44 cabins), situated two kilometers north from Nuvvos, need to be assessed.

Land use plans on the Finnish side need to be considered and included in the EIA (see statements by the Lappi Regional Council and Utsjoki municipality),

The project has no foreseeable significant impact on reindeer herding (see statements by Reindeer Herders' Association, Finnish Environment Institute).

The Ministry wishes to point out the importance for the EIA documentation to address properly the transboundary impacts. In this respect a separate chapter is proposed looking at the environmental impacts from Finland's point of view. The developer should hold discussions in the area during the assessment with local residents also on the Finnish side and hold discussions with relevant Finnish authorities to support the environmental impact assessment.

The planning must respect the characteristics of the environment and to ensure the preservation of landscape, cultural historical values as well as the continuity of the Sámi culture.

---

<sup>3</sup> <https://sdwg.org/what-we-do/projects/arctic-eia-environmental-impact-assessment/>



Permanent secretary

Juhani Damski

Senior Ministerial Adviser

Seija Rantakallio

Enclosure

Statements from Finland