

Authority Services

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Finland's response to the consultation in accordance with Articles 4 and 5 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) regarding the plans for fish farming in Gamvik Municipality in Finnmark County Norway

The Finnish Environment Institute acknowledges that Finland has received the consultation request from Norway on 2 April 2025, in accordance with Articles 4 and 5 of the Espoo Convention to submit comments on Environmental Impact Assessment in a Transboundary Context regarding the plans for fish farming in Gamvik Municipality in Finnmark County Norway.

The Finnish Environment Institute notes that Finland was not notified in accordance with Article 3 of the Espoo Convention. The consultation documents about the environmental impact assessment were received only at a later stage of the process.

Consultation in Finland

In accordance with Section 30 (911/2022), Subsection 1 of the Finnish Act on Environmental Impact Assessment (252/2017), the Finnish Environment Institute is the competent authority and responsible for tasks under the Espoo Convention when a project in a party of the treaty or a Member State of the European Union may have significant transboundary environmental impacts in Finland. The Norwegian Environmental Agency requested Finnish Environment Institute to organise the public participation procedure in Finland and to provide comments concerning the assessment of the environmental impacts of the project and submit comments from the relevant parties in Finland.

In Finland, the public and the authorities were given the opportunity to comment on the consultation documents from 8 April to 16 May 2025. The documents were available on the website of Finland's environmental administration and on a platform by Ministry of Justice in Finland for requesting and submitting statements electronically (lausuntopalvelu.fi). Statements were also asked from relevant stakeholders.

Remarks received during the consultation

The Finnish Environment Institute received 11 statements. The Finnish Environment Institute has prepared a summary of the original statements in English below. However, the original



statements in Finnish, which are enclosed to this letter, include important and detailed remarks which need to be examined and taken into consideration in their entirety.

Ministry of Agriculture and Forestry

The plan envisages a salmon farming capacity of 3 120 tonnes, which is normal for a full-scale salmon farm in northern Norway.

The planning process for the plant began already in 2017, but since the plant was not granted a permit at that time, the municipality of Gamvik has included the plant in the regional regulation. The plan has been the subject of much criticism, including an objection from the County Governor of Finnmark on the grounds that the project conflicts with the interests of endangered seabird species and their habitats, conflicts with the interests of anadromous salmon stocks and does not meet the obligation to assess new measures under the [Norwegian] Water Regulation. The County Governor's in-depth opinion has concluded that there are no conditions for the establishment of the plant, as it would, *inter alia*, pose a significant threat to biodiversity and migratory fish stocks. The studies on the facility clearly show the significant negative impacts of the proposed salmon farm on biodiversity, in particular on salmon and other migratory fish stocks.

The Ministry of Agriculture and Forestry considers that the fish farm should not be granted a permit. The Ministry shares the opinion of the County Governor of Finnmark that the adverse effects of the fish farm on biodiversity and migratory fish stocks are so significant that the establishment of the farm should not be authorised. The reasons put forward by the municipality of Gamvik for the establishment of the plant, despite the very clear proof of negative impacts, are not sufficient.

The arguments put forward by the municipality of Gamvik for the impact assessment are too narrow. The proposed project will affect a much wider range of migratory fish stocks than suggested. The proposed plant would bring salmon farming significantly closer than at present to the Tanafjord, which is protected as a national salmon fjord in Norway. The Tana River is one of the world's most important rivers for wild salmon. The main threat would be posed by increasing numbers of salmon louse (*Lepeophtheirus salmonis*) infestations and escapements of the farmed salmon. As stated in the EIA material, the currents in the project site are towards the east, which is significant for the spread of salmon lice towards the mouth of the Tana River. The Norwegian Scientific Advisory Committee for Atlantic Salmon 2024 has assessed salmon lice and escaped farmed salmon as the main threat to Norwegian salmon stocks.

It is also important to note that the state of salmon stocks in the Tana River basin has continued to deteriorate at an alarming rate since the project's impact assessments were carried out. According to a report on the state of the Tana salmon stocks in 2024, the deterioration appears to be due to changes in the marine phase of the salmon life cycle.

There is an obvious risk that the planned fish farm could further weaken the state of the salmon stocks in the Tana River, including the likely escapements of farmed salmon, salmon lice or possible new fish disease risks. In addition, there are other salmon and Sea-run brown trout (*Salmo trutta m. trutta*) rivers in the vicinity of the plant which are more affected by the risks of fish farming. As stated in the objection of the County Governor of Finnmark, the proposed farm would be located on the outer edge of the Finnmark coastline, in the vicinity of which several salmon stocks migrate. There is clear research data on the



occurrence of salmon stocks in the area, for example through the KOLARCTIC Salmon (2017) project, which has genetically analysed the occurrence of different salmon stocks along the Finnmark coast. The Ministry of Agriculture and Forestry is particularly concerned about the salmon stock in the Näätämöjoki River, whose migration route also passes through the area.

The damage to salmon and other migratory fish stocks caused by fish farming cannot be reduced by measures to control the Pink salmon (*Oncorhynchus gorbuscha*), which may also contribute to by-catch mortality of salmon, Sea brow trout (*Salmo trutta m. trutta*) and anadromous Arctic char (*Salvelinus alpinus*).

The proposed fish farm should not be authorised. The project poses significant risks to the Tana salmon stocks and other migratory fish stocks in the area. The state of salmon stocks in the Tana River has deteriorated further since the project impact assessments were carried out.

Background information:

Anon. 2025. Status of the Tana/Teno River salmon populations in 2024. Report from the Tana/Teno Monitoring and Research Group nr 1/2025.

Vitenskapelig råd for lakseforvaltning 2024. Status for norske laksebestander i 2024. Rapport fra Vitenskapelig råd for lakseforvaltning nr 19

Finnish Food Authority

The proposed fish farm is located close to the mouth of the Tana River and in its opinion, the Finnish Food Authority takes a position on the impact of the proposed fish farm on fish health in the Tana River area. The state of the salmon stocks in the Tana River, considered the most important salmon river in Europe, is very weak.

The study included in the consultation material has considered the risk of spreading salmon lice to wild fish and the risks associated with the interbreeding of escaped fish with wild fish. The Finnish Food Authority points out that, in addition to salmon lice, other fish pathogens that are susceptible to spread in fish farming pose a risk to wild fish. The risk of disease transmission is greatest for fish of the same species or related species and therefore salmon farming poses a particular risk of disease to salmonids in the region. The average annual cumulative mortality risk in Norwegian marine farms in 2024 was 15.4% for salmon (*Salmo salar*) and 15.0% for rainbow trout (*Oncorhynchus mykiss*), with infectious diseases (Norwegian Veterinary Institute, Fiskehelserapporten, 2024) being the main causes of salmon mortality. There is considerable regional variation in disease prevalence and fish mortality. In any case, the risk of spreading diseases to wild fish migrating past the fish farm cannot be ignored.

According to SNA Statement 22/2023, which accompanies the request for an opinion, "Tagging studies have shown that recently escaped farmed salmon spread in 'all directions' (Chittenden et al. 2011) and can disperse over large distances, and recaptures 250-400 km or more from the point of escape are not uncommon (Hansen 2006; Jensen et al. 2013; Solberg et al. 2023)." The distance from the proposed fish farm to the mouth of the Tana River is estimated to be less than 100 km. Thus, the risk of spreading fish diseases is related to fish escaping from the cages, in addition to wild fish migrations.



The Finnish Food Authority considers that it is important to protect the salmon stocks in the Tana River from the risk of disease from fish farming.

Centre for Economic Development, Transport and Environment of Lapland – Fisheries Authority

The Fisheries Authority of the Lapland ELY Centre takes a negative view of the establishment of an aquaculture facility based on salmon farming at Lille Kamøya.

The fisheries authority of the Centre for Economic Development, Transport and Environment of Lapland states that the Tana River is located quite close to the planned fish farm at Lille Kamøya. The salmon stocks in the Tana River are currently in a very weak state. The downward trend in salmon stocks in the Tana River has continued despite a four-year fishing ban in the river basin. At the same time, the marine survival of Tana River salmon is estimated to have declined sharply. In addition to the river basin, the decline in the marine survival of the salmon is thought to be caused by several factors (e.g. climate change, overfishing). The collapse of the Tana River salmon stock deepened further in 2024, when the number of smolts entering the river was the lowest in the monitoring history, at just under 8 500 salmon. The forecast for the Tana salmon spawning migration in 2025 is poor and there are currently no indications of an improvement in the status of the salmon stock in the foreseeable future. The state of salmon stocks has also deteriorated in recent years in several other salmon rivers in northern Norway.

The Norwegian Scientific Advisory Committee for Atlantic Salmon 2024 (Vitenskapelig råd for lakseforvaltning 2024. Status for norske laksebestander i 2024) has concluded that salmon fishing has contributed significantly to the decline of salmon stocks in Norway. Negative effects on wild salmon populations caused by salmon lice have been observed in the most intensive fish farming areas in Norway. In 2024, the number of salmon stocks lost or critically endangered due to salmon lice was estimated to be between 6 and 20 in Norway. The Committee estimates that there is a high risk that more salmon stocks will become critically endangered or disappear due to salmon lice. The Council estimates that salmon lice and the admixture of genetic material from escaped salmon are the two main risks to wild salmon stocks. Escaped farmed salmon have a negative impact on the genetic diversity and viability of wild salmon stocks. Escaped farmed salmon can have a greater negative impact on the genetic make-up of wild salmon stocks when stocks are already in a weakened state. In addition to the risks mentioned above, the establishment of a fish farm in Lille Kamøya increases the risk of fish disease to salmon stocks in the Tana River. In addition to the threats posed by fish farming, climate change and invasive species (e.g. Pink salmon (*Oncorhynchus gorbuscha*)) could have a negative impact on the future survival of the Tana River and other wild salmon stocks.

The Fisheries Authority of the Lapland ELY Centre states that the salmon stocks in the Tana River are currently in such a weak state that any measures that negatively affect the salmon in the Tana River should be avoided. The Fisheries Authority of the Lapland ELY Centre considers that the risks of adverse effects on the Tana River salmon are so significant that the establishment of a new fish farm at Lille Kamøya should not be allowed.

Regional Council of Lapland

The Tana River and the Näätämöjoki River are important Atlantic salmon (*Salmo salar*) spawning rivers. North Atlantic salmon stocks have long been in decline in both Europe



and North America. Many stocks have been lost and some are on the verge of extinction. The Tana salmon is the most diverse salmon stock in the world, but even there several sub-stocks have declined dramatically. The Tana salmon is of very high international conservation value. The salmon in the Näätämöjoki River also has international conservation value. The Tana salmon also has cultural, social and economic importance. For four summers in a row, salmon fishing has been restricted due to the weak state of the salmon stocks in the Tana. The total ban on salmon fishing has had a negative impact on the local community and on the preservation of salmon-related traditions. Salmon fishing is also linked to important economic activities for municipalities, such as tourism. Invasive species, the Pink salmon (*Oncorhynchus gorbuscha*), which has become a major problem in the Tana River, and its control could further reduce the living conditions of Atlantic salmon in the Tana River.

The Regional Council of Lapland does not support the establishment of a marine fish farm in Gamvik, Norway. In our view, the farm would pose too remarkable risk to the Atlantic salmon that rise in the Tana and Näätämöjoki rivers. The escape of farmed fish from the farms poses a serious threat to the genetic heritage of Atlantic salmon. There is also the risk of parasites on salmon reared in fish farms. For example, the skin parasite salmon fluke (*Gyrodactylus salaris*) is a major threat to Atlantic and Arctic salmon migratory stocks and if introduced into the Tana or the Arctic Ocean, it would probably destroy their valuable Atlantic salmon stocks within a few years.

Natural Resources Institute Finland (Luke)

The Natural Resources Institute considers the establishment of a new salmon aquaculture facility near the Tanafjord and Tana River area to be negative in principle, especially in the current situation where salmon stocks in the Tana River basin are in a historically weak state. Salmon stocks in the basin have declined to a fraction of their long-term level over the last six years, despite a total ban on salmon fishing from 2021 onwards in the Tana River, the Tanafjord and the coastal areas near the Tanafjord. Based on the monitoring results, the decline in salmon stocks appears to be due to an increase in mortality during the marine phase of the salmon migration. At the same time, the numbers of the invasive alien species, the Pink salmon (*Oncorhynchus gorbuscha*), have increased exponentially, reaching in 2023 a level in the Tana River that was already about ten times higher than that of Atlantic salmon. Pink salmon and its control measures could further reduce the status of salmon stocks in the Tana River.

In this situation, any new pressure on the Tana River salmon stocks should be minimised. The proposed salmon farm in the Mehamn area poses new potential risks to Tana River salmon stocks. One remarkable risk is the increase in Salmon louse (*Lepeoptheirus salmonis*) infestations of migratory juvenile salmonids migrating to the sea via the Tanafjord, which already appear to be suffering from reduced marine tolerance. Although the risk of Salmon louse infestation is at its highest relatively close to the salmon farm, the Tanafjord is in an area where the risk still exists. The risk is likely to be increased by the direction of the main sea currents in the area towards the east and the Tanafjord.

Another important risk factor for wild salmon stocks in the Tana is farmed salmon escaping from farms. They may contribute to spawning in the Tana River and, when reproducing, may cause genetic changes in the wild salmon stocks, which may lead, among other things, to the loss of long-established and beneficial local adaptations and thus to a deterioration in the status of the salmon stocks.



The risk for the Tana is increased by the large size of the water body and strong currents, which may attract escaped salmon to the Tana River. The recent collapse of the Tana salmon stocks has reduced the buffering capacity of the salmon stocks in the river against the escapement problem. In terms of escapee numbers and genetic purity, the situation in the Tana River is moderately good (= relatively few escapees).

The Natural Resources Institute takes a negative view of the establishment of a new salmon farm in the Mehamn area of Gamvik municipality because of the potential risks to salmon stocks in the Tana River.

Sámi Parliament

The escape of farmed fish poses a serious threat to Atlantic salmon and its genetic heritage. Salmon escapes occur regularly, for example in 2025, 27 000 farmed salmon escaped from Mowi at another fish farm. Currently, 2/3 of the Norwegian wild salmon genome is contaminated by escaped farmed salmon. The fish farm is located 30 km from the mouth of the Tanafjord, which significantly increases the risk of contamination of the salmon rivers the Tana River and the Näättäjäjoki River. This poses a significant threat, especially in the current situation where the traditional Atlantic salmon stock is giving way to pink salmon (*Oncorhynchus gorbuscha*). Atlantic salmon is also threatened by parasitic organisms such as salmon lice (*Lepeophtheirus salmonis*) which originate from fish farms. Salmon lice and other parasites can transmit diseases to Atlantic salmon and other marine animals that migrate to the Tanafjord.

The establishment of a fish farm on the coast of the municipality of Gamvik would further increase the risk of a decline in Atlantic salmon stocks, which would jeopardise the already weakened conditions of the River Sami culture for the practice of traditional fishing and its recovery and continuity.

Salmon stocks in the Tana River are currently in a critical state, and salmon fishing has also been severely restricted in several side rivers on the Finnish side. A further weakening of the conditions for fishing culture in an already critical situation would conflict with the rights of the Sami people as the indigenous people, which are protected, inter alia, by the Finnish Constitution Article 17(3), the UN Declaration on the Rights of Indigenous Peoples and Indigenous and Tribal Peoples Convention (No. 169) of International Labour Organization (ILO). Indigenous peoples have the right to maintain and develop their own cultural and traditional livelihoods. The Sámi Parliament does not support the establishment of fish farms in the mouth of the Tanafjord because of the significant threat they pose to Atlantic salmon in the Tana River and the Näättäjäjoki River.

Finnish Association for Nature Conservation

The state of salmon stocks in the Tana River is critically weak. They need protection measures both in the river and in the sea area.

A new fish farm would increase the risks to salmon through disease risks and escapees, among other things.

The Finnish Association for Nature Conservation believes that the EIA shows that the project should no longer be promoted.



Sámi Museum Siida

The Sámi Museum Siida gives its opinion on the matter as a regional responsible museum in accordance with Section 7 of the Museums Act (314/2019) for its field of activity (built and archaeological cultural heritage and landscape) and as a national responsible museum in accordance with Section 9 of the Museums Act (314/2019) for its special field (Sámi culture).

The proposed fish farm is located about 30 km from the mouth of the Tanafjord in an area where there have been no fish farms in the past. The Tana River has historically linked the Sámi people living along its banks, and the transnational character of the river has been emphasised, particularly in the fishing industry, which is based on the Sámi people's ancient usufruct rights. Salmon fishing and the fishing culture, with its structures and traditions, have also contributed to the formation of the region's cultural environments, such as the characteristics of the nationally valuable landscape areas (VAMA) along the Tana River and its tributaries. Traditional knowledge about places and their use is part of the Sámi cultural environment.

In recent years, salmon fishing has been strongly restricted on the Tana River and its tributaries due to the weak state of salmon stocks, which has also made it difficult to pass on traditional fishing and related information. According to the documentation accompanying the request for an opinion (including SNA opinion 22/2023), the planned aquaculture facility could have adverse effects on the salmon stocks in the Tana River through the salmon louse and the genetic impact of escaped farmed salmon. This may further reduce the possibilities for traditional Sámi fishing activities in the Tana River and thus negatively affect both Sámi culture and cultural environments. This makes it more difficult to pursue traditional livelihoods and undermines the rights of the Sámi as an indigenous people, which are protected in the Finnish Constitution, the UN Declaration on the Rights of Indigenous Peoples and the International Labour Organisation (ILO) Convention 169.

The Sámi Museum Siida does not support the establishment of the proposed fish farm in the mouth of the Tanafjord.

The Finnish Transport and Communications Agency Traficom, Reindeer Herders' Association and Centre for Economic Development, Transport and the Environment of Lapland (Environment and natural resources) did not have any comments on the matter.

Conclusions

The statements received during the consultation made it clear that the short distance to the important salmon fjord Tanafjord, the weak current state of salmon stocks in the Tana River, the possibility of escapements of farmed fish and the salmon lice and possible new fish diseases that escaped fish may spread are of great concern. The weakening of the state of the salmon stocks in the Tana River conflicts also Sámi people's rights to maintain and develop their cultural and traditional livelihoods. The fact that the fishing is already restricted due to the salmon protection measures does not negate this. All received statements are unequivocally negative towards the plans for establishing a fish farm in the relatively close proximity of the Tanafjord.



Based on the given statements and its own evaluation, the Finnish Environment Institute is confident that the plans for fish farming in Gamvik Municipality will have significant adverse effects on the salmon stocks in Tanafjord and thus also the Tana and Näätämöjoki rivers in northern Finland. The proposed fish farm should not be authorised. If the authorisation is still under consideration after the consultation, Finland requests negotiations with Norway under article 5 of the Espoo Convention.

Head of Services

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 Point of Contact to the Espoo Convention

Hanne Rajanen

This document has been electronically signed. The electronic signatures can be verified from the register office of the Finnish Environment Institute.

Appendices

For information

Received statements in Finland (in Finnish)

Ministry for Foreign Affairs of Finland
 Ministry of the Environment
 Ministry of Agriculture and Forestry of Finland
 Finnish Food Authority
 Centre for Economic Development, Transport and the Environment of Lapland
 Centre for Economic Development, Transport and the Environment of Lapland – Fisheries Authority
 Regional Council of Lapland
 Natural Resources Institute Finland (Luke)
 Finnish Association for Nature Conservation
 Sámi Parliament
 Sámi Museum Siida
 Finnish Transport and Communications Agency Traficom
 Reindeer Herders' Association

