

## **Davvi wind power plant in Finnmark county and connecting transmission lines**

### ***Summary of statements and opinions from Finland (in alphabetical order)***

*Please note that the statements have not been translated entirely, and to get a detailed view of the contents, a full translation is needed.*

#### **Fingrid Oyj**

- obligation to connect the transmission lines
  - o in the Davvi wind power project, Statnet and other network companies of the project area have the obligation to connect the transmission lines and to develop the transmission system
  - o the transmission connection between the Norwegian grid and the Finnish grid is not under the responsibility of the Fingrid
  - o if Statnet conducts the strengthening of the transmission system required for connecting the grids, Fingrid is ready to negotiate about the need of the cross-border transmission link with Statnet
- development of the power line network
  - o the transmission capacity of the grid of Lapland (220 kV) is insufficient for the Davvi project plans as it is planned for the needs of Northern Lapland and as a backup connection for Finnmark
  - o transmission of hundreds of megawatts from Northern Norway to Finland and connecting the Davvi project in the transmission system of Finland would require significant efforts for strengthening the grid as far as to Southern Finland, in practise, this would mean about 1000 kilometres of new transmission lines of 400 kV
  - o strengthening of the grid requires comprehensive system level investigations
  - o the wind power potential of Northern Norway and the transboundary transmission needs caused by the possible wind power constructions should be assessed as a part of the grid planning process of the Baltic sea area and Nordic countries
  - o in the investigations, it should be taken account that the constraints caused by the power balance of the grid determine the transmission capacity of the grid, and that is why the technical features of the power plants have a significant impact on the connecting power production amounts
- Land use
  - o Fingrid is provided for new cross-border transmission links between Finland and Norway
    - In the regional land use plan of Western Lapland, there is a power line reservation for 400 kV transmission connection from Petäjäkoski to the Norway's border via Kittilä
    - In the regional land use plan of Eastern Lapland, a need for 400 kV transmission connection from Pirttikoski to Sodankylä's border area and further to Utsjoki is addressed. Fingrid has provided an investigation about the placement of the power line to the Regional Council of Lapland in 2017.

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- Fingrid has suggested that the placement of the power line would be addressed in the regional land use plan of Northern Lapland in order to be provided for the possible development needs
- Permissions for the transmission lines
  - the permissions for cross-border transmission links are under the control of the Ministry of Economic Affairs and Employment
  - the expediency of the constructions of international transmission links must be assessed with regard to the development and reciprocity of the electricity market according to the Electricity Market Act (588/2013) 16 §, and should be taken into account by the Ministry of Economic Affairs and Employment with regard to the permission

### **The Finnish Association for Nature Conservation (FANC)**

- Finland should participate in the EIA process
- placement of wind power turbines and their power transmission lines in wilderness areas may lead to fragmentation of rare continuous wilderness areas which is why the FANC prioritizes building new wind power infrastructure near existing infrastructure and has serious reservations about the Davvi project
- suggests that environmental impacts caused by the constructions in Norway and in Finland should be included in the same impact assessment
- environmental impacts on
  - landscape
    - Tenojoki river valley is classified as a nationally valuable landscape by the Council of State
    - both power line alternatives are problematic, therefore also new alternatives for power lines and border-crossing points should be investigated
    - mitigation measures cannot be regarded to be sufficient
    - high-quality landscape planning must also be part of the project
  - biodiversity - impacts on biodiversity are assessed insufficiently, assessment is needed about:
    - impacts on golden eagle, gyrfalcon, peregrine falcon, snowy owl, lesser white-fronted goose and other geese
    - impacts on eagle territories based also on one year satellite based monitoring
    - importance of Tenojoki river valley for migratory birds
    - impacts on mammals, especially on wolverine and arctic fox
  - integrity of large continuous wilderness areas
    - the wilderness areas in the project area are transboundary
    - fragmentary impacts on these areas should be assessed by broad-based analysis of both environmental impacts and impacts on reindeer-herding and tourism
  - tourism, especially nature tourism in Utsjoki, Norway's and Finland's border areas
  - reindeer herding

## Attachment 2. Summary of statements and opinions

- land use, decrease of pasture areas, overgrazing
- traffic, noise
- Sámi culture and natural economy industries
  - the Convention on Biological Diversity Article 8(j) should be taken into account with regard to the Sámi culture and natural economy industries
  - the impact assessment programme lacks the impact assessment of cultural and ecological traditional knowledge of the Sámi and its use
  - Akwé: Kon Guidelines should be implemented in large projects that affects Sámi home regions
- impacts on wind power production investments near the transmission lines should be taken into account in the EIA process

### Finnish Sámi Parliament

- Finland should participate in the EIA process
  - arguments:
    - the wind power plant is planned to be located in essential land and resource areas of Sámi community and sacred places of the Sámi
    - Sámi community of Tenojoki river valley is traditionally acting across boundaries, and therefore social impacts on reindeer herding in the Norwegian side affect the whole Sámi community of Tenojoki river valley
    - negative impacts on nature, landscape and Sámi culture
- assessment of impacts on Sámi culture is needed
  - Sámi Parliament appeals to
    - The constitution of Finland 17 § 3
    - International Covenant on Civil and Political Rights Article 27
    - United Nations Declaration on the Rights of Indigenous Peoples 2007
    - the Outcome document of the high-level plenary meeting of the General Assembly known as the World Conference on Indigenous Peoples (UN General Assembly resolution A/RES/69/2)
  - the impacts on Sámi culture are caused by ecosystem change and environmental change which have negative impacts on traditional Sámi livelihoods
  - participation of the Sámi in the planning process is not planned
  - as the biological diversity is threatened, Sámi Parliament refers to the Convention on Biological Diversity Articles 8 and 10 that both Norway and Finland have ratified
    - Article 8 (In-situ Conservation) (j):  
Subject to its national legislation, respect, preserve and maintain knowledge, innovations and practices of indigenous and local communities embodying traditional lifestyles relevant for the conservation and sustainable use of biological diversity and promote their wider application with the approval and involvement of the holders of such knowledge, innovations and practices and encourage the equitable sharing of the benefits arising from the utilization of such knowledge, innovations and practices;
    - Article 10 (Sustainable use of Components of Biological Diversity) (c):  
Protect and encourage customary use of biological resources in accordance with traditional cultural practices that are compatible with conservation or sustainable use requirements;

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- Sámi Parliament urges the Ministry of the Environment to adopt the Akwé: Kon guidelines in the impact assessment under the article 8 (j)
- the impact assessment programme should include the transmission line construction planning in Finland related to the Davvi project in order to assess the project as a whole
- the impact assessment programme does not take the Sámi view of the cultural environment into account
  - o Understanding the landscape approach related to traditional Sámi livelihoods and culture requires knowledge of the local culture
  - o Sámi cultural environment consists of archeological heritage, cultural landscape, built environment and traditional knowledge meaning the knowledge about land use which comes up in place names, beliefs, music and stories
- Sámi Parliament is against the Davvi project

### **Kevo Subarctic Research Institute, University of Turku**

- Finland should participate in the EIA process because of the significant impacts on nature
- environmental impacts should be assessed across boundaries as a whole because the power line solutions in Norway are dependent on power transmissions in Finland
- power transmission lines should be built in connection with existing lines
  - o supports power line alternative 1
    - new transmission lines from Utsjoki to the south could be built in connection with the existing power line in Finland
  - o is against power line alternative 2 which requires new power lines to Utsjoki

### **Lapland's Centre for Economic Development, Transport and the Environment**

- Finland should participate in the EIA process
  - o possible significant environmental transboundary impacts on landscape, tourism, reindeer herding, nature, land use, Sámi rights to maintain and develop their own language and culture
- power transmission from Norway to Finland is not a pending issue of any project in Finland
- impacts on landscape affect tourism
  - o Tenojoki river valley landscape is one of the most important attractions for tourism in Utsjoki
  - o tourism is developing in Utsjoki: new hotel, important projects for enhancing tourism, and the Utsjoki city plan enables supplement constructions for tourism
- minimization of negative impacts of power plant and power line constructions on reindeer husbandry should be planned carefully
  - o disruptions shouldn't lead reindeers to the wrong side of the boundary according to the treaty on movement of reindeers (93/2016)
- both power line alternatives are problematic, therefore also new alternatives for power lines and border-crossing points should be investigated

## Metsähallitus

- Finland should participate in the EIA process
  - significant environmental impacts across boundaries
- joint-EIA process should be implemented because power transmission solutions have an important role in wind power constructions
- the responsible for the project should be aware of:
  - impacts on protected areas and wilderness areas
    - Natura 2000 network: Paistunturi Wilderness Area, SAC (Special Areas of Conservation)
    - Kevo Strict Nature Reserve (SPA, Special Protection Area + SAC)
  - Species and habitats: importance of the biodiversity in Levajoki area
    - habitats of endangered birds of prey
    - rich biodiversity of mountain species: calciphile plants (e.g. *Rhododendron lapponicum*, *Carex rupestris*), Habitat Directive Annex II species *Carex holostoma*, rare nutrient rich fell habitats (e.g. threatened *Dryas octopetala* mountain heaths) in Gistuskáidi
  - Landscape
    - nationally valuable landscapes of Utsjoki river valley
    - suggestion of a new nationally valuable landscape area Paistunturi natural industry landscape (Paistunturien luontaiselinkeinomaisemat) and extension of Utsjoki river valley landscape in 2014
  - Sámi culture and reindeer herding
    - Act on Metsähallitus (234/2016) requires that the use of nature resources managed by Metsähallitus is coordinated with Sámi culture practices and obligations regulated by the Reindeer Husbandry Act
- the impact assessment programme
  - landscape
    - landscape change study area should be extended to the Finnish side taking account the tourism and recreation areas
    - Tenojoki-Kevo area has been selected by Metsähallitus as a priority area of nature tourism and recreation in the Natural resource planning for Northern Lapland
    - decreasing of wilderness caused by the landscape change can diminish the attractiveness of the area for hikers
    - impacts of power lines to landscape should be presented by illustrations, with special attention to crossing Tenojoki
  - birds
    - special attention should be drawn to birds of prey which have large and transboundary habitats
    - with regard to the impact assessment of power lines to birds, special attention should be drawn to migratory birds resting on the fields of the river valley in the spring, e.g. *Anser erythropus* and other geese

### **Norsk-Finsk grensevassdragskommisjon**

- all impacts across boundaries should be assessed:
  - o impacts on landscape, biodiversity, pollution including noise pollution, reindeer husbandry, fisheries, tourism, hiking, land use, bodies of water
  - o social impacts on Sámi community, culture and industries, rights of the Sámi to maintain and develop their own language and culture
- possible mitigation measures have to be planned in the assessment programme
- commission requires
  - o the local knowledge should be taken account in the decision making process
  - o good coordination between Norway and Finland

### **Regional Council of Lapland**

- Finland should participate in the EIA process
  - o significant environmental transboundary impacts
- the impact assessment programme lacks the impact assessment of the power lines to the Finnish side
- significant negative impacts on landscape in Finland which affect tourism in Utsjoki
  - Tenojoki river valley landscape is one of the most important attractions for tourism in Utsjoki
- new alternative placements for power lines should be investigated, and possible connection to Pirttikoski should be taken into account
- importance of the grid development by Statnet in East-Finmark for the Davvi project should be taken into account in the planning process
- The regional land use plan of Northern Lapland includes wilderness areas, protected areas, recreational areas, areas for natural economy industries, urban areas and important areas regarding cultural environment and landscape that would be affected by the Davvi project
- Utsjoki is a part of the Sámi region and is situated in the area intended to reindeer husbandry
- Power line alternatives are discussed with regard to the formulation of the new regional land use plan of Northern Lapland 2040
  - o Finngrid has the responsibility of the grid system and grid development according to the Electricity market Act

### **Reindeer Herders' Association**

- Finland should participate in the EIA process
- Reindeer Herder's Association and reindeer-herding cooperatives Paistunturi and Kaldoaivi are strongly against the Davvi project
- impacts on reindeer herding
  - o power line alternatives 1 and 2 are located in reindeer-herding cooperatives Paistunturi and Kaldoaivi when entering to Finland, possible impacts on other reindeer-herding cooperatives as well
  - o environmental impacts affect always the reindeer herding conditions
  - o impacts on reindeers, reindeer herding, pastures and pasture use should be assessed also in Finland

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- local reindeer-herding cooperatives should be involved in the participation process
- Reindeer Herder's Association offers GIS data about reindeer herding for investigations

### SIIDA, Sámi Museum, Sámi musea

- Finland should participate in the EIA process as the Davvi project has significant adverse impacts across boundaries
- negative impacts on cultural environment, landscape, nature, land use, reindeer herding, tourism, the body of water, cultural relics, rights of the Sámi
- joint-EIA should be implemented
- more alternative lines should be investigated
- landscape
  - o impacts on landscape should be assessed across borders
  - o River valleys of Utsjoki and Tenojoki are classified as nationally valuable landscapes designated by the Council of State in 1995. Extensions of Utsjoki and Tenojoki landscapes have been suggested in 2014.
- cultural environment
  - o cultural relics in the area of Tenojoki and Utsjoki
    - e.g. Áilegas in Utsjoki, sacred place of the Sámi
    - archeological inventories in highlands are insufficient and more inventories needed
  - o impacts on the elements of cultural environment, e.g. Sámi settlements, should be assessed
- nature reserves
  - o impacts on nature reserves Paistunturi Wilderness Area FI30 2003 of the Natura 2000 network and Kevo Strict Nature Reserve should be assessed

### Tenon kiinteistönomistajat ry (Property owners of Teno)

- Finland should participate in the EIA process
- significant environmental impacts on the Finnish side
- wind power is an expensive source of energy because of its low efficiency and high costs
  - o benefits should be compared with environmental damage
  - o the wind power constructions aren't acceptable if the disadvantages exceed the benefits
- In addition to Tornionjoki, Tenojoki is the only important river for salmon in Finland and a unique landscape for fishing
- importance of the Tenojoki landscape for the tourism in Utsjoki is essential
  - o tens of thousands of travelers and fishermen visit Tenojoki annually
  - o winter tourism is developing fast
  - o large amount of leisure homes along the Tenojoki
- significant negative impacts on landscape
- environmental damage and negative impacts on properties should be minimized

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- possible negative impacts on game, e.g. willow ptarmigan, rock ptarmigan, black grouse and western capercaillie
- the priority should be the assessment of the benefits of the Davvi-project in relation to the disadvantages

### Utsjoki Municipality

- Finland should participate in the EIA process
- environmental impacts on the area of Utsjoki Municipality
  - o landscape
  - o tourism
  - o reindeer herding
  - o Sámi community, Sámi culture, Sámi industries both in Finland and in Norway
- Utsjoki Municipality suggests additions to the impact assessment programme:
  - o impact assessment in Finland, including social impact assessment and impacts on Sámi culture
  - o Akwé: Kon guidelines could be adopted
  - o more alternatives for power lines with less environmental impacts
- background for the arguments:
  - o Vision of the Utsjoki Municipality is to be famous about natural industries, cultural and nature tourism services and to respect the Sámi tradition
  - o lifestyle of the habitants is based on nature and landscape
  - o the municipal activities are based on fishery, reindeer herding, landscape, tourism
  - o settlements and tourism are located mainly in Tenojoki river valley where the landscape is threatened
  - o reindeer herding is affected by multiple land use pressures
    - land use pressure increases as the power lines diminish pasture areas
    - reindeer husbandry is threatened
- power line constructions in Finland shouldn't be assessed as a separate process
- Utsjoki Municipality is against the constructions of power lines and the wind power plant
- **reindeer-herding cooperatives Paistunturi and Kaldoaivi**
  - o are strongly against the Davvi project, because the Davvi project decreases pasture areas and complicates reindeer herding, and also in their opinion, Finland should participate in the EIA process
- **Tenonlaakson yrittäjät ry**
  - o requires conducting international EIA process because of the negative impacts on landscape, ecology and tourism in Utsjoki Municipality



### Private statements

- 14 private statements
- according to several private statements, Finland should participate in the EIA process because of significant impacts on the Finnish side
- almost all statements are strongly against the power line alternative 2 or the whole Davvi project
- according to several private persons' statements, the Davvi wind power plant and connecting power lines have negative impacts on:
  - o unique landscape of Tenojoki, fell landscape, Rastigaisa, sacred fell of the Sámi and its traditional landscape
  - o cultural heritage: registered and unknown relics related to Sámi culture in Levajoki area, relics registered by National Board of Antiquities in in the Finnish side of the Levajoki area (e.g. on either side of Tanssijoki 12 relics around Seitatörmä), historic areas of the Sámi situated in the Finnish side of the Levajoki area are protected by the National Board of Antiquities
  - o wilderness
  - o nature
    - golden eagle habitat
  - o reindeer herding
  - o Sámi culture, rights of the Sámi, Sámi livelihoods
    - power lines suggested in the impact assessment programme are situated in the area of Sámi activities
  - o tourism, nature tourism - important industry of the municipality of Utsjoki
    - power line alternative 2 would be located in the property of Tenon tunturituvat ky
  - o fishing
  - o hunting
  - o well-being
  - o health
  - o values of properties, e.g. the value of Pirunpolska Oy property
- according to some private statements, the impact assessment programme should include:
  - o comprehensive description of all alternatives for power lines and border-crossing points mentioned in the impact assessment programme
  - o the assessment of impacts to Sámi culture, the Sámi, well-being of the Sámi community, the municipality of Utsjoki and industries (several statements)
  - o social impact assessment
- suggestions of some private statements
  - o the Ministry of the Environment could counsel Norway to adopt the Akwé: Kon guidelines
  - o planners of the power lines should come to see the Tenojoki landscape
  - o The power line should be built on the uninhabited fells instead of the Tenojoki shore
- remarks from the private statements
  - o the maximum height of buildings is 4,6 meters in the area, the electric poles would be 45 meters
  - o The Davvi project and the connecting power lines undermine
    - the principles of the Constitution of Finland 17 § 3 and the International Covenant on Civil and Political Rights Article 27, as it offends the rights of the Sámi to maintain their language and culture including traditional livelihoods reindeer herding, fishing and hunting

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- the principles of the Industrial Strategy of Utsjoki are nature tourism and Sámi industries
  - the regional land use plan of Northern Lapland 2008
- According to the Electricity Market Act, authorization of the Ministry of the Environment is needed when electric cord has at least 110 kV
- the capacity of the current power lines is insufficient which means that it is necessary to build new lines
- One statement is for the Davvi project, arguing that the disadvantages of hydroelectric energy and nuclear power are bigger than the disadvantages of wind power
  - According to the statement, there are people who support the Davvi project. In the hearing in Utsjoki, 8 November, the opinions for the project didn't come out, because the opposition to the project was so strong.