

EFTA Surveillance Authority  
Rue Belliard 35  
B- 1040 Brussels  
Belgium

Vår dato  
19.05.2015

Vår referanse  
2015/00178-2

Vår saksbehandler  
Jan Henrik Sandberg/97682469

Deres referanse

## **Complaint: Norway has failed to comply with the Water Framework Directive - Support letter from the Norwegian Fishermen's Association**

The Norwegian Fishermen's Association (NFA) is a politically independent organization, representing the Norwegian fishing fleet. The organization is based on voluntary membership of professional fishermen and has approximately 5000 members ranging from large vessel owners, to deckhands and small-scale coastal fishermen. Our fields of priority include protection of coastal waters, breeding and nursery-areas and seafood safety.

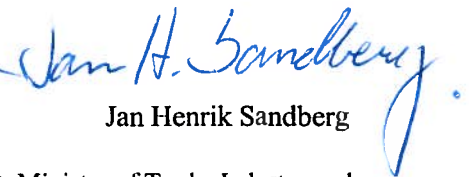
The Norwegian Fishermen's Association hereby confirms its support of the contents of the complaint from the Friends of the Earth Norway and others to the EFTA Surveillance Authority, dated May 19 2015. The NFA believes it is important that the ESA does a detailed assessment of permits for dumping mining waste in fjords, to consider if they are in accordance with the provisions of the EU Water Framework Directive.

The complaint refers to the fact that the Ministry of Climate and Environment recently has published a guidance document<sup>[1]</sup> on § 12 of the Norwegian water regulations (article 4.7 of WFD). It is the opinion of the NFA that this guidance document fails when it comes to the assessments of risks and benefits in connection with new projects, including permits for dumping mining waste. In our opinion this guidance document should have had a broader assessment due to adverse effects on breeding and nursery-areas, seafood safety, coastal fisheries and other industries/interests that are dependent of good ecological and chemical status in coastal waters. It should be mentioned that his guidance document was compiled and published without any transparency, consultation or public participation.

The NFA would be glad to be given the opportunity to inform the ESA closer about the organization's views on these matters.

**Best regards**  
**The Norwegian Fishermen's Association**

  
Jan Birger Jørgensen

  
Jan Henrik Sandberg

Copy: Friends of the Earth Norway, Ministry of Climate and Environment, Ministry of Trade, Industry and Fisheries, Norwegian Environment Agency, Directorate of Fisheries, Norwegian Food Safety Authority.

<sup>[1]</sup> <http://www.vannportalen.no/globalassets/nasjonalt/dokumenter/publikasjoner--veiledning/veiledning-til-vannforskriften--12--endelig.pdf>