

Authority Services

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Finland's response to the notification in accordance with Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) of the plans for the establishment of a nuclear power plant in Heim and Aure municipalities in western Norway

The Finnish Environment Institute acknowledges that Finland has received the notification from Norway, dated on 25 November 2025 in accordance with Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) regarding the environmental impact assessment (EIA) of the plans for the establishment of a nuclear power plant in Heim and Aure municipalities in western Norway.

The responsible project developer, Trondheimsleia Kjernekraft AS, is planning the development and operation of a new nuclear power plant based on small modular reactors (SMRs) of up to 300 MW, each placed in separate buildings. Several alternatives are being considered, including reactor technologies and plant sizes. The notification outlines a maximum installed capacity up to 1500 MW. According to Norsk Kjernekraft AS, this could generate an annual power production of 12.5 TWh, equivalent to about 8% of Norway's total annual electricity production today.

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 impacts in Finland. The Norwegian Environmental Protection Agency requested to indicate, whether Finland intends to participate in the EIA procedure, and to submit any comments to the proposed project and planning programme from the relevant parties in Finland.

The public and the authorities were given the opportunity to comment on the consultation documents from 28 November 2025 to 2 January 2026, which were available on the website of Finland's environmental administration and 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 has prepared an English summary of the 15 statements received in Finland. However, the full original statements in Finnish or Swedish, which are enclosed to this letter, need to be considered in the environmental impact assessment.

Ministry of Defence

The Ministry of Defence considers that there are no national defence reasons for Finland to participate in the EIA procedure for the project.

Ministry of Social Affairs and Health

The Ministry of Social Affairs and Health refers to two statements it issued in 2025 on the possible health effects in Finland of a serious design-basis accident involving 100 terabecquerels at the nuclear power plant to be built in the municipality of Varberg in southern Sweden. A document prepared by a Swedish consultant shows that such an accident is not expected to have any public health impacts in Finland.

With reference to the above statements, the Ministry of Social Affairs and Health also sees no need to participate in the transboundary environmental impact assessment of a design-basis nuclear accident at a nuclear power plant that may be built in Central Norway in the future, in accordance with the Espoo Convention.

The Ministry of Agriculture and Forestry

Based on the information available on the project, it is not considered to have any significant transboundary environmental impacts within the administrative sector of the Ministry of Agriculture and Forestry. The Ministry of Agriculture and Forestry considers that Finland does not need to participate in the EIA procedure for the project.

Radiation and Nuclear Safety Authority of Finland (STUK)

The Taftøy industrial area is located more than 600 kilometres from Finland. The environmental impact of the project has not been assessed in the documents attached to the request for a statement.

STUK notes that, due to the distance and the size of the nuclear reactors, it is highly unlikely that any radioactivity released in the event of an accident at the nuclear power plant would have a significant environmental impact in Finland.

For the reasons mentioned above, STUK does not consider it necessary for Finland to participate in the environmental impact assessment procedure for the nuclear power plants in the municipalities of Heim and Auren in Norway.

The Finnish Institute for Health and Welfare

The Finnish Institute for Health and Welfare would like to thank you for the opportunity to comment on Finland's need to participate in the environmental impact assessment procedure



for nuclear power plants in the municipalities of Heim and Aure in Norway. We have no comments on the matter.

VTT Technical Research Centre of Finland Ltd

VTT Technical Research Centre of Finland Ltd (VTT) appreciates the opportunity to comment on this matter.

According to the assessment of VTT's experts in severe reactor accidents and the dispersion of radioactive substances, due to the remote location of the plant area in relation to Finland, the project will not have any environmental impacts that could affect Finland.

In VTT's view, the project will therefore have no transboundary environmental impact on Finland, and VTT does not consider it necessary for Finland to participate in the environmental impact assessment procedure for the small modular reactors with a maximum capacity of 300 MW that may be built in the Taftøy industrial area in Norway, Heim and Auren municipalities in Norway, where small modular reactors with a maximum capacity of 300 MW may be built. VTT has no comments on the consultation documents.

Geological Survey of Finland

GTK is thanking for the opportunity to comment and states that GTK has no comments to make.

The North Savo Regional Council

The North Savo Regional Council appreciates the opportunity to submit a statement and notes that they have no role in the environmental impact assessment procedure for small modular reactors with a maximum capacity of 300 MW that may be built in the Taftøy industrial area in the municipalities of Heim and Aure in Norway.

The Finnish Safety and Chemicals Agency

The Finnish Safety and Chemicals Agency (Tukes) does not need to participate in the EIA.

The Helsinki-Uusimaa Regional Council

The Helsinki-Uusimaa Regional Council is thanking for the request for a statement and informs you that they will not be issuing a statement on Finland's need to participate in the environmental impact assessment procedure for the nuclear power plants in the municipalities of Heim and Aure in Norway.

The Centre for Economic Development, Transport and the Environment for Southwest Finland

The Centre for Economic Development, Transport and the Environment for Southwest Finland is thanking for the request for a statement. The Centre for Economic Development, Transport and the Environment for Southwest Finland has not identified any impact of the project on its area of operation and therefore has no comments on the consultation documents.

The Regional Council of Southwest Finland

The Regional Council of Southwest Finland will not issue a statement, as the plans do not conflict with the regional planning or other planning in Southwest Finland.



The Government of Åland

The Government of Åland decided to issue the following statement: As far as Åland is concerned, Finland does not need to participate in the EIA procedure.

Women Against Nuclear Power

The Women Against Nuclear Power issued a long statement which is attached to this letter in Swedish. The conclusion of the statement is translated in English below.

In conclusion

Large-scale expansion of nuclear power in Norway to sell electricity to Europe is a dangerous development. Several European countries have already rejected nuclear power due to the risks involved and are instead investing heavily in efficiency and renewable energy.

Before an application for a licence for a possible nuclear power plant in Aure and Heim is submitted, a thorough opinion poll must be conducted and published among the population groups closest to the power plant site, documenting all the facts about the risks of nuclear power and good alternatives to nuclear power.

Women Against Nuclear Power's views based on the Espoo Convention:

- No political decision has been made on the introduction of nuclear power in Norway. In order to meet the requirements for open, democratic decision-making, a decision must be preceded by a comprehensive public debate on the matter.
The local population should be consulted.
- A government public inquiry, Kjernekraftutvalget (KKU), into the possible role of nuclear power in Norway is currently underway. The process of the inquiry programme and the Espoo Convention may thus influence the KKU in favour of nuclear power in Norway. The process of an investigation programme on nuclear power in the municipalities of Aure and Heim should be halted pending a possible positive outcome in the KKU for nuclear power.
- An unbiased analysis of future electricity needs and the advantages and disadvantages of different energy systems should be presented.
- A detailed plan for the disposal of radioactive waste – low- and intermediate-level waste and spent nuclear fuel – must be presented. The construction of nuclear power plants in Europe and other countries without a solution for final storage is extremely irresponsible and transfers both the technical and financial responsibility to future generations.
- The proposed investigation programme only mentions civil nuclear power. It does not meet the requirements of the Espoo Convention for a broad and comprehensive analysis that should include the military and strategic industries, the nuclear fuel cycle, the proliferation of materials that can be used in nuclear weapons, increased security threats due to sabotage and conflicts, and long-term effects related to waste, transport and preparedness.

The transboundary safety risks associated with the entire life cycle of nuclear power are not adequately addressed.



Women for Peace

Women for Peace issued a long statement which is attached to this letter in Swedish. The conclusion of the statement is translated in English below.

Conclusion

- Nuclear power is not CO2 emission-free – not even close to zero.
 The production of nuclear power does not produce greenhouse gases, but the entire nuclear power life cycle causes greenhouse gases throughout the long construction phase, when uranium ore is mined and processed, when waste management facilities are built, and when waste is treated and stored. At the end of its life, the reactor must be dismantled and the uranium mines rehabilitated.

All these activities lead to greenhouse gas emissions and contribute to transboundary global warming.

- Climate change can cause transboundary damage to nuclear power plants.
 As knowledge about climate sensitivity and the rate of polar ice melt increases, it has become clear that sea level rise is occurring much faster than previously thought – meaning more frequent and more destructive storms, storm surges, heavy rains and floods. At least 100 nuclear power plants have been built just a few metres above sea level, which means that nuclear power plants are literally on the front line of climate change risk.

Nuclear power plants are vulnerable to heat waves and droughts because they depend on water sources that, due to climate change, do not produce enough water for the cooling process or produce water that is too warm. For these reasons, nuclear power plants are forced to either reduce their electricity production or even shut down the plant. This raises energy prices for consumers and means that the plants are less efficient overall. It also affects transboundary electricity prices in the common electricity markets.

- The many links between nuclear weapons and nuclear power are clear. Nuclear power has obvious dangers, and its production must be stopped. We need a safe, genuinely sustainable, global and rapid green solution to our energy needs – not a problematic form of energy such as nuclear power, which leaves a deadly legacy for future generations. In recent years, Norway has gained respect and trust for its efforts in the field of renewable electricity consumption.
- Norway has remarkable opportunities to utilise wind and waves for sustainable electricity production and thus set a long-awaited and image-enhancing example for other countries that do not invest, or do not wish to invest in the future, in nuclear power and support the nuclear weapons industry.

Participation in the transboundary EIA procedure

The Finnish Environment Agency received 15 responses. Having considered the responses, the Finnish Environment Agency has decided that Finland will not participate in the environmental impact assessment of the nuclear power plants planned in the Norwegian municipalities of Heim and Aure. However, the Finnish Environment Agency requests that the feedback collected in Finland be taken into account in its entirety in the environmental impact assessment and the environmental impact assessment report be sent for information once the assessment has been completed.



Head of Services

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 Point of Contact to the Espoo Convention

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

Appendices

Statements received in Finland (15)

For information

Ministry for the Foreign Affairs
 Ministry of the Environment
 Ministry of Defence
 Ministry of Social Affairs and Health
 Ministry of Agriculture and Forestry
 Radiation and Nuclear Safety Authority
 Finnish Institute for Health and Welfare
 VTT Technical Research Centre of Finland
 Geological Survey of Finland
 The North Savo Regional Council
 Finnish Safety and Chemicals Agency
 The Helsinki-Uusimaa Regional Council
 Centre for Economic Development, Transport and the Environment of Southwest Finland
 The Regional Council of Southwest Finland
 Government of Åland
 Women Against Nuclear Power
 Women for Peace

