

Authority services

11.3.2024

SYKE/2024/194

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

Reference: 2024/182

Response to the notification under Article 10 of the SEA protocol regarding the planning programme for the intermunicipal coastal zoning plan for the municipalities Gamvik, Tana, Berlevåg and Båtsfjord in Norway.

The Finnish Environment Institute hereby acknowledges that it has received the notification dated on 29 January 2024, and the draft planning programme, regarding the planning programme for the intermunicipal coastal zoning plan for the municipalities Gamvik, Tana, Berlevåg and Båtsfjord in Norway. Finland has the possibility to participate in the assessment procedures in accordance with article 10 of the Protocol on Strategic Environmental Assessment to the UN/ECE Convention on Environmental Impact Assessment in a Transboundary Context.

According to the amended Finnish Act on the Assessment of the Environmental Impact of Plans and Programmes of Authorities (200/2005, amendments 912/2022), the Finnish Environment Institute is the competent authority for consultation tasks related to the Protocol on SEA from 1 January 2023 in Finland.

In its notification, the Norwegian Environment Agency requested Finnish Environment Institute to distribute the draft planning programme to relevant parties and to submit any comments from the relevant parties in Finland. The relevant authorities were consulted, and Finnish institute received three statements. The Finnish Environment Institute has made a summary of the statements received in Finland. However, the original statements enclosed to this letter need to be considered in full.

Response to the notification for the intermunicipal coastal zoning plan and the related Strategic Environmental Assessment

The Finnish Environment Institute would like to inform Norway that all the consulted parties that answered find it important that Finland is participating in the planning procedure for the intermunicipal coastal zoning plan and the related Strategic Environmental Assessment. Therefore, Finnish Environment Institute would like to state that Finland does want to participate in the transboundary consultations as provided for by article 10 of the Protocol on Strategic Environmental Assessment for the intermunicipal coastal zoning plan for the municipalities Gamvik, Tana, Berlevåg and Båtsfjord.



In order to ensure that in accordance with Article 10 (4) of the SEA Protocol the public and the authorities in Finland are informed and given an opportunity to forward their opinion on the draft plan and the environmental report within a reasonable time frame, Finland requests that the relevant materials will be provided in Finnish. In case Norway plans to translate the consultation documents in Swedish and/or Sámi, Finland would be interested in receiving those as well. If Norway does not translate its document to Swedish or Sami, Finland kindly asks time needed to translate the consultation documents added to the Finnish consultation time.

Statements received regarding the draft planning programme

The Finnish Environment Institute wishes to note that the consulted draft planning programme does not mention cross-border impacts at all. The transboundary impacts need to be considered and assessed. Finnish Environment Institute would like to stress the importance of protecting and conserving common wild salmon and sea trout populations in all parts of their life cycle and making sure that the plan meets the assessment requirements of the EU Water Framework Directive and carry out consultation in accordance with the Espoo Convention, taking into account transboundary environmental impacts.

The Finnish Environment Institute received three statements during the consultation. The statements received are enclosed in their entirety and the summary of the statements is presented below in English.

The Regional Council of Lapland (Lapin Liitto)

According to the consultation material, the coastal sub-plan is the municipality's most important master plan document. The purpose of the coastal zone plan is stated to be to create a uniform development direction that provides a long-term perspective and predictability in maritime policy and land use. The consultation material design programme is intended to provide a framework for the planning process and to serve as a tool for creating predictability of design work by explaining the background, organisation, planning area and purpose. Regarding national expectations, the planning programme mentions the following from the starting point of the planning work:

The counties and municipalities must reserve sufficient land area for the desired growth of the farming and aquaculture sector with updated plans that also take into account environmental aspects and other social benefits. The plans include strategies for the development of offshore aquaculture.

Counties and municipalities must identify and consider the important biodiversity of nature, outdoor recreation areas, the overall green structure, cultural-historical values, the cultural environment, and the landscape in their planning. The overall impact needs to be taken into account.



In their planning, counties and municipalities must emphasise climate adaptation and social security, and present alternatives to national climate projections in their work. Risk and vulnerability analyses are used as a basis for design and construction.

Regarding the use and protection of the sea and waterways, it is stated that the use of the area can be divided into traffic, anchor, storage and rigging areas, waterways, port area and marina, fishing, aquaculture, nature area and outdoor areas individually or jointly (combined use) by separate regulations and/or instructions. Land use may, if so regulated, be determined separately for the water level, water column and bottom.

The planning programme does not indicate in detail what kind of functions and to what extent they are being developed for the planning area. However, it can be interpreted from the data that it could be a question of, for example, the development of fish farming and processing activities. There are no direct references in the material of the production or energy transmission of marine energy in the planning area or other means of mitigating climate change.

The planning programme has identified assessment needs for impacts on biodiversity, fisheries, aquaculture, cultural monuments and the environment, pollution, transport, and infrastructure, as well as outdoor activities and travel. In the case of biodiversity, reference is made to national salmon fjords, which are important migration routes for anadromous fish species, and which must be taken into account. Possible evaluation needs are mentioned. For example, the overall impacts of the concrete area proposals in the zoning plan and the impact of the spread of the disease on wild salmon and trout populations as a result of farming activities. The planning programme does not mention cross-border impacts.

Lapland Agreement and regional plan

With the Lapland Agreement 2022–2025, the Regional Council of Lapland is committed to working to secure the breeding conditions of salmon and other migratory fish populations in the region's unbuilt and built waterways. The Regional Council of Lapland promotes the opening of migration routes from the sea to spawning grounds on built rivers. Restoration and revitalisation measures must be taken in existing and potential migratory fish waters to diversify life. Endangered and critically endangered life must be nurtured with special care. It is noteworthy that the Sami cultural and fishing tradition also requires clean waters and viable fish stocks. With the Lapland Convention, the Regional Council of Lapland is also committed to supporting the green transition, which involves both renewable energy solutions and biodiversity.

The River Teno and the River Näätämöjoki are important breeding rivers for Atlantic salmon. North Atlantic salmon stocks have been in decline for a long time in both Europe and North America. Many stocks have been lost and some are on the verge of extinction. Teno salmon is the most diverse salmon stock in the world, but even in River Teno the salmon stocks have declined considerably over the past five years. In addition, Teno salmon has a very high international conservation value. In addition, the Näätämö salmon has an international conservation value. Furthermore, the salmon from Teno River has also cultural, social and economic significance.

Due to the poor state of the Teno salmon stocks, salmon fishing has had to be restricted for three summers in a row. The total ban on salmon fishing has had negative effects on the local community and maintaining the traditional knowledge related to salmon. Salmon



fishing is also linked to livelihoods that are important for municipalities, such as tourism. The migratory fish and alien species humpback salmon spreading strongly into the River Teno and its prevention may further weaken the Atlantic salmon population in the River Tenojoki.

The River Teno is the border river between Finland and Norway. The distribution area and tributaries of the Teno River salmon have been designated as valuable waterways in the regional plan proposal for Northern Lapland in 2040 (av 6584). The marking is based on the conservation biological uniqueness of the salmon and trout populations in the water bodies indicated in the plan, both from a Finnish and global perspective. North Atlantic salmon stocks have been in decline for a long time in both Europe and North America. The reservation basis for the entry is a stream water system that is particularly valuable in terms of nationally endangered species, biodiversity maintenance and fishing. The development principle is to safeguard the special natural and fishing values of the waterway. The Näätämö River in the salmon distribution area and its tributaries have also been designated as valuable watercourses (av 6583) in the same way as the River Teno. When the new regional plan enters into force, it will repeal the previous regional plan for Northern Lapland. The regional plan proposal has been on public display from 7.12.2023 to 16.1.2024. The aim is that the regional plan for Northern Lapland 2040 will be prepared for approval at the meeting of the Regional Council of Lapland on 20.5.2024.

The view of the Regional Council of Lapland

The Regional Council of Lapland considers it important that Finland participates in the process of Norway's coastal zone plan. According to the Regional Council of Lapland's assessment, the plan may have cross-border impacts if the planned activities may have an impact on migratory fish stocks, especially salmon in the River Teno and the River Näätämöjoki. In the future, the Regional Council of Lapland considers it important to pay attention to the possible impacts on migratory fish and to study them further. In particular, the reasons for the decline of Atlantic salmon in the Teno River are poorly understood. There is also confusion about the potential impact of offshore wind power and related power transmission on migratory fish.

Finnish-Norwegian Transboundary Water Commission

The Finnish-Norwegian Transboundary Water Commission has given the same statement to Finnish Environment Institute than they gave to Norway earlier during the Norway's commenting period.

The Finnish-Norwegian Transboundary Water Commission has the following comments on the planning programme:

- The Commission welcomes the establishment of a clear framework for planning and study work through the planning programme. The planning programme defines, among other things, how the environmental impacts of the measure and risk and vulnerability analyses are investigated, and gives different stakeholders the opportunity to review, participate in and influence the work.
- The Commission would like to stress the importance of protecting and conserving common wild salmon and sea trout populations in all parts of their life cycle.



- The salmon populations in the River Teno are particularly important for both the Sámi and the local population on both sides of the border, and we propose that the possible consequences for the Sámi and local culture should be investigated.
- The plan must meet the assessment requirements of the EU Water Framework Directive and carry out consultation in accordance with the Espoo Convention, taking into account transboundary environmental impacts (Espoo Convention, chapter 8).

In addition, the study should respond to and provide alternative mitigation measures if the planned actions have a negative impact on the abovementioned issues. For wild migratory fish, it is particularly important that the overall burden of planned measures and other negative impacts on fish stocks are assessed.

Finnish-Norwegian Transboundary Water Commission wishes to be heard on the matter.

ELY Centre of Lapland

The ELY Centre of Lapland finds it necessary that Finland participates in in the transboundary consultations as provided for by article 10 of the Protocol on Strategic Environmental Assessment.

Service Development Director

Heli Karjalainen

Senior Officer
 Point of Contact for the Espoo Convention
 and the SEA Protocol

Ulla Helminen

Enclosure	The statements received
Distribution	Norwegian Environment Agency
For information	Ministry for Foreign Affairs of Finland
	Ministry of Environment
	The Regional Council of Lapland
	ELY Centre of Lapland
	Finnish-Norwegian Transboundary Water Commission

