

**MULTI-USE PLAN OF PASVIK AND GRENSE JAKOBSELV (2021-2030):  
SUMMARY OF PUBLIC HEARING AND CONSULTATION**



Organization (country)	Input	Is the input taken into revised plan?	Comment/explanation
<p>Andrey Fomenko, Nikel Murmansk regional Duma (Russia)</p>	<p><b>Reconstruction of Skogfoss HEP plant:</b> Russian environmental legislation needs to be observed and interaction (between agencies and companies) should be described in the document</p> <p><b>Fish farming in the Paz river and Lake Inari:</b></p> <ul style="list-style-type: none"> <li>- Joint control of the situation in order to prevent fish diseases in the border areas of the three countries</li> <li>- To plan concrete activities in order to prevent fish diseases in Pasvik-Inari region</li> </ul> <p><b>Syd-Varanger Company</b></p> <ul style="list-style-type: none"> <li>- Information on water abstraction by Syd-Varanger company is incomplete. One should provide more detailed information on the amount of planned water abstraction and places of abstraction.</li> </ul>	<p>Yes</p> <p>No</p> <p>No</p>	<p><b>Reconstruction of Skogfoss HEP plant (Norway):</b> Text on the Menika dam has been updated in the document.</p> <p><b>Fish farming in the Paz river and Lake Inari:</b></p> <p>Answer from Finland:</p> <p>Fishery department (ELY) and LUKE (Finland):</p> <ul style="list-style-type: none"> <li>- Agree to include this as a measure to the Plan of Measures. The responsible authority in Finland is Finnish Food Authority: <a href="https://www.ruokavirasto.fi/en/about-us/contact/">https://www.ruokavirasto.fi/en/about-us/contact/</a></li> </ul> <p>Finnish Food Authority is responsible for inspecting mother fish and fish fry as well for disinfecting the eggs at the Inari Fish Hatchery. Finnish Food Authority is in cooperation with Norwegian and Russian fish health authorities.</p> <p>Proposal for concrete activity: Information exchange between all the Fish farms/Fish hatcheries in Pasvik</p>

			<p>catchment activities in order to prevent fish diseases in Pasvik-Inari region.</p> <p>Answer from Norway (SFTF):</p> <p>In the Norwegian part of the Pasvik river the hydropower company (Pasvik Kraft) is currently obliged to introduce 5000 brown trout per year to compensate for the lost production potential. This is done through fish stockings.</p> <p>There is a project under work between operators, FeFo and SFTF to map the water regulations effects on the brown trout population of Pasvik River. The fish stockings Pasvik Kraft is obliged to conduct will be considered according to the findings in the project.</p> <p><b>SydVaranger Drift AS</b></p> <p>Answer from Norway (SFTF):</p> <p>The mining company Sydvaranger Drift AS has a permission to extract 6000 m<sup>3</sup>/hour of water from the river Pasvik above Boris Gleb (Norwegian-Russian bilateral agreement of 30.04.1976). This permission has so far not been used, and there is no present plan to start using it.</p>
Inhabitant in Nikel (Russia)	Question:	No	Answer from Norway (SFTF):

	Has the damage made by Norwegian reindeer been calculated since the time Pasvik Reserve was set up?		Question has been forwarded to the department for reindeer herding at the County governor's office.
<b>Inhabitant in Nikel (Russia)</b>	<b>Comment:</b> We have been living in Nikel for 10 ten years now and are surprised that the problem with Norwegian reindeer which was topical 10 years ago, has not been solved yet. Norway is the country which has the highest standard of living in the world but it has not provided funding for a not too long protective facilities.	<b>No</b>	Answer from Norway (SFTF):  Question has been forwarded to the department for reindeer herding at the County governor's office.
<b>Inhabitant in Nikel (Russia)</b>	<b>Questions:</b> Have you already discussed the method of compensation for unauthorized grazing of Norwegian reindeer in the territory of the Russian nature reserve? How do you think the compensation should be calculated? Per reindeer or the time they spent in the territory of the reserve should be taken into account? There is no such information in the document. Maybe it is worth mentioning.	<b>No</b>	Answer from Norway (SFTF):  Question has been forwarded to the department for reindeer herding at the County governor's office.
<b>Inhabitant in Borisoglebskiy (Russia)</b>	I have read the document and failed to find information on water abstraction for industrial needs of Syd-Varanger mine. It needs to be added. I would like to know how it will affect the level of water in the Paz River and operation of Borisoglebskaya HEP. The smelter was closed down in Nikel last year, and we hope that nature will restore, but a new round of industrialization starts in the adjacent territory. It is not clear how this will affect our nature in the future, because the plan will be in	<b>No</b>	Answer from Norway (SFTF):  The environmental permit for SydVaranger Drift AS is under revision at the Norwegian Environmental Agency (NEA). In the current permit, Sydvaranger Drift AS has a permission to extract 6000 m3/hour of water from the river Pasvik above Boris Gleb (Norwegian-Russian bilateral agreement of 30.04.1976). This permission has so far not been used, and there are no present plans for the company to start using it.

	use for another 10 years and it causes our concern.		
<b>Inhabitant in Nikel (Russia)</b>	<p>The issue of food safety is of particular interest for me. Nowadays there is no farming in the territory of Pechenga municipality, while there are 12 farms in a small area in Norway. I would like to get more detailed information on fertilizers used in Norway (Section "Agriculture").</p> <p>As for fish and fish stocks, I think it is better to eat pink salmon than farmed "generic" salmon; the latter periodically escapes from cages and has a negative impact on wild salmon population. I understand concern of the Norwegian party regarding conservation of wild salmon population, but artificial stocking can have a potential threat. In my opinion, vets should pay regular visits to the sites. I think you need to provide more detailed information about the problem in the document. Being a local person, I would like to know the state of affairs and suggest adding this information into the text of the document.</p>	<b>No</b>	<p>Answer from Norway (SFTF):</p> <p>Answer from the department for agriculture at the County governor's office:</p> <p>All farmers who apply for production subsidies spread livestock manure and artificial fertilizer according to a fertilization plan. The fertilization plan is made annually and is based on soil samples.</p> <p>The farms must comply to regulations regarding planning of fertilizing, storage and spreading of fertilizers and pesticides. Each year, 10% of the farms are controlled. These controls have not revealed large challenges along the Pasvik river. These results are supported by water chemistry monitoring data. Phosphorous and nitrogen levels are within the thresholds of very good environmental data according to WFD<sup>1</sup> norms and eutrophication is not a problem in the Pasvik river system.</p> <p>Coastal areas are not part of the planning area of the multi-use plan (MuP), and therefore aquaculture have not been a part of the planning topics of this plan. However, aquaculture is a part of management plan of the Norwegian-Finish river basin 2022-2027. This plan covers the Tana, Neiden and Pasvik catchment areas in Finland and Norway. Planning</p>

<sup>1</sup> EU Water Framework Directive.

			authority is the Troms and Finnmark county administration (Troms og Finnmark fylkeskommune)
<b>General same comment from few experts in ELY-centre (Finland)</b>	It is important to show the proper scale of the problems of the different pressures in the Pasvik catchment. In the document, some “small scale” problems look big. But some “big scale” problems look small.	n/a	This document covers different pressures on the environment in the Pasvik catchment. It is not possible in all cases to show the scale of the problems related to each other. Some pressures are described with more detail than others, which might make these factors seem to be more significant issue to Pasvik River catchment. This issue will be addressed in the follow-up part of the project.
<b>Expert, Nature environment effects (Finland)</b>	Is there information of the proportion (%) of the area of different protected areas in the catchment area in different countries? That would reflect to some extent the importance of protection in relation to human activities.	<b>Yes</b>	Map of protected areas has been added along with the information of percentage of protected areas in whole catchment (not per country).
<b>Expert, Nature conservation (Finland)</b>  <b>Forum for Nature and Outdoor life, Finnmark (Norway)</b>	Page 11. To Norway: How certain is the realization of the new protected area?  The Nature Conservation Association in Sør-Varanger that the area from the outer side of Jarfjord to Grense Jakobselv Protected. Now when Russia plans to establish a protected area Norway should follow on the Norwegian side of Grense Jakobselv.  Parts of the area (Småstraumen) were proposed protected as early as the 1980s, and is discussed in Report No. 2 – 1993 from the County Governor of Finnmark -" Verna and	<b>No</b>	Answer from SFTF (Norway):  There are no plans for a nature reserve on the Norwegian side of the border in Grense Jakobselv (Vuorjema).

	protected areas in Finnmark". The area was also included in the conservation plan from 1983.		
<p><b>Experts in Nature environment effects department</b></p> <p><b>(Finland)</b></p>	<p>Industrial wastewater discharges from the smelter in Nikel:</p> <p>Is there any information on the amount of load on water on an annual basis (e.g. nutrients, heavy metals, mercury, POPs, sulphate ion) before closing the smelter?</p> <p>For example, In beginning of 2000's around 26 million cubic metres of wastewater were discharged annually into surface waters, with around 8 million cubic metres discharged into the River Kolosjoki. Despite efforts to reduce the heavy metal levels in these waters, concentrations are still very high. Not only in the waters, but in the sediments as well.</p> <p><b>Still ongoing and effecting activities:</b></p> <p>Is there any information on the amount of load on water from the dumping sites on the bank of River Kolosjoki? The total area of dumping sites covers at least 10 000 hectares. Is there information about the effects of toxic elements that still spread into the waters?</p> <p>What about the load on water and environmental effects of Kaula-Kotselvaara</p>	<b>No</b>	<p>Answer from Pasvik State Nature Reserve (Russia): The question has been forwarded to the Kola GMK company. The answer has not been given yet.</p> <p>Answer from Pasvik State Nature Reserve (Russia): The question has been forwarded to the Kola GMK company. The answer has not been given yet.</p>

	mine? The mine is still operating, it is not closed.		
<b>Expert, Nature environment effects (Finland)</b>	<p><i>p. 38 Pressures from industries on water bodies are registered in Norway in the open database vann-nett<sup>2</sup>. The map 6.4 below sums up the pressures from previous mining on water bodies in the area:</i></p> <p>Is there information on the amount of load on an annual basis? Or the future load of a new, planned mine according to the environmental permit application?</p>	<b>No</b>	<p>Answer from Norway (SFTF)</p> <p>The SydVaranger mine is per 2021 not operated. The environmental permit of the mine is being revised (expected to be done in autumn 2021) and plans for reopening exists.</p> <p>Pressures depicted in the map 6.4 reflect past discharges, not present. The monitoring data from 2019 reflecting effects of past activities are being updated in the database vann-nett. This includes waterbodies outside of and within the planning area of the Multi-use Plan. These monitoring data will be taken into account when the Norwegian Environmental Agency process the environmental permit.</p>
<b>Expert, Nature environment effects (Finland)</b>	<p><i>p. 42 Discharges of nutrients (phosphorous and nitrogen)</i></p> <p>Is there information from Russia and Norway on the sources of nutrient loads into water bodies (percentage)?</p>	<b>No</b>	<p>Answer from Norway (SFTF):</p> <p>In the) classification of waterbodies in Norway according to the WFD (Water Framework Directive), ecological status is assessed by monitoring of the recipient (water body). Ecological status in Norway is not assessed by calculating nutrient loading and calculations of nutrient loadings to the river Pasvik from various sources are not conducted. Monitoring data from Pasvik river ((water bodies in Norway) does</p>

<sup>2</sup> <https://vann-nett.no/portal/>

			<p>not indicate eutrophication from nutrient loadings (N and P).</p> <p>Answer from Russia (Pasvik State Nature Reserve):</p> <p>The answer has been forwarded to the relevant institution. The answer has not been received yet.</p>
<b>Expert, Environmental protection (Finland)</b>	Text about gold panning is quite intense when comparing what is written in the plan about other loads (eg the Russian smelter and the Norwegian mine), it is not possible to make rough interpretations of the effects of gold panning on the entire Pasvik river basin.	n/a	<p>This document covers different pressures on the environment in the Pasvik catchment. It is not possible in all cases to show the scale of the problems related to each other.</p> <p>Some pressures to the aquatic environment are described with more detail than others, which might make these factors seem to be more significant issue to Pasvik river catchment.</p>
<b>Expert, Nature environment effects (Finland)</b>	It would be good to mention more about migration barriers. In Finnish side of Pasvik catchment an extensive migration barrier survey has been made, to verify the number and quality of the barriers.	Yes	A short text and a map about migration barriers will be added to the text.
<b>Civil comment and Fishery Department (Finland)</b>	<p>Request to add information about the problem with getting compensation of environmental damage caused by regulation of Lake Inari.</p> <p><i>According to the state agreement between Russian and Finland, Russia must compensate the damage.</i></p>	No	The matter of compensation is handled between states and is not within the competence of the parties involved in the Pasvik multiuse plan project. There for this matter is not mentioned in the Pasvik multiuse plan document.
<b>Experts Nature environment effect (Finland)</b>	<p>Programme of measures:</p> <p>What are measures</p> <ul style="list-style-type: none"> <li>- when closing the metal production in Kola GMK Pechenga region?</li> </ul>		<p>Answer from Pasvik State Nature Reserve (Russia):</p> <p>The question has been forwarded to the Kola GMK company. The answer has not been given yet.</p>



	<ul style="list-style-type: none"> <li>- concerning the dumping sites and mines that are still operating?</li> </ul>		
<b>Expert, Fishery department (Finland)</b>	<p>Programme of measures:</p> <p>Measure 6.3</p> <p>In addition to these rivers, it is equally important to continue monitoring juvenile production in the main stream of the Ivalojoki River and in the Juutuanjoki and Siuttajoki rivers.</p>	<b>Yes</b>	This matter is included in Programme of measures.
<b>Expert, Fishery department (Finland)</b>	In order to determine the effects of gold mining, it is also important to study juvenile production in the main stream of Ivalojoki river	<b>Yes</b>	This matter is included in Programme of measures.
<b>Expert, Fishery department (Finland)</b>	<p>Programme of measures; Measure 6.2:</p> <p>The responsible institutions lack operators here, some of whom have been set in the environmental permit, e.g. an obligation to participate in fisheries monitoring and of which should be promoted as far as possible.</p>	<b>Yes</b>	Operators are added as one of the responsible institutions.
<b>Sydvaranger Drift AS, (Norway)</b>	<ul style="list-style-type: none"> <li>- Name of the enterprise needs to be corrected in the text to “Sydvaranger Drift AS”</li> <li>- Sydvaranger Drift AS are not applying for a new environmental permit as stated in the document. Sydvaranger Drift AS has an environmental permit, but this is under revision at the Norwegian Environment Agency.</li> <li>- Correction about the draining path for water: It is not going through</li> </ul>	<b>Yes</b>	Mistakes in text are corrected.

	<p>Ørnevatnet into the Pasvik catchment, it is going through Krokvatnet and Lillevann-Reitanvatn and by Fossevatn it is draining to Pasvik River.</p>		
<p><b>SVJFF Sør-Varanger hunter and fishing association (Norway)</b></p>	<p>1. Counting and governance in Grense Jakobselv river: the association struggles to do something about Pink Salmon in this river, it is too much speculation and too little research. The amounts received to eradication of Pink Salmon is too low for the local hunting and fishing association, and should be coordinated by the County Governor of Troms and Finnmark – or connected to serious research-measures were eradication and governance was taken in as working packages.</p> <p>a. In Grense Jakobselv we (the hunting and fishing association) needs help to count and eradicate Pink Salmon. Today it is only done by fishing with fishing poles. The counting conducted today are too unsystematic. To systematize data about Pink Salmon, sea trout, sea char and Atlantic salmon, electronic counting is proposed. It is hard to conduct correct counting's above the Lasarus deep pool</p>	<p><b>No</b></p>	<p>Answer from Norway (SFTF):</p> <p>1. In Norway, the Ministry of Climate and the Environment (KLD) are currently assessing a draft of a national action plan to combat pink salmon in Norway. The new action plan will establish and detail national policies on pink salmon further.</p>

	<p>because of lakes in the river system.</p> <p>b. Taking in cameras, traps and nets into the plan of measures will be very important for the management of the river.</p> <p>2. Salmon in Pasvik River is almost not mentioned. The County Governor of Troms and Finnmark should aim to get an overview of and secure DNA from the salmon stock that belongs to the Pasvik River. Theoretically, it is possible to get a management of the salmon of the Pasvik River with adaption of measures for development of spawning and nursery-areas for the salmon which belongs there today, and build up this resource for the future. The Salmon stock of Pasvik River has probably a longer historical relevance than the trout stock, but measures to secure the salmon stock does not have to be in competition with the management of Brown Trout in the river.</p>	<p><b>No</b></p>	<p>2.Text on salmon will not be extended in the current document due to time constraints, but it will be possible to follow up the salmon issue in later revisions of the PoM.</p>
<p><b>Forum for Nature and Outdoor life, Finnmark (Norway)</b></p>	<p>We recommend that measures are taken to strengthen the production base for trout. E.g. laying spawning gravel and stone in the rapids of</p>	<p><b>No</b></p>	<p>Answer from Norway (SFTF):</p> <p>A project between the hydropower company (Pasvik Kraft), the land owner (FeFo) and the County Governor (SFTF) is under work to map the water regulations effects on the brown trout population of</p>

	the Pasvik river and possibly in certain tributaries to compensate for the loss of natural trout production due to regulations		Pasvik River. The fish stockings which Pasvik Kraft are now obliged to conduct will be considered according to the findings in the project.
<p><b>Forum for Nature and Outdoor life, Finnmark (Norway)</b></p> <p><b>Sør-Varanger Nature Conservation Association (Norway)</b></p>	<p>We want the mass extraction of pine forests in Pasvik for industrial purposes to be stopped. It is today mainly industrial use of pine for biofuels. Such use is very unsustainable. In Pasvik, where pine takes a very long time to grow, such extraction is more to compare with mining than common forestry. It is not understandable that pine from Pasvik is preferable to other tree species for biofuels, such as birch that is more common in the region and has better growth.</p> <p>Extraction of pine in Pasvik must be limited to private purposes or to local sawmills that uses limited amount of timber for high value creation of wood products for local use.</p> <p>It is directly applicable within the framework of multi-use plan is that the drainage of marsh and potential change in the runoff is a real risk from the machinery used in the forestry in Pasvik today. This is an issue that requires measures and not only a description in the background document.</p>	<b>No</b>	<p>Answer from Norway (SFTF):</p> <p>Answer from department of Agriculture at the County Governor's Office:</p> <p>Both the department of Agriculture at the County Governor's office (forest authority) and Fefo (The Finnmark property, landowner) focuses on using the forest sustainably for what creates the greatest possible value locally. We work to ensure that local sawmills process local timber into well-paid products. At the same time, we have to manage the large areas with younger forests, and we cannot use this forest for sawmill production.</p> <p>Forestry in Pasvik is an activity that follows the laws and regulations that forestry in Norway must comply with. As 70% of the pine forest in Pasvik is in felling class 3 and 4 (younger forest), thinning is the main activity in forestry in Pasvik and Finnmark today. By thinning, we achieve increased growth and increased quality of the remaining trees.</p> <p>There is little birch near the road in the municipality. If one is to operate industrially on birch, it entails a long operating road, which in turn will lead to damage to vegetation and poor economy.</p> <p>The forestry activities imply the use and driving of machinery in the terrain as well as the disposition of</p>

			dead plant material in the forest bottom which potentially may cause erosion and nutrient run-off. However, flat terrain, low precipitation and draining masses in the Pasvik valley, helps reduce the risk of erosion and nutrients leaking into the water systems.
Forum for Nature and Outdoor life, Finnmark (Norway) and Sør-Varanger Nature Conservation Association (Norway)	<p>We want a collaboration between the County Governor, local science institutions and the military. This is for the sake of birds and fish when the military's fast-moving vessels are put into service. There are telling of changes in the bottom conditions of several rapids, after heavy vessels with were used by the military. Fishermen believe there is a risk of this vessels affecting spawning conditions, as well as the fact that spawning pits have been destroyed.</p> <p>With regard to the use of water jets, it has already been pointed out in the statements for water management plans that these should not have the right to use in freshwater sites, both for the sake of to birds and for the increased risk that the water jet unit represents for the spread of undesirable species such as Gyrodactylus salaris or "waterplague" -Elodea canadensis, which already have arrived in northern Sweden and Finland.</p>	No	<p>Answer from Norway (SFTF):</p> <p>These issues are addressed in yearly meetings between the County Governor and the military.</p> <p>The County Governor of Troms and Finnmark will follow up on this issue in further work.</p>
Forum for Nature and Outdoor life, Finnmark (Norway)	We support the proposal to start fighting the Tromsø palm tree in Grense Jakobselv (proposal given at public meeting in May 2019).	No	Answer from Norway (SFTF):

	In the border area, a filtered search on the species data bank we have found 211 registrations of 26 different tax zones of blacklisted plant species with potentially high to very high risk. Other species groups such as marten dog or muskrat of course, also need to be taken into account.		The Tromsø palm tree is not included in the PoM of this plan. However, the County Governor will investigate and map the occurrence and distribution of this species and consider measures.
<b>Forum for Nature and Outdoor life, Finnmark (Norway)</b>	We also pointed out in our submission to the water management plan that king crabs should not be allowed to grow above a sustainable level. That is, a level that causes the state of the environment to deteriorate to below environmental goals "good ecological" and "good chemical condition", which is neither positive for the environment nor fishermen. We also supported previous proposals from the County Governor to establish a index suitable for measuring the environmental impact of king crabs.	<b>No</b>	Answer from Norway (SFTF):  The multi-use plan does not cover coastal areas. The issue concerning king crabs is not a planning topic of the multi-use plan. For king crab effects on water bodies, please refer to the management plans of the Norwegian- Finnish river basin management district.
<b>Sør-Varanger Nature Conservation Association (Norway)</b>	Deposits of mining waste can pose a major risk to both local pollution of chemicals and heavy metals, and the spread of nanoparticles and microplastics to the sea. These risks must at a greater extent be reflected in the quality criteria used to characterize the aquatic environment.	<b>No</b>	Answer from Norway (SFTF):  The issues related to discharges into Bøkfjorden are not part of planning topics and outside the planning area of the Multi-use Plan. The issue is addressed the joint Norwegian-Finish river basin management plan (2022-2027).

<p><b>Forum for Nature and Outdoor life, Finnmark (Norway)</b></p>	<p>Discharges from the ore mine at Bjørnevatn, have caused high pollution by sedimentations, heavy metals and other chemicals to Bøkfjorden and several water bodies in the Varangerfjorden Langfjorden is also affected after direct discharge of water from the quarries.</p> <p>A new permit is being processed; at further operation, it is requested to dispose of 4 million tonnes of suspended substances and 73 tonnes chemicals annually, and that drainage water from mining is discharged into langfjorden's catchment area and in Pasvik river catchment area via Krokvatnet and Lillevatn. As always, where financial interests stand strongest, environmental considerations are weakest.</p> <p>The same applies to hydropower, aquaculture industry, oil industry, etc. We've never been able to get used to this paradox, not in this case either.</p> <p>For good international environmental cooperation, a requirement should be set for:</p> <ol style="list-style-type: none"> <li>1. Old deposits in Bøkfjorden and Langfjorden is cleared up to allow the habitat and levels of</li> </ol>		<p>Issues concerning drainage of mining water to Krokvatnet and Lillevatnet, and thus to the Pasvik River catchment, are described in the Multi-use Plan, chapter 6.</p> <p>SydVaranger mine is per 2021 not operated. The environmental permit of the mine is being revised by The Norwegian Environmental Agency (expected to be done by the autumn of 2021) and plans for reopening exists.</p> <p>Monitoring data (found in the vann-nett databse) will be taken into account when the Norwegian Environmental Agency will process the environmental permit.</p>
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	<p>heavy metals to returned to the state of nature. This is supposed to come as a licensing injunction to Syd-Varanger AS, on the polluter-payer principle.</p> <p>2. If mining is restarted, waste masses shall be treated on land according to the best environmental solution, regardless of costs. Returnal of deseperated mining waste and disposal in empty quarries should be possible to carry out with the railway that run with empty wagons back to Bjørnevatn.</p>		
<p><b>Forum for Nature and Outdoor life, Finnmark (Norway)</b></p>	<p>During this year's Pasvik seminar, it was pointed out that there are, in Nikel, several sedimentation pools with a high content of nickel and other contaminated substances. We want these, at least followed up, and preferably cleaned up.</p>	<p><b>No</b></p>	<p>Answer from Pasvik State Nature Reserve (Russia): The question has been forwarded to the company. The answer has not been received yet.</p>
<p><b>Forum for Nature and Outdoor life, Finnmark (Norway) and Sør-Varanger nature conservation association (Norway)</b></p>	<p>Coastal area at Russian border outer Varangerfjord shows signs of nutrient pollution, with satisfied data series on phosphorus (EcoKyst), as well as simple total nitrate and hexaclorbenzene (vann-nett). We have pointed out in a number of statements that the aquaculture industry from both the Norwegian and Russian sides is the biggest reason for the deteriorating environmental state.</p>	<p><b>No</b></p>	<p>Answer from Norway (SFTF):  Coastal areas are not part of the planning area of MuP, and therefore aquaculture have not been a part of the planning topics of this plan. However, aquaculture is a part of management plan of the joint Norwegian-Finish river basin management plan 2022-2027. The nutrient data from aquaculture are uncertain and are being checked out through this work.</p>



	(which can be verified in the following sources: Institute of Marine Research, seafood database (for hexachlorbenzen), NIVA report L.NR. 7438-2019 (for nutrients)). We expect action against the achievement of the environmental target as required by the Water Directive.		
<b>Forum for Nature and Outdoor life, Finnmark (Norway)</b>	Hunting forest birds in Pasvik is very popular for both locals and visitors. Statistics Norway's figures show significant fluctuations in the large bird population, while the black grouse population has decreased since 2014. It is possible that several scattered, smaller, protected areas against hunting corresponding to important areas of the birds may have a positive effect on forest bird populations and thus hunting.	<b>No</b>	Answer from Norway (SFTF):  This issue is not a planning topic for the Multi-use Plan.
<b>Forum for Nature and Outdoor life, Finnmark (Norway)</b>	There is a clear growing interest in tourist transport in the border area. Pasvik national park and the path to Ellenkoia, among others, is a good example for channeling the tourist mass, which limits the spread. In accordance with the increasing traffic, further measures should be taken be considered, for example by temporary prohibition (or requests) against traffic during nesting time.  There are still some popular exits that lack toilet facilities. There especially on	<b>No</b>	Answer from Norway (SFTF):  Tourism and its effect on the environment is described in the Multi-use Plan document. These further comments are forwarded to Øvre Pasvik national Park and to Sør-Varanger municipality.

<p><b>Sør-Varanger Nature Conservation Association (Norway)</b></p>	<p>Utnes (bathing place), Melkefoss (bathing and fishing spot) and Skogfoss (fishing spot). This is roads all the way to the front, which are often used as campsites and are frequent visited by both locals and visitors during the summer months</p> <p>Actors in tourism, administration and rights holders must be required to provide information, and must be supported with the preparation of information posters (Measures to prevent the spread of gyrodactylus salaris, the spread of alien species, etc.). River owners (for example FeFo) should be required to put up warning posters against these dangers at all exits to the rivers to which they sell fishing licenses.</p>		<p>Answer from SFTF (Norway) Information material to prevent the spreading of Gyrodactylus Salaris is produced by the Norwegian Food Safety Authority. Fishing right holders have a responsibility to provide information in the watercourse they manage.</p>
<p><b>Forum for Nature and Outdoor life, Finnmark (Norway) and Sør-Varanger Nature Conservation Association (Norway)</b></p>	<p>In the event of erosion control measures, one should seek to avoid destroying areas suitable for the establishment of sandals (Riparia riparia) that are in drastic decline in Norway and characterized by as NT in the species data bank. Erosion is a premise for providing areas suitable for establishment of colonies for this species.</p>	<p><b>No</b></p>	<p>Answer from SFTF (Norway):  This comment is forwarded to the responsible governmental agency - Norwegian Water Resources and Energy Directorate (NVE).</p>
<p><b>Sør-Varanger Nature Conservation Association (Norway) and Øvre Pasvik National Park Board (Norway)</b></p>	<p>Overgrowth of shallow areas are becoming a problem in the Pasvik River. This should be considered as an issue that requires measures in the Multiuse Plan also outside the protected areas.</p>	<p><b>No</b></p>	<p>Answer from SFTF (Norway)  The issues of overgrowth and change in river environment are described in the background document of the Multiuse Plan (chapter 6.3). Measures to avoid further overgrowth will first be</p>

			considered in the protected areas where the County Governor of Troms and Finnmark are managing authority. This will be considered in accordance with the management plan in the protected area of the river.
<b>Sør-Varanger Nature Conservation Association (Norway)</b>	Methodology for sampling must be considered to when assessing aquatic ecosystems. If quality criteria's for assessing aquatic ecosystems are located at the bottom, it is pointless to limit oneself to taking measurements at the surface.	<b>No</b>	Water samples from the Pasvik river are conducted at various depths of the watercourse and not only in the surface.
<b>Sør-Varanger Nature Conservation Association (Norway)</b>	SFTF does not want to do anything with the input to set limits on the extent of water level changes to take into account bird life and nesting at the water's edge. We will here refer to the management principles in the Biodiversity Act § 15, ref the duty of care in § 6, with a requirement that "In any activity, unnecessary damage and suffering to wild animals and their nests, nests or dens shall be avoided."	<b>No</b>	Answer from SFTF (Norway): SFTF are not authority for the matter of water regulations. Water regulations are described in chapter 6.3 in the Multiuse Plan Document.
<b>Øvre Pasvik National Park Board (Norway)</b>	The description of the Pasvik-Inari trilateral park in the MuP-document needs updates with information about responsible managing authority for the different protected areas. We	<b>Yes</b>	Text and measures are updated according to suggestions.

	<p>propose the text from Annex 17.08.2020 to the cooperation agreement for the trilateral park. In addition, it should be mentioned that Pasvik-Inari trilateral park has been a certified EUROPARC Transboundary Park since 2008 (Recertified in 2013 and 2018).</p> <p>The National Park board also suggest additions to the text to reflect the facilitation in the borders of and in inside the protected areas to concentrate tourist flows.</p> <p>In measure 9,1 Øvre Pasvik National Park Board must be responsible institution not only Øvre PAsvik National Park.</p> <p>In measure 9.5 Øvre Pasvik National Park as responsible institution from Norwegian side</p> <p>New Measre about development of nature-friendly / sustainable traffic with vessels on water and watercourses that take vulnerable nature and other users into account with Øvre Pasvik National Park Board as responsible institution.</p> <p>The National Park Board proposes a more comprehensive description of NIBIO Svanhovd as the responsible Norwegian institution in section 4.2 and section 4.4</p>		
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	<p>NIBIO Svanhovd performs many of these tasks in its capacity as an authorized Visitor Center for Øvre Pasvik National Park. This should appear in the table, for example as «NIBIO Svanhovd / Visitor Center Øvre Pasvik National Park».</p>		
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