



11.10.2021

VN/21286/2021

Swedish Environmental Protection Agency
registrator@naturvardsverket.se
cc: Richard Kristoffersson

Notifications by Sweden (Your numbers NV-06053-21 and NV-06680-21)

Answer to the notifications in accordance with Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) regarding plans for graphite mining at sites Nunasvaara South and Niska South, Niska North, Nunasvaara North

Finland acknowledges receiving two notifications from Sweden concerning the start of an environmental impact assessment procedure (EIA) for planned projects to mine graphite at several sites in Kiruna municipality, Norrbotten county, close to Vittangi. One notification deals with site called Nunasvaara South and the other with sites called Niska South, Niska North and Nunasvaara North. As the anticipated transboundary impacts are similar and not possible to differentiate from each other, Finland is giving only one answer to the notifications, which can be used in both processes in Sweden.

Finnish Ministry of the Environment gave the opportunity for the public and the authorities to comment on the material provided by Sweden from 9 to 30 September 2021. The material was displayed on the Ministry's website. An announcement was also published in two newspapers appearing in the impact area.

Statements and views were given by the Ministry of Agriculture and Forestry, Centre for Economic Development, Transport and the Environment in Lapland, Centre for Economic Development, Transport and the Environment in Kainuu, Environment services of Tornio city (Meri-Lapin ympäristöpalvelut), Ylitornio municipality, the Regional Council of Lapland, Natural Resources Institute Finland, Metsähallitus (state owned enterprise that manages and protects state-owned land and water areas), the Finnish Association for Nature Conservation, Reindeer Herders' Association, one private person and Finnish - Swedish Transboundary River Commission.

All responses included a view that Finland should participate into the EIAs of the projects in Sweden. Based on the received comments, and reflecting its own views, the Ministry of the Environment states that Finland will participate in the EIA procedures of both projects. The following highlights some of the most important issues for the EIA.



Both projects either individually or jointly could have a significant negative impact on the ecological or chemical status of rivers Tornionjoki and Muonionjoki as well as on Bay of Bothnia during and after the operation. The effluent could have a negative impact on the representativity of those habitats of the area of special conservation measures (SAC) of rivers Tornionjoki-Muonionjoki (FI301912) why they are included in the Natura 2000 network in Finland. This may result from either changes in the water quality or through indirect impacts on species typical for the habitat or both. The rivers are the most important natural breeding and juvenile production area for salmon in the Baltic Sea basin and important also for other migrating fish.

Finland is expecting the EIA documentation to describe a sufficient project description and to include the anticipated transboundary impacts to the water ecosystem mentioned above. Especially the factors that impact water quality are of importance e.g. chemicals to be used in the processes, anticipated surplus water amount and its content, properties, treatment methods and efficiency of the treatment of effluent generated in the process. The environmental objectives of the Water framework directive and the Marine strategy framework directive should be considered.

The EIA should pay particular attention to preparedness for accidents and disasters that could be caused by extreme weather events or other exceptional situations and could may trigger significant environmental damage to the discharge water body. Also concrete mitigation measures to quickly manage the exceptional situation should be presented.

The water body is affected by a pressure from several existing and/or approved mining projects in Sweden and in Finland. Therefore the assessment of cumulative impacts from these several sources must be included in the EIA. Mining activities affecting the river basin must be planned in a way that they do not cause significant discharges and hydrological impact or in any other way adversely affect the integrity of the site Tornionjoki-Muonionjoki and its conservation objectives nor deteriorate the status of the water ecosystem.

The developer is planning to take its project forward in two parts. The provided documents however indicate that the enrichment plant in Nunasvaara South is also going to be used by Niska South, Niska North and Nunasvaara North project. Finland is drawing Sweden's attention to the EU Commission's note on ancillary projects¹ to interpret if the project should rather be viewed as a whole. Nevertheless, the EIAs should include the cumulative transboundary impacts of both projects.

¹ <https://ec.europa.eu/environment/eia/pdf/Note%20-%20Interpretation%20of%20Directive%2085-337-EEC.pdf>



The given statements and views contain many important and detailed remarks from authorities, expert institutions and the public that cannot be summarised briefly in this statement. They need to be viewed and taken into account in their entirety in the Swedish EIAs.

Permanent secretary

Juhani Damski

Senior Ministerial Adviser

Seija Rantakallio

Enclosure

Statements and views from Finland concerning Nunasvaara South and Niska South, Niska North and Nunasvaara North



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YM; Two notification pursuant to Article 3, Espoo convention, graphite mining at the Nunasvaara South mine and Niska So

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VN/21286/2021-YM-21

Finland's answer to Sweden's notification on Nunasvaara graphite mines

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