

Svalbard Science Forum

Det Kongelige Miljøverndepartement
Postboks 8013 Dep
0030 Oslo

Your ref: 200505015

Date: 19.08.2010

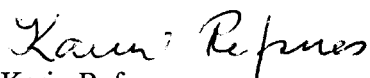
Hearing statement regarding “Hearing note proposition concerning the Law on amendment of the Svalbard Environmental Protection Act 15. juni 2001 nr.79”

Svalbard Science Forum (SSF) in accordance with its mandate to promote the interests of science in matters that will influence scientific activities in Svalbard would like to comment on the proposition of amendments of the Svalbard Environmental Protection Act.

In general, SSF would like to emphasize the importance for the science community to be able to conduct research - also in protected areas on Svalbard, in addition to clear and transparent procedures for permit applications. Furthermore, SSF would like to draw attention to the increasing use of remote operated vehicles for research purposes (e.g. aerial unmanned vehicles and autonomous underwater vehicles) and a potential need for clear rules concerning the deployment of such equipment.

Even though it has not been evaluated in detail whether a framework for fees in Svalbard is needed (Hearing note p. 23, 6.6.2.), SSF, in connection with the proposed alterations in chapter VIII § 92 Svalbard environmental protection act, would like to point out that a potential handling fee for (research related) permits, exemptions, etc. will add strain on limited research funds and will in general send a negative signal to the research community. SSF regards this detrimental in the light of the Governments strategy to further promote Svalbard as an attractive research platform for Norwegian and international polar sciences (St.meld.nr.22) and Norway’s particular responsibility to develop knowledge of the polar areas (St.meld.nr.22).

Kind regards,


Karin Refsnes