

Authority services

12 May 2025

SYKE/2025/957

Norwegian Environment Agency
Guro Sylling guro.sylling@miljodir.no
post@miljodir.no
espoo@miljodir.no

Reference: 2025/10687

Finland's response to the notification under Article 3 of the Espoo Convention regarding commencement of work on the detailed zoning plan for the road FV890 in Tana municipality and its Environmental Impact Assessment

The Finnish Environment Institute hereby acknowledges that Finland has received the notification, dated 23 April 2025, and the consultation documents from Norway in accordance with Article 3 of the Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention) regarding commencement of work on the detailed zoning plan for the road FV890 in Tana municipality, Norway.

According to the notification the purpose of the detailed zoning plan is to improve 12,4 km of the existing road FV890 between Riitakuru and Rødbergnes, including replacing the bridge crossing Hårrejohka. Furthermore, the current phase of the planning consists only of a notice of commencement of the planning process, the next phases will include preparing an EIA as well as a planning description and planning map. The Norwegian regulations stipulates that this project does not need a planning programme.

Consultation in Finland

According to the Act on Environmental Impact Assessment Procedure (252/2017), the Finnish Environment Institute is the competent authority and responsible for consultation tasks related to the Espoo Convention. The Norwegian Environmental Institute asked Finland to confirm the receipt of the notification and an indication if Finland wishes to participate in the hearing of the EIA at a later stage.

Selected competent authorities were given the opportunity to comment on the consultation documents from 25 April to 9 May 2025. The Finnish Environment Institute received three statements.



Participation in the EIA procedure and statements received during the consultation

Based on the received statements and deliberating its own views, the Finnish Environment Institute states in accordance with Article 3(3) of the Espoo Convention that Finland intends to participate in the EIA procedure.

Finnish Environment Institute would like to note that the need to replace the Hárrejohka bridge is recognised, as the section is very important - and the only communication route for the inhabitants of the eastern part of Tana municipality and the coastal municipalities of Berlevåg and Båtsfjord. With the increasing challenges of climate change, it is also important that the new bridge is designed to withstand larger and more frequent flood events in the future.

Furthermore, the Finnish Environment Institute notes that due to the serious situation of low salmon and sea trout stocks in the River Tana, it is very important that all impacts of the planned project, including cumulative impacts, are examined and assessed as fully as possible. In addition, the EIA documentation should clearly address transboundary impacts, including Finland's perspective and the comments received during the consultation should be considered in further planning.

The Finnish Environmental Institute has prepared an English translation of the statements received below. The original statements attached to this letter contain important and detailed information that must be considered in the EIA.

Statements received

Norwegian Finnish Transboundary Water Commission

Background

The purpose of the detailed zoning plan is to improve 12,4 km of the existing road FV890 between Riitakuru and Rødbergnes, including replacing the bridge crossing Hárrejohka. Finnmark County Council (Finnmark fylkeskommune) and Tana municipality are responsible for the planning.

The Norwegian Finnish transboundary water commission hereby confirms to have received the notification. The Transboundary Water Commission wants to be included and heard further in the process.

In addition, the Commission has the following input to the further EIA planning process:

- The measures may have significant environmental impacts, including for water quality and anadromous fish in the affected watercourse. Hárrejohka is a tributary to the Tana River with an anadromous stretch upstream past the planned construction area. In addition, Tana watercourse is in Norway a permanently protected watercourse and a national salmon river. These values are needed to be considered.
- Water quality and aquatic environment. Hárrejohka has a «very good» ecological condition today. With reference to EUs Water Framework Directive, the aquatic environment shall be protected from deterioration, improved and restored with the aim of ensuring that water bodies have at least «good» ecological and «good» chemical status.



- The Tana River has been closed for salmon and sea trout fishing since 2021 due to low stock levels. It is therefore very important that the stocks are not exposed to further negative impacts.
- The edge vegetation along lakes and waterways. The edge vegetation zones function as a habitat for plants and animals, a landscape element, protection against erosion and for the absorption of nutrients from surface runoff, i.e. agriculture. The edge zone with scrub and vegetation is therefore important to preserve when measures are carried out in and around the watercourse.
- It is important that the environmental impacts are minimized during both the construction phase and during the rehabilitation of the existing bridge. There is registered quick clay (marine clay) at the site of the existing bridge and the danger for siltation, needs to be considered in both the construction phase and after.

The Transboundary Water Commission recognizes the need to replace the bridge over Hárrejohka as the section is very important-and the only communication route for inhabitants in eastern part of Tana municipality, and the coastal municipalities of Berlevåg and Båtsfjord. With increased challenges related to climate change it is also important that the new bridge is dimensioned to withstand larger and more frequent flood events in the future.

Norwegian Finnish Transboundary Water Commission

Finland and Norway have, on the basis of the "Agreement between Norway and Finland on a Norwegian-Finnish Transboundary Water Commission", appointed a joint Commission whose task is to act as a cooperation and contact body between the governments of Finland and Norway on issues relating to transboundary rivers, including the condition, water quality and water monitoring, fishing conditions, land use and other matters that have an impact on the cross border watercourses. The Commission is an advisory body that makes recommendations on matters relating to the border rivers. The Commission shall contribute preserving the unique natural conditions of the joint border rivers. The Commission also intends to safeguard the interests of both parties, and particularly the border population, in matters relating to the use of the border rivers.

According to the cooperation agreement on a Norwegian Finnish water region, the water region authority shall inform and consult the Norwegian Finnish Transboundary Water Commission.

Lapland Centre for Economic Development, Transport and the Environment

The Finnish Environment Institute (Syke) has received notification from the Norwegian Environment Agency of Finland's need to participate in the Espoo a transboundary EIA consultation under the agreement on the environmental assessment of the upgrade of the Norwegian road FV890 and the replacement of the Hárrejohka bridge.

Finnmark County Council and the municipality of Tana have started a detailed planning process for a 12.4 km stretch of road on the national road 890 between Riitakuru and Rødbergnes. The planning will secure land and a formal basis for upgrading the 890 road and replacing the existing bridge over the Harri River. The new road alignment will follow along the current route but shifted slightly to the west.



Significant transboundary environmental impacts and participation in the assessment procedure

Fisheries

The ELY Centre notes that the planning initiative for the impact assessment was not available as an annex to the consultation file. The ELY Centre of Lapland does not consider it necessary for Finland to participate in the EIA procedure for the project but points out the following:

In the design of the project and in the assessment of implementation options, special attention should be paid to the potential impacts of the project on migratory fish in the Tana River and to minimising potential harm to them. If the project includes work phases that cause a significant amount of direct impact on the Tana River sediment load and turbidity, such works should be timed outside the main salmon run-up period in the Tana River.

The Natural Resources Institute Finland

The Natural Resource has no comments to make.

Head of Services

Jenni Juslén

Senior Officer,
Point of Contact to the Espoo Convention

Ulla Helminen

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

For information Ministry for the Foreign Affairs of Finland
Ministry of the Environment
Norwegian – Finnish Transboundary River Commission
The ELY Centre of Lapland
The Natural Resources Institute Finland



Asiakirja: SYKE/2025/957-7 Finland's response - Road FV890 Tana Municipality Norway 12.5.2025.pdf

Seuraavat henkilöt (organisaationimen mukaisessa aakkosjärjestyksessä) ovat allekirjoittaneet tämän asiakirjan sähköisesti. / Följande personer (i bokstavsordning efter organisationens namn) har undertecknat detta dokument elektroniskt. / This document has been electronically signed by the following persons (in alphabetical order according to their organization's name):

Ulla Helminen, Suomen ympäristökeskus, viranomaispalvelut
Jenni Juslen, Suomen ympäristökeskus, viranomaispalvelut

