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Miljøgebyr for reisende til Svalbard – Høringsuttalelse fra WWF

WWF welcomes the authorities' efforts to improve the management of Svalbard's natural and cultural values through the Svalbard miljøfond. WWF is positive to a fee payable by visitors to Svalbard, but does not agree with the limited geographic scope suggested for the fee. Limiting the fee to the terrestrial environment does not reflect the actual and potential impacts on Svalbard's marine environment, and could lead to a one-sided and more complicated collecting system for the fee. The fee is small enough to not pose an economic threshold for travellers, but at the same time paying it does play an important role for the awareness-raising objective of the fee. The potential to steer development and activities with a more differentiated fee should also be further explored. Compensation for fee collection to operators or airlines should be carefully evaluated and the most cost-effective approach chosen.

WWF would like to thank Miljøverndepartementet for taking on this important issue, and we appreciate the opportunity to provide comments.

For a reason not quite clear to us, it seems that WWF has not been involved in the previous consultation rounds. We hope nonetheless that our comments below will be considered.

General comments

In the introduction of the briefing document, it is mentioned that the increase in tourism, outdoor recreation and other traffic poses a challenge to management. The resulting increased need for resources to address this challenge is probably the driving factor for the visitor fee. WWF would like to point out that – as acknowledged in the briefing – it is not only tourists that pose actual and potential impact to Svalbard's environment, but other users as well. Another approach mentioned further down in the introduction is based on the "polluter pays" principle ("miljøpåvirker skal betale"). WWF welcomes this approach, but asks authorities to have a broader view of who the "miljøpåvirker" are and reflect it in their legislation.



When it comes to the activities being funded by the Svalbard miljøfond, it is important that priority must be given to precautionary and proactive measures to address the challenges of human activities in Svalbard's vulnerable environment.

When looking at the development of tourism (3.1., page 7), WWF would like to mention that it is not only the coastal multi-day cruises spreading out their activities but also the day cruise operators exploring the Isfjorden area.

The fee amount

The amount of NOK 150 chosen for the visitor fee by Miljøverndepartementet seems to be reasonable based on the arguments outlined in the document (8.2., pp 14).

However, WWF supports the idea to differentiate the fee in order to use it as a steering mechanism as touched upon in 8.1. Such an approach could be either based on geographic differentiation (in- or outside settlements, marine- or terrestrial environments), or activity (motorized- or non-motorized travel).

By doing that – within reason and feasibility – less damaging activities would be given an incentive and the overall pressure on Svalbard's environment reduced in the long run.

In the briefing document, (cruise) tour companies are expressing their concerns about the costs the fee would add. WWF recognizes those concerns, but is certain that for the overwhelming majority of guests and operators, this fee will not play a decisive role. As a matter of fact, if operators choose to communicate the fee and its purpose adequately, it could become a positive element and underline the value of Svalbard's natural and cultural assets – in line with prominent destinations such as Galapagos, for example. This requires also that the guests receive the environmental certificate while they are on the trip and not afterwards, as this would likely be the case if operators would pay their fees after the season.

Comments on the legislative proposal

§ 1 Objective of the fee (“gebyr og formål”)

WWF supports the proposal to demand a fee from every incoming traveller to support conservation and information efforts through the Svalbard miljøfond. We also agree that the amount of the fee should be high enough to enable sufficient funding for precautionary and reactive protective measures and interpretation, while not being a hinder for visitors to come to the islands.



However, we would like to see that the steering function of such a fee would be reflected more (see further up).

§ 2 Geographic scope (“geografisk avgrensning”)

WWF does not agree that the fee should only be applicable to visitors who actually set foot on Svalbard, but that it should include also those visitors who do not choose to go ashore.

The marine areas around Svalbard are closely connected to and the basis of the majority of the activities going on in the archipelago. Even if the more visible impacts might be on the terrestrial environment, the risk and impacts for the marine environment should more than justify including them in the scope of the fee. The argument in the briefing that the ship-related safety and environmental issues are addressed in a separate working group does not change the need to include the marine areas in the geographic scope.

While we recognize that including Svalbard waters in the geographic scope of the fee might be challenged with regard to the right of “innocent passage”, we feel it is fundamentally wrong to exclude the marine areas.

Especially with regard to the cruise ship industry, it is likely that a focus on “visitors ashore” could

1. lead to underreporting of how many passengers were landed (as mentioned in the briefing document)
2. create confusion of how passengers ashore should be counted (not all passengers of a vessel necessarily go ashore each time or maybe not at all during the whole trip)
3. might tempt some, though probably few, operators, to not land people but just sail along Svalbard’s coast for scenery and wildlife. While this will reduce pressure on the terrestrial environment, those operations will still pose a risk and an impact on the marine environment. As the objective with the fee is a “user / polluter pays” approach, the guests of these operators should contribute to the Svalbard miljøfond as well.

§ 3 Target group (“personavgrensning”)

The objective of the fee is to encompass visitors (“tilreisende”) to Svalbard, but the regulation proposal does include many exemptions which will in practise lead to that only “official” tourists are being charged with the fee. How does this “personavgrensning” deal with, f.e. crew of cruise ships, some of which go ashore several times during the season, but at the same time are there on a work-related trip. Maybe a repeat-visit permit could be considered for such and other borderline cases?



The fee should obviously also apply to all official visits conducted by Norwegian authorities and their guests to Svalbard.

§ 4 Payment (“betaling”)

WWF, like all stakeholders, would like to see an uncomplicated system for fee recovery with low administrative costs – whether those occur to the secretariat or fee collectors.

Cruise operators or their agents should be required to pay the fee where applicable for their crew and passengers prior to or during their visit to Svalbard. This will underline the importance of the fee and will give the operators the opportunity to hand out the environmental passes to their guests while on Svalbard. Overpaid fees could be refunded or credited for the next year. It is likely that the ship agents will play a strong role in managing the fee and passes, which will make things presumably easier to handle for all parties.

WWF welcomes the efforts of the Miljøverndepartementet to increase the acceptance of the fee through compensation for the collectors. We expect, however, that if this compensation is granted that a cost effective solution will be found and not too many collectors selected. A percentage-based approach could for example include a maximum compensation or a decreasing percentage structure as the costs per unit decrease with the volume of fees handled.

§ 5 Exemption (“dispensasjon”)

This precautionary back door should be locked very carefully and only used in real “emergencies”.

§ 9 Commencement and changes (“inkrafttredelse og endring”)

WWF agrees with Miljøverndepartementet that due to the ongoing communication with the affected parties no transition period is required.

Concluding, we would like to say that the establishment of the Svalbard miljøfond is an exciting and important step towards making Svalbard a showcase in arctic conservation and tourism management, and we hope that the Norwegian authorities and stakeholders embrace this opportunity with vision and ambition.

We look forward to follow the progress in this work and are happy to answer any questions that you might have.

With kind regards,

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Director


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