



Ympäristöministeriö  
Miljöministeriet  
Ministry of the Environment

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**Additional answer to the notification in accordance with Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) for the planned changes in waterway, Leirpollen municipality of Tana**

Finland answered on 28 April to the notification sent by Norway concerning the environmental impact assessment (EIA) of the planned changes in waterway Leirpollen, in the municipality of Tana and indicated its wish to participate into the EIA procedure of the project. Finland and Norway agreed in bilateral discussions that Finland can deliver its comments on the scoping document on 7 June.

Ministry of the Environment provided the public and authorities an opportunity to comment the material from 10 May to 2 June. The material was displayed in Utsjoki municipality and in the internet.

Four answers were received. Provided comments all highlight the special importance of Tana river ecosystem and Tanamunningen Nature Reserve being globally unique and North-Europe's largest, almost undisturbed estuary. This internationally significant wetland area is valuable for migratory birds and is also a Ramsar Site. As Tana is a border river, its water quality and condition, especially for salmon and sea trout is of utmost importance.

**Centre for Economic Development, Transport and the Environment in Lapland** states that the scoping document is quite complicated to follow due to partly poor translation quality. The scope and extension of planned assessments are not very clear. The ecological state of the water system within the project area must be well described in the EIA report.

Impact assessment must present clearly the likely impact of the project on fish stock, especially salmon and sea trout, and also the impact on ecological state of the Tana River. Impact on sand eel, also known as the sandlance as the ecosystem's key species must be assessed.

The document is referring to sediment samples taken on harmful substances without any evidence on findings. These must be presented in the EIA report including the dispersion and impact. EIA report or its annexes must include a detailed description of the methods used in the assessment – how and to what extent the impact assessments have been made, how the results have been processed and to what extent the impacts stretch to Finland.

**Finnish Sámi Parliament** considers the scoping document to be inadequate, because it does not include assessing impacts on Sámi culture. The impacts arise from changes in nature conditions and ecosystems

which in turn weaken the possibilities to carry on with traditional means of earning one's living. Additionally it is not stated how the Sámi can participate into the planning so that free, prior informed consent can be given by them.

Tanamunningen Nature Reserve protects the diversity in the area. Many of the species, e.g. salmon, sea trout and bean goose are also central for Sámi on Finland's side.

Sámi Parliament refers to United Nations' Convention on Biological Diversity, ratified also by Norway. Both Norway and Finland are committed to preserving and maintaining knowledge, innovations and practices of indigenous embodying traditional lifestyles relevant for the conservation and sustainable use of biological diversity (Article 8 –in situ Conservation). Additionally the Parties to the Convention have committed to protect and encourage customary use of biological resources in accordance with traditional cultural practices that are compatible with conservation or sustainable use requirements (Article 10 c). Finnish Sámi Parliament considers that the planned project endangers the biological diversity of Tana river salmon, which weakens the Sámi fishing culture.

Norway and Finland have renewed the fishing agreement of Tana river and its application starts during the fishing season of 2017. Because the impact of this new agreement on salmon cannot yet be assessed, new projects should not be implemented. Sámi Parliament opposes the planned upgrading of the waterway.

**The Finnish-Norwegian Transboundary Water Commission** points out that it is important to assess impacts of all planned measures on 1) shared salmon and sea trout stock including their whole life cycle, 2) stock of sand eel as it is the ecosystem's key species, 3) assessment principles of Water Framework Directive must be applied with. Remedy measures must be brought forward if negative impacts are shown to the above mentioned topics.

**Ministry of Transport and Communications** had no comments to present.

Based on the comments received and reflecting its own views the Ministry of the Environment wishes to stress the importance of assessing the impact of the project on the water quality of the Tana River, on salmon and sea trout and of the biodiversity of the river as a whole. Also the other comments given in the statements must be considered in the process. Especially important is to consider comments given by the Finnish Sámi Parliament, e.g. the procedure should be amended to involve the Sámi into the EIA and to include the traditional, local and indigenous knowledge into the EIA. The transboundary impact on Finland should be specified in the EIA documentation.

On behalf of Permanent Secretary,  
Director General



Helena Säteri

Ministerial Adviser



Seija Rantakallio

Annex: Comments from Centre for Economic Development, Transport and the Environment in Lapland, Finnish Sámi Parliament, Finnish-Norwegian Transboundary Water Commission and Ministry of Transport and Communications.

cc:

Norwegian Coastal Administration

Centre for Economic Development, Transport and the Environment in Lapland

Finnish Sámi Parliament

The Finnish-Norwegian Transboundary Water Commission

Utsjoki municipality

