

NATURE SCORE CARD



**Finland**

Finland has been a member of the European Union since 1995. Its Natura 2000 network consists of 1865 sites, covering 55988 km<sup>2</sup>. Terrestrial sites are covering 48847 km<sup>2</sup> (14.45% of the land area) while marine N2000 sites are covering 7140km<sup>2</sup>. The below analysis and recommendations suggest that national authorities still need to make further efforts in order to fully implement the Birds and Habitats Directives and effective conservation of threatened species and habitats to be achieved on the ground.

	<ul style="list-style-type: none"> <li>• Transposition</li> </ul>
	<ul style="list-style-type: none"> <li>• Site designation</li> <li>• Management of sites</li> <li>• Species protection</li> <li>• Avoid deterioration of sites, disturbance of species and implementation of appropriate assessments</li> <li>• Landscape connectivity</li> <li>• Habitats and species monitoring</li> <li>• Promotion of research</li> <li>• Non-native species</li> <li>• Stakeholder engagement, public participation and communication</li> </ul>
	<ul style="list-style-type: none"> <li>• Funding &amp; resources</li> </ul>

**ACTION PLAN FOR NATURE IN FINLAND**

<p><b>Transposition and designation</b></p> <ul style="list-style-type: none"> <li>• The Designation of more sites, especially in Southern Finland.</li> <li>• Increased protection of old-growth forests and peatlands.</li> <li>• N2K network is also inadequate in marine areas (e.g. shallow banks important for water birds) and on agricultural land.</li> </ul>	<p><b>Prevention of negative impacts</b></p> <ul style="list-style-type: none"> <li>• Increasing the independency of consultants in EIA.</li> <li>• Increased information for municipality's detail of the Habitats and Bird Directives.</li> <li>• Revising the Wolf action plan.</li> </ul>
<p><b>Active management to achieve favourable conservation status</b></p> <ul style="list-style-type: none"> <li>• Increase staff working in environmental administration and Natura 2000 sites. Staff: even Metsähallitus (the most important manager) is losing staff and knowledge.</li> <li>• Better management for forest N2K areas.</li> <li>• There are many Natura 2000 areas which are not nationally protected by Nature Conservation Act, but by weaker tools, as Forestry Act, Outdoor Recreational Act.</li> </ul>	<p><b>Funding</b></p> <ul style="list-style-type: none"> <li>• Greater funding for the management and restoration of protected areas, filling the gaps in the protected area network using funding from other programs such as the CAP.</li> </ul>
<p><b>Monitoring and research</b></p>	<p><b>Stakeholder engagement</b></p> <ul style="list-style-type: none"> <li>• Improving the NGO participation in making of PAFs and regional N2K management plans.</li> </ul>

*The information in this scorecard is based on expert analysis from BirdLife Finland, WWF Finland and Finnish Association for Nature Conservation. Full details on the following pages.*

LEGAL REQUIREMENT	STATUS IN FINLAND
<p><b>Transposition</b></p>	
<p><b>Site designation</b></p> <p>Designate and establish sites that form the Natura 2000 network of protected areas</p> <p><i>Habitats Directive, art. 3 &amp; 4</i> <i>Birds Directive, art. 3 &amp; 4</i></p>	<ul style="list-style-type: none"> <li>Natura 2000 network covers about 50 000 km<sup>2</sup> of which 75% is terrestrial and 25% marine and inland lakes. There are 1721 SACs covering 48 000 km<sup>2</sup> and 468 SPAs covering 31000 km<sup>2</sup>. There is much overlap between SACs and SPAs, so the total amount of Natura 2000 sites is 1865 (of which 87 sites are situated in the autonomous Åland islands). The network covers about 15 % of Finland but is geographically very biased with most of the area located in Northern Finland. The network is currently being updated but there will still be obvious gaps in southern Finland and in marine areas, especially considering important offshore areas for waterbirds, traditional rural habitats and in general terrestrial areas in Southern Finland.</li> <li>There are some marine areas under preparation but NGOs anticipate there will be gaps with e.g. Eider, Long-tailed Duck and Velvet Scoter.</li> <li>There are lots of national protected areas, which are not in the Natura 2000 network. For example, there are still nationally protected bird wetlands which are not designated as SPAs. Many Natura 2000 areas are nationally protected by very weak laws. For example, several forested Natura 2000 areas are protected only by Forest Act, Outdoor Recreation Act or Land Extraction Act, which allows business-as-usual forestry within the area (except at particular Habitats Directive Annex I habitat types which may comprise a minor part of the area). Of course, the conservation targets of the Habitats Directive should be more important than national implementation tools of Natura 2000 areas, but many developers and authorities don't understand this properly.</li> </ul>
<p><b>Management of sites</b></p> <p>Establish site protection measures in Natura 2000 sites</p> <p><i>Habitats Directive, art. 6(1)</i> <i>Birds Directives, art. 4(1) &amp; 4(2)</i></p>	<ul style="list-style-type: none"> <li>Conservation objectives are usually defined in the management plans and, at more general level, regional Natura 2000 plans.</li> <li>In many cases, the objectives are set at too general level such that the specific requirements of the key species or habitats of the site are not taken into account</li> <li>There are management plans for 80 % of the geographic area of Natura 2000 areas but only 20 % for sites, i.e. small sites are not yet planned (source: PAF report).</li> <li>There are huge differences in the quality of management plans: there are good ones but also many very weak ones. In bird wetlands there are even negative measures for birds (e.g. not measures against succession and no new habitats).</li> <li>This is perhaps the biggest gap in the Finnish Natura 2000 network now. There is a severe lack of funding for the implementation of critical management and restoration measures identified in the management plans, such as permanent management of wetland SPAs, controlled burning of forests and restoration of mires. Instead, much funding is directed to develop the infrastructure for tourism in Natura 2000 areas.</li> <li>Metsähallitus (formerly Finnish Forest and Park Service) is the authority responsible for the management of state-owned land, and today also for the management of private conservation areas.</li> <li>No, this is a new thing in Finnish management planning.</li> </ul>
<p><b>Species protection</b></p> <p>Ensure species protection</p>	<ul style="list-style-type: none"> <li>There are not many derogations for the Habitats Directive species (Annex IV a) managed by environmental authorities, but hundreds of derogations for large carnivores (e.g. Wolf, Bear, Lynx etc.) managed by game authorities. Game authorities also give more derogation according to Birds Directive</li> </ul>

*Habitats Directive, art. 12-16*  
*Birds Directive, art. 5-9*

Article 9 than environmental authorities. These derogations are often not considered justified by NGOs and complaints are regularly sent to the Administrative Courts.

- There are action plans for many directive species, but some of them are old. Many of them are not implemented and monitored. There is an urgent need to update many old management plans.

**Avoid deterioration of sites, disturbance of species and appropriate assessment**

Ensure no deterioration of habitats and disturbance to species in Natura 2000 sites

*Habitats Directive, art.6(2)*

Ensure that plans or projects likely to affect Natura 2000 sites are subject to appropriate assessment

*Habitats Directive 6(3)*

Ensure that developments affecting the integrity of the site are not approved unless there are no alternative solutions, and for imperative reasons of overriding public interest and if compensatory measures are taken

*Habitats Directive 6(4)*

- In principle, HD 6(2) has been only recently implemented in Finland, and there are not many cases yet showing how national implementation works.
- HD 6(3) is implemented in Nature Conservation Act, and it is studied in most EIAs. However, there are gaps especially in loggings close to N2K areas.
- There are still ongoing problems regarding logging in forest N2K areas even in state-owned forests. In many cases, environmental authorities don't require proper N2K assessments for projects of plans, usually there are not enough resources for field work.
- Due to a certain interpretation of the polluter pays principle, companies or developers can choose the consultant. This leads to problems especially in conclusions of the report. In small countries like Finland, the expert may lose work opportunities in the future if she/he makes very critical assessments.
- There are big differences in the adverse effects on site correctly assessed as defined by the conservation objectives and status of the sites. Sometimes conclusions are not in the line of the results of the fieldwork. In some cases there has been critical assessments stopping even the whole project such as Vuotos dam plan, but not many.
- In many cases developers are afraid of N2K due to the precautionary principle. If it is clear that a project causes very harmful effects, it is usually said clearly in assessment – but in the cases where this harm is not so clear, the precautionary principle is not used well. In general spatial plans the responsibility to make a proper assessment is left to more detailed planning.
- In Finland we have not had a single "overriding public interest" case of HD derogations for N2K due to Article 6 yet

**Landscape connectivity**

Encourage the management of landscape features to improve the ecological coherence of the Natura 2000 network

*Habitats Directive art. 3(3) & 10*

- The biggest gap in land connectivity is Southern Finland, where only a small percentage of the area is part of the Natura 2000 network and these sites end up being isolated. Most of our big N2K areas are in Northern Finland and there connectivity can be considered good.
- Even with other protected areas, the biggest gap is Southern Finland, where there is only some portions of the area protected, and this can't make a proper network. More sites (particularly forests and mires) need to be protected by Nature Conservation Act in Southern Finland, which requires political will and adequate funding for land purchase. For example, the list of sites for the additional conservation programme for peatlands has been ready for many years, but last Governments don't establish it because of political reasons.

**Funding and resources**

Identify funding needs

*Habitats Directive, art. 8*

- There is a prioritized Action Framework, but it lacks special budgeting from any EU specific funds.
- For the programming period of 2014-2020 372 million Euros have been allocated, but in reality this is an insufficient amount. The funding plan has not been implemented. On the contrary, the current Government has cut the financing of nature conservation very hard.
- PAFs fall within the budget allocated for the Ministry of Environment. However, there is no dedicated budget from the National or European funds

	<p>for Natura 2000.</p> <ul style="list-style-type: none"> <li>• There is a significant shortfall in staff members, this is mainly due to management's dependency on project money.</li> </ul>
<p><b>Habitats and species monitoring</b></p> <p>Undertake monitoring of the conservation status of habitats and species of Community importance</p> <p><i>Habitats Directive, art.11</i></p>	<ul style="list-style-type: none"> <li>• The populations of some species groups, particularly birds, are monitored at national level in Finland based on a systematic sample of count points or routes. However, site level monitoring (e.g. monitoring populations of trigger species in individual Natura 2000 areas) is not done on systematic basis or is completely lacking.</li> <li>• For most species groups and habitats, we have very good knowledge which allows for reliable assessment and data produced of the conservation status at national level, but not at site level.</li> <li>• Data is publicly available, mainly the results and at least for specialists and professionals working for the administration.</li> </ul>
<p><b>Promotion of research</b></p> <p>Encourage research and scientific work</p> <p><i>Habitats Directive, art. 18</i> <i>Birds Directive, art. 10</i></p>	<ul style="list-style-type: none"> <li>• In general, scientific research on threatened species is poorly supported in Finland, especially in the universities. Basic monitoring is done mainly by state-funded organizations. There is monitoring for endangered birds – but no research is carried out on reasons for the decline. However, there have been some state funded research programs such as the PUTTE programme to assess the status of poorly known species groups. In addition, the monitoring of many species groups is conducted through citizen science volunteers.</li> </ul>
<p><b>Non-native species</b></p> <p>Ensure that introductions of non-native species do not prejudice native habitats and species</p> <p><i>Habitats Directive, art. 22</i> <i>Birds Directive, art. 11</i></p>	<ul style="list-style-type: none"> <li>• We have now a national IAS strategy (2012) and it is taken into account in some management plans. Most of the measures are against mammals such as the American mink and the Raccoon dog, but not enough measures have been put in place against invasive plants which can significantly change the habitats and endanger plant/insect species. In addition, also some IAS fish species are overlooked.</li> </ul>
<p><b>Stakeholder engagement, public participation and communication</b></p> <p>Stakeholder engagement and public participation are key to ensuring effective implementation</p>	<ul style="list-style-type: none"> <li>• There are obligatory public hearings for the site designation process, but the Ministry of the Environment doesn't take properly into account proposals from environmental NGOs.</li> <li>• There is adequate stakeholder participation in the development of management plans</li> <li>• There is adequate public participation before approving management plans.</li> <li>• In the case of granting authorisations under article 6, there are many cases in which EIAs or other assessments are conducted and which there are public hearings.</li> <li>• In most cases there is full transparency and public participation in decision making which impacts on nature. The largest gap remains with forestry within N2K sites. This is the case because there are no modern processes available to access information, participation and access to justice for NGOs due to Forestry Act.</li> <li>• There is deficit in awareness raising on the activities of Natura 2000 due to ongoing opposition at the national and regional level of its implementation.</li> <li>• There is no Natura 2000 communication strategy at the local level.</li> </ul>

## RECOMMENDATIONS FOR FINLAND

1. More funding is needed especially for the management and restoration of protected areas, and also for filling the gaps in the protected area network. In particular, permanent budget funding is needed for habitat management instead of relying on project funding. The Finnish Association for Nature Conservation estimated before the current Government programme that the Ministry of the Environment alone requires 100 million Euros more per year to finance the National Biodiversity Strategy and Action Plan, new conservation programme for mires, new national parks etc. However, the needs of restoration activities estimated in national ELITE project are even many times bigger. On contrary, the new Government has cut two thirds of the existing nature conservation money in 2015. Some of this money has been put back to the budget for 2018 but there is still a vast gap between money and needs. In addition, Finland is not using CAP possibilities to fund forest N2K management plans.
2. Designation of more sites, especially in Southern Finland. More old-growth forests and peatlands should be protected and N2K network is also inadequate in marine areas (e.g. shallow banks important for waterbirds) and on agricultural land.
3. Developing new management plans where they are still lacking and updating old ones, and securing funding for full implementation of the plans.
4. Increase staff working in environmental administration and Natura 2000 sites. Staff: even Metsähallitus (the most important manager) is losing staff and knowledge.
5. Better management for forest N2K areas there are many Natura 2000 areas, which are not nationally protected by Nature Conservation Act but by weaker tools, as Forestry Act, Outdoor Recreational Act etc. In these areas conservation targets of the Habitats Directive are in danger because of lack of habitat maps, management plans taking into account also connectivity and Habitats Directive Article 6.2 requirements, lack of appropriate assessments, lack of public participation etc.
6. The independence and resources of environmental administration should be safeguarded, especially in regional councils and municipalities. There is going on the biggest change of regional administration in Finland. All officials working in current Centres of Economic Development, Transport and the Environment with water, fisheries and regional planning are going to counties. Half of staff working with nature conservation is going to counties and another half to new state body National Licensing and Supervisory Authority in 2020. In counties the power lies with regional politicians, which can lead to decisions on staff and budget cuts, and can be harmful for biodiversity targets. In addition, municipalities are getting more power and freedom e.g. in spatial planning. In municipalities there is a lack of knowledge about Habitats and Bird Directives. It has been observed that in some cases local politicians don't respect N2K areas. This is why the changes in regional administrations can cause severe problems in the future.
7. Implementation of existing species action plans and development of new ones for a selected range of species over the coming years, in particular: More species action plans are needed such as the Habitats Directive species in unfavourable conservation status, for southern populations of the Baltic Ringed seal in , and Flying Squirrel etc. In addition, Wolf action plan should be revised because we have lost half of the population in recent years.
8. The independency of consultants in EIAs should be developed, for example such that the

consultant would be selected by environmental authority, not by the company.

9. The interpretation of derogations should be unified between game and environmental authorities.
10. NGO participation in making of PAFs and regional N2K management plans should be improved. Last time environmental NGOs were not consulted in PAFs. Sometimes eNGOs are consulted in regional N2K plans, sometimes not.