

Working as a Norwegian  
**environmental  
umbrella  
organization**

– Experiences of The Norwegian  
Biodiversity Network SABIMA

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**SABIMA**  
*SAMARBEIDSRÅDET FOR  
BIOLOGISK MANGFOLD*

[www.sabima.no](http://www.sabima.no)

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## Summary

SABIMA (Samarbeidsrådet for biologisk mangfold), The Norwegian Biodiversity Network, is a democratic umbrella organisation (NGO) formed in 1996. SABIMA is a democratic umbrella organization, where each member society has an equal right to decide and take part in decisions made. Today SABIMA has 10 member societies, each specializing in a biological field, with a total of 18,500 members. They consist of botanists, entomologists, limnologists, ornithologists, zoologists, marine scientists, toxicologists and other biology specialist groups. Our member societies are described in appendix 3.

Our member societies cover the entire spectrum of plant and animal life, as well as habitat types, and conduct extensive survey work. The members include experts and most skilled amateur biologists in the respective fields in Norway. The oldest society linked to SABIMA has been conducting surveys of plants and animals for more than 100 years, and existed long before concepts such as nature conservation and biodiversity were coined. Much of the knowledge about plants and animals in Norway is based on work done by the societies linked to SABIMA and their members.

*SABIMAs vision is: **Secured biodiversity for the future. This requires viable populations of all naturally occurring species and with genetic variation and habitats which are safeguarded.***

SABIMA plays an important role in setting the agenda for biodiversity in the political life, and for management. The organization has built up a good name and reputation over the past 14 years, and collaborates well with many partners in the environmental field in Norway, as well as in agriculture, industry and political parties.

To illustrate how we function in our everyday practice as the secretariat of an umbrella organisation with a clear function on the behalf of our member societies, this report also includes more general information about SABIMAs working methods. In this part of the report we have also included some examples of cases we have worked for, both success stories and challenges.

## Introduction

This document is written as a contribution to the collaboration between EU/EEA countries, with a particular link to the 'EEA and Norway Grants' which support sustainable development and civil society in new EU member states. In this context, the development of this document is financially supported by the Norwegian Ministry of Environment.

The main aim of the document is to describe the experiences of working as an umbrella organization in the environmental field in Norway, and hopefully provide transferrable 'lessons learnt' to NGOs in other countries.

Norwegian environmental organizations have extensive experience with both short- and long-term alliances, including formal umbrella organizations. Such work has its challenges, but there are also many positive experiences to show for it. SABIMA possesses much knowledge about the factors that have led to success, but also the more challenging constellations.

SABIMA has on a few occasions tried to convey our experiences to environmental organizations and 'biological' societies in other countries, hoping to motivate the forming of alliances along the lines of the SABIMA network in Norway. Many countries have very many and small organizations working on environmental and biological issues, and these have often little impact. Merger and alliance efforts, particularly through more permanent umbrellas, could in our view increase impact and save resources.

In order to better facilitate the transfer of our knowledge and experience, we have felt a need for a thorough documentation of SABIMA and our experiences. Such documentation could also have value for other sectors in Norway.

We wish to thank the Norwegian Ministry of Environment for supporting the development of this document.

## History

SABIMA (Samarbeidsrådet for biologisk mangfold), The Norwegian Biodiversity Network, is a democratic umbrella organisation (NGO) formed 7 May 1996. SABIMA was formed by like-minded NGOs, and consists of 10 member societies with a total of 18,500 members. The member societies consists of botanists, entomologists, limnologists, ornithologists, zoologists, marine scientists, toxicologists and some other biology specialist groups. The main driving force in establishing SABIMA was to acquire more influence on decision-making processes regarding nature and biodiversity, based on the idea that unity makes strong. To begin with, a key idea was to respond jointly to public inquiries ('hearings'). Furthermore, an idea was that the network as a whole would provide help to especially the smaller societies to make them stronger and assist them in making their contribution to the Norwegian society more meaningful than they could manage on their own. The purpose and activities have to a large extent evolved with time.

Key people in some of the organizations realized a gap in the 'flora' of environmental NGOs in Norway. No one covered purely the field of biodiversity, and they saw that SABIMA could fill this gap. The idea was supported by several politicians and civil servants, as they also realized that the increased focus on biodiversity nationwide, and internationally, needed a stronger response. This increased focus was partly a result of the Convention on Biological Diversity (CBD) from 1992.

Personal relations were to some extent important in the formation process. At least some of the societies had already good contact and worked together within certain fields before the creation,

and many key players easily saw the positive sides of a joint venture and how it would increase the benefits for everyone.

An important part during the very first phase of SABIMA was to secure funding. Extensive efforts were made towards convince the Ministry of Environment (MoE) and politicians, which eventually lead to SABIMA being funded by MoE the over the national budget. People in key positions who understood the potential of this umbrella provided vital support. This gave a crucial safety for the organization, and created the space SABIMA needed to develop and find its place in society. It turned out to be of good help that the Norwegian Ornithological Society already was funded over the national budget and knew their way around.

SABIMA was run by volunteers for the first three years, on a rotation basis between the member societies. In 1999 SABIMA employed its first staff, and activity increased rapidly. During the winter of 2000-2001, SABIMA made its first big impact on the political agenda by fronting a clear-cut, fact-based biodiversity case in the newspapers at the start of the year. SABIMA won the argument and received a lot of goodwill from key politicians, civil servants and people in the forestry industry.

SABIMA agreed in 2000 on a robust and clear platform that has remained unchanged since (see box page 6). It is a short but important framework for SABIMA's actions, carefully avoiding stepping any of the member societies on their toes. Having a good 'sensor' for the needs and interests of member societies was important from day one.

## Organization

SABIMA is a democratic umbrella organization, where each member society has an equal right to decide and take part in decisions made.

### Formal bodies

The **annual meeting** is the governing body of SABIMA. It decides the main objectives and the strategic plan of the organization, as well as the budget and by-law issues. Each member organisation also has a member of the **Council**, which meets between the annual meetings to agree on principal issues and other issues as specified by SABIMA's by-laws. At the annual meeting, two representatives for the **Executive Committee** are elected along with substitute representatives as well as the council chairperson and vice chairperson.

### SABIMA's by-laws

SABIMAs by-laws are found in appendix 4 and give a deeper insight into the formalities.

### Secretariat

At present (2010), SABIMA has a secretariat consisting of 3 biology/policy staff, 2 mapping coordinators, 1 forest certification coordinator (part-time), 1 education officer and 1 administrative staff (part-time). The number of staff has increased gradually as the organization has evolved over the years. The secretariat shares offices in downtown Oslo with WWF-Norway, with short distance to the Parliament, ministries and other government offices, as well as trade organisations for agriculture, forestry, industry and many other civil society organisations. It also gives the SABIMA secretariat good opportunities to stay in contact with people in SABIMA's member societies. Several of the member societies also have hired staff, which are regularly in contact with the secretariat and vice versa.

The two **mapping coordinators** are employed in close collaboration with the relevant member societies. One mapping coordinator works for **botany and mycology** (together with The Norwegian Botanical Society and Agariplantus Norvegicus ('The Fungi and Useful Plants Federation')) and the

other for **zoology** (together with The Norwegian Entomological Society and The Norwegian Zoological Society). The purpose of the mapping coordinators are to stimulate, educate and coordinate the hundreds of amateur and hobby biologists who act out their hobbies by collecting and mapping plants and animals in the Norwegian nature. A key focus of the mapping coordinators is to encourage amateurs to enter their data into the national [Internet database for species observations](#), where more than 4.6 million observations have been entered in the course of only 2.5 years. By this, the volunteer efforts become very useful in monitoring and as a knowledge base for land management in Norway. The mapping coordinators facilitate this through seminars, guidance, small grants, subject matter support and personal follow-up of field biologists.

A tremendous effort is done on a daily basis by each member society – both by volunteers and employees, while most of SABIMA's work as an umbrella is carried out by the secretariat staff. The societies excel at subject matter knowledge of each of their species group or habitat type, as well as mapping, membership work and communication through their magazines. The role of SABIMA is to link this scientific and field-based knowledge together and make this relevant for the wider society, especially the political arena (notably legislation and financing) and the land management of directorates (of all sectors), county governors, municipalities as well as industry, agriculture and business. While the societies typically focus on their fields of expertise, the SABIMA secretariat has developed expertise in political strategy and processes, as well as media. An essential prerequisite is trust between the societies and the SABIMA secretariat and making each other better, as well as avoiding unnecessary overlap and stepping on each others' turfs. Sensitivity and instinct may often be as important as formal procedures.

As SABIMA is a small organisation with few staff, hiring skilled staff that fits with and supplement the existing team at any given time is very important. A balance between knowledge and influence is good as well as ability to be team-players, and we have avoided relying on big solo-players. An asset to SABIMA's work has been people that can think smart and device clever strategies.

### **SABIMA's platform and mandate**

In 2000, the member societies of SABIMA agreed on a robust and clear platform that has remained unchanged since. It is a short but important framework for SABIMA's actions. In addition, the annual meeting devices strategies every year, but the below platform has provided very useful guidelines for our work and how the societies wish SABIMA to operate.

#### **SABIMA's platform and mandate**

##### Outreach:

SABIMA is to be a common voice for member societies in relation to authority and political environments.

##### **1 Driving force**

SABIMA shall be a driving force in relation to central authority and political environments.

##### **2 Critic**

SABIMA shall on a professional and objective basis be an active critic of the various players in the land and wildlife management.

##### **3 Premise Provider**

SABIMA shall be important in setting the agenda towards the efforts for the conservation and sustainable management of biodiversity.

#### **4 Knowledge Developer**

SABIMA shall be an important player in efforts to build up knowledge about biodiversity.

##### Internally:

SABIMA shall be an umbrella organization that works to strengthen and coordinate the member societies operation and academic activities.

#### **1 Coordination**

SABIMA will support and coordinate the member societies' work on mapping projects, journals and other academic work.

#### **2 Expertise**

SABIMA will work actively to increase the member societies' professional and organizational skills.

#### **3 Economy**

SABIMA will work actively to increase the operational support to member societies and its own secretariat.

#### **4 Activity**

SABIMA should not compete with member societies on activities or grants, but contribute to increased activity in the member societies.

## **Financing**

SABIMA does not charge its member societies any 'membership fee'. This is a very conscious policy, as the societies are in general under-resourced, and it is rather the intention that funds should flow in the direction *from* SABIMA *towards* the societies. This has indeed in fact also been achieved, in addition to securing increasing funding to the work of the secretariat. Joint efforts by the member societies and the SABIMA secretariat have also resulted in increased core funding for the member societies.

Maintaining a high level of activity, while still avoiding 'membership fees', requires good and long-term fundraising work towards potential sources. For a number of years, there has been a budget line for SABIMA on the Ministry of Environment budget as 'core funding', as there is for most large, national democratic environmental NGOs – as well as a large number of NGOs in other sectors. This represents a very important basis for these organisations, and it is fair to say that the Norwegian NGO sector privileged. In general, civil society organisations are regarded as key players in policy formation and many other functions in the Norwegian society.

In addition to the core funding, SABIMA has been able to secure substantial project funding. Care has always been taken to pursue and accept funding to projects SABIMA itself wishes to carry out. SABIMA has consistently avoided funding that resemble 'consultancy', or project funding in directions that do not fit with SABIMA's strategic plan.

The two mapping coordinators have previously been funded through the National program for mapping and monitoring of biodiversity, but are now funded through a special grant from the Directorate for Nature Management. Visible results in the form of hundreds of thousands of species records motivate the authorities to support the mapping efforts of our network.

Essential to securing and retaining funds is the reputation for effectiveness and value for money SABIMA has established over the years in the Ministry of Environment and the Directorate for Nature Management. Keeping this reputation requires constant and continued efforts. While the financial

situation of SABIMA at present is quite safe, it was not like that before and nothing is granted in the long-term.

## Biodiversity challenges in Norway and modi of work

Key biodiversity challenges in Norway are:

- 20 % of species red-listed
- Deterioration, fragmentation and loss of habitats
- Planning and municipalities' responsibilities
- Forestry (loss of primary forests and creation of plantations)
- Alien species, especially directly or indirectly from horticulture and forestry
- Impact of renewable energy on Nature (bio, hydro, wind)
- Small budget and lack of influence of environment sector

Working for change in this situation, SABIMA's primary tool has not been a high media and public profile. Our main focus has been *results* in particular cases or political processes, rather than attention in newspapers – which sometimes even can be counterproductive. It can be very effective to have others carry 'out' messages for us, and politicians often appreciate taking the credit for achievements. When this happens, the issue is often moved higher up on the agenda. SABIMA also commonly feed facts to journalists, who then put the final touch on the case before it's released as editorial news stories rather than one-sided 'letter to the editor' from SABIMA.

Of course, to achieve change, massive media attention can also be effective, and is often necessary. SABIMA has in some cases also used this instrument, but it requires a lot of resources to be successful. It is often also effective that different organisations use different instruments, and SABIMA has in many cases benefited from media attention given to others – allowing SABIMA to play a different role behind the scenes. Useful information obtained by SABIMA may be given to other players, to make their media work better. Quite commonly, a combination of or compromise between the different approaches may be used to get the best results.

SABIMA cooperates with other environmental NGOs on a regular basis when it serves both the case and both parties, which in fact is quite often. How cooperation works may vary from case to case, but always requires mutual benefits and trust. Also various non-formal networking is a valuable tool, and SABIMA maintains good relations with key people in various scientific institutions and other organisations with expertise. Such resources should be used preciously, only asking when absolutely necessary and only about issues they know really well. This way, people do not feel overused and will be happy to assist again. There are many people 'out there' who wish SABIMA to succeed in preserving biodiversity, and wanting to contribute they often take the initiative by providing ideas and information about opportunities, as well as suggesting way forwards. However, it is important to let them contribute as much as they are capable of, especially when relating to volunteers. Others may require confidentiality when discussing issues with us, and trust is essential in such situations.

Being a network of biologist's societies, SABIMA will always strongly emphasize facts and science in any issue we get involved in. It is usually necessary to make some simplifications and adaptations, but always within scientifically defendable limits. This is important not least to our member societies.

To better utilise and channel all the knowledge within our member societies, SABIMA regularly offer seminars and training courses. Many of the societies are small, and the most effective way for SABIMA's secretariat to utilise all the knowledge that is distributed among members is often direct contact with individual resourced individuals. Seminars targeted at lifting such members' competence on politics, law, management and media is a significant help – both to empower the

members to act on their own, and to make them supply the SABIMA secretariat with even higher quality information and good, concrete biodiversity cases adapted to the political scene.

## Key experiences and some cases

Both the member societies and many individual members probably had not felt as much 'at home' in other Norwegian environmental NGOs as they do in SABIMA. Of course, many field biologists and other kinds of members of the biological societies are also members of organisations such as Friends of The Earth Norway and WWF-Norway, but quite a few are not – and many field biologists are happy with the niche that SABIMA has filled. They feel that their voice is spoken in a matter-of-factly way regarding the situation of biodiversity, and that the focus is on fact-based arguments and solution-oriented. Some scientific/academic members feel better when they could bring forward only their scientific arguments, and have SABIMA adapt and use them in a political setting.

SABIMA's main work and impact is based on the purpose of spreading fact-based knowledge about biodiversity where decisions are made; from the local to the national arena. There are continuously big challenges to work on in the field of biodiversity, and SABIMA aims at making a difference in important cases. We take part in political lobby, respond to public enquiries, participate in working groups at ministerial or directorate level. Key focal entry points are:

- Holes in legislation
- Lack of knowledge
- Lack of awareness, focus and political leadership
- Information and awareness rising

Being a rather small NGO, with expertise in a fairly clearly defined field of the 'environmentalist' agenda, SABIMA has always been careful to select our agenda according to *where we can make a difference*. Many issues are 'occupied' by several other environmental NGOs, and some issues are politically premature and unrealistic to change within our resources. SABIMA often try to ride on ongoing processes, making them move further or wider than people originally might have thought, or sometimes simply making sure that promises actually are delivered upon. Utilising existing opportunities is normally far less resource demanding than creating new ones.

SABIMA has also tried to gain a reputation as a 'stayer', in the sense that we commit properly to apply sufficient resources and follow up until a decision has been made – be that favourable or unfavourable for biodiversity. In the case of unfavourable decisions, SABIMA might of course try to appeal or pursue the case otherwise, but the main enemy of progress is more often stalling and indecisiveness rather than unfavourable decision. It is quite common both for ministries, local authorities, business or forestry to stall and avoid responding properly, hoping that our attention will be diverted and the problems somehow will expire.

As mentioned above, SABIMA often operates behind the scenes or under the radar, both to save resources and because it frequently is the most productive way to evoke change.

### The 'forest massacre' in 2000

One of the first big cases SABIMA was involved in was the disclosure of non-compliance with forestry certification standards by one particular forestry company. This was made public in the media in early 2000, and in the debate that followed SABIMA won the argument, and received a lot of goodwill from the right people both among politicians, civil servants and in fact even foresters. The case was good in terms of setting the records straight based on well supported and assembled facts.

## **The critically endangered butterfly The Chequered Blue**

Conservation of the now critically endangered butterfly Chequered Blue *Scolitantides orion* has turned out to be a very good test case in Norway. The species has declined dramatically in Norway, and now only occur on two sites in Norway – both places conflicting with local development plans. After a long fight, involving 'everyone' from landowners, NGOs, research institutes, local government, regional government, national government, the minister of environment and indeed the media, the two development plans are on hold for the time being. The fight is to some extent still on-going, but there is no doubt that this case has altered mentality and perception of biodiversity and land management. We call it 'the butterfly that changed Norway'. Never before had an insect stopped large development plans. SABIMA argued that if one meant business about halting loss of biodiversity, what would count more than a species only occurring at two sites? The case is thoroughly described in appendix 5.

It is impossible for SABIMA to get involved in all sorts of local development plans that threatens biodiversity, but we select a few cases to point out questions of principle. We have also intervened in some other cases, but few have been so clear-cut and shown the principles so well as the chequered blue case. The publicity around this case probably also had positive influence on the development of the new Biodiversity Act (see page 11).

## **The Norwegian Biodiversity Information Centre (Artsdatabanken)**

A knowledge-based management and conservation of biodiversity is a cornerstone of Norwegian policy, and requires objective knowledge about the distribution, quantity and condition of species and habitats. Such information is often debated and challenged, especially by sectors that are requested to change their practices as a consequence of increased knowledge about their impact. Hence, SABIMA lobbied for several years on the Norwegian government to follow the lead of Sweden and establish a 'Species Databank'. This finally happened in 2005, and the Norwegian Biodiversity Information Centre (NBIC) has played an important role in creating a more unprejudiced debate on especially redlisted and blacklisted species in Norway.

NBIC is a national source of information on biodiversity. Its main function is to supply the public with updated and accessible information on Norwegian species and ecosystems, and in only a few years major progress has been made on creating easily accessible and invaluable Internet databases with large quantities of georeferenced biodiversity data, as well as databases for species names, habitat types, blacklisted species and redlisting background data.

NBIC is also making an effort to increase the focus on biodiversity and raise public awareness. The objective is to provide the public debate with up-to-date, correct information. NBIC carefully maintains a neutral and independent approach to stand forth as an institution with a high level of integrity. More information in English: <http://www.biodiversity.no>

## **Mapping and monitoring: 'Species Observations' (Artsobservasjoner)**

The Norwegian Biodiversity Information Centre has in close collaboration with SABIMA's member societies and SABIMA adapted a Swedish system into a Norwegian Internet database called 'Species Observations'. This is a public service for the reporting of georeferenced findings of species, both fungi, plants and animals. It is independent in the sense that it is the reporter himself who determines what is reported and owns the reported discoveries of species after it has been entered into the database.

The reported species sightings can be freely used by everyone, the public, researchers, organizations and governments. Observations of sensitive species are restricted to the reporter, responsible people in organizations and Biodiversity Information. All findings will be published first and quality assured

afterwards by managers in their respective societies. Many observations are corrected by other users through direct comments to the person who has reported.

SABIMAs mapping coordinators (see above) take part in quality assurance of the data in 'Species Observations', as well as user support, the development of updated user interface and functions, and by stimulating field biologists to use the services.

More than 4.6 million observations have been entered in the course of only 2.5 years, following a similar pattern to Sweden whose database of the same kind has collected 18 million records in 9 years. By this, volunteer efforts become very useful in monitoring and as a knowledge base for land management in Norway.

The member societies of SABIMA have been conducting surveys of plants and animals for decades, some for more than 100 years. Much of the knowledge about plants and animals in Norway is based on work done by the societies and their members, through numerous projects and individual efforts. The 'Species Observations' builds on this tradition, and takes the information to a new level by making it available at everyone's fingertips.

### **The 'Species Project'**

It is assumed that around 60,000 species may be found in Norway. So far only 40,000 of them are actually found, and basic knowledge is imperfect or poor even for most of those. SABIMA lobbied for many years to establish a 'species project', again following Swedish lead and build on major achievements in our neighbouring country. This was established in 2009, aiming at strengthening scientific knowledge of species and fill knowledge gaps. The species project will also contribute to strengthen taxonomic competence at Norwegian Natural History Museums and other relevant institutions. The species project is run by The Norwegian Biodiversity Information Centre, and maintains a close relation to its Swedish counterpart.

### **New Biodiversity Act of 2009 (Naturmangfoldloven)**

The Nature Diversity Act signals a new era in Norwegian nature management, even though it does contain imperfections and compromises. When the natural environment is threatened, the authorities will have a duty to respond with appropriate measures. The Act provides rules for the sustainable use and protection of the natural environment. This means new tools for safeguarding nature, not only within protected areas but also habitats and species in general.

SABIMA was an active and important support player in the process of developing the Act and having it approved by the Parliament. The Act is still very young, and its importance in practice still remains to be fully established. SABIMA works actively to make it relevant in concrete cases, trying to ensure that the Act's intention is implemented in practice.

### **EU's Water Framework Directive**

The EU Water Framework Directive was decided 'EEA relevant', meaning that it falls under the agreement between EU and Norway and has to be implemented here even though Norway is not an EU member. The road to domestic implementation has been long and bumpy, and in 2007 SABIMA together with other environmental NGOs withdrew from the national reference group because we found the process inadequate in many ways.

We have since focused on a few fundamentally important aspects of the implementation of the Directive in Norway. We worked closely with the Energy and Environment Committee in the Parliament on the conditions for formally adopting the directive. The conditions did, among other

things, state that the directive should have implications for the revision of the conditions for hydropower licenses. SABIMA has also highlighted the importance of resources to the work and public participation.

### The 'Living Forest' collaboration

Since 1998, SABIMA has taken part in the establishment and further development and usage of the Norwegian 'Living Forest' forestry certification standards (PEFC). The first revision was, after unfortunate delays, completed in 2006, leading to the formation of the 'Living Forest Council', consisting of five forestry industry organisations, two environmental NGOs (SABIMA and WWF-Norway), two outdoor recreation NGOs and one labour organisation. SABIMA assumed the role of secretariat for the process. SABIMA's participation in this collaboration, although being criticised for legitimizing harmful forestry operations, has had significant impact on forestry practices.

However, after long and intense negotiations over the use of alien tree species, SABIMA together with WWF and the outdoor recreation NGOs presented in June 2010 an ultimatum (containing, however, major concessions to the forestry) to the forest owner's association. The ultimatum was not accepted, halting the process. SABIMA has been willing to accept compromises and be part of a process we far from fully control, in order to have influence on the forestry practices. Still, it was necessary to draw a line when progress was unacceptably slow in disfavour of forest biodiversity. Nearly half of Norwegian red-listed species live in forests, and forestry is a major threat to biodiversity in Norway. The breakdown in negotiations continues to put pressure on the Norwegian forestry industry and agriculture authorities.

## Minefields

We anticipate that some problems might be instant killers of successfully forming and running an umbrella NGO such as SABIMA. How SABIMA has avoided such minefields is described above, so three key challenges are only briefly summed up here:

- **Lack of 'business idea':** If there is no 'available room' to occupy, it will be difficult to obtain endorsement from supporters or even member organisations. There need to be an agreement between the members on what role an umbrella should have, that does not overlap significantly with the members or preferably other existing NGOs or other bodies.
- **Disagreement on profile:** If the umbrella tries to have a high media profile, but consists of strong member organizations that wish to play this role themselves, the conflicts potential is obvious. Conversely, if member organisations are of more scientific type, the umbrella needs to stick to playing a media and/or political role.
- **Fight over resources:** The umbrella should avoid utilising sources of funding that the member organisations traditionally have used, and rather try to fit in elsewhere, and if possible rather generate or guide members to new funding opportunities. SABIMA has had one case of a member society pulling out because they had expected SABIMA to deliver more funding, and probably partly also because they preferred to play the media and political role themselves (cf. previous bullet point).

## Ways to success

Establishing an umbrella organisation requires particular attention to communication and sensitivity towards profiles, strategies and ideas in the existing organisations. It is also important to build trust and understanding between the secretariat (or board, if that is the starting point) and the member societies. It is critical to not step on each other or compete over resources and/or attention, but rather focus on making each other better.

In the previous chapters, we have described some of the ways SABIMA works and concepts we have found to be successful. Most of the points briefly summed up below build on these chapters:

- **Fill a gap:** Establish the umbrella organisation in an area which is not occupied from before.
- **Avoid internal competition:** Choose work areas and public profile so that they don't overlap with member societies. Avoid taking the niche of members, and if possible other similar organisations. Build trust and understanding, based on frequent and clear communication.
- **Make each other better:** The umbrella should work actively to assist its member societies to develop in size and strength. This would create a win-win situation, and prove the value of having established the umbrella.
- **Secure funding and be clear about the sharing of it:** Make sure the organisation is calibrated to the available resources, and try to secure long-term funds. Make sure expectations from member organisations are adjusted to reality, but direction and efforts of the umbrella must of course also be adjusted to requirements from the members.
- **Choose issues where one can make a difference:** Avoid issues where many others already are involved, or where it is unrealistic to make an impact.
- **Be politically relevant and practicable:** Have a realistic approach of current interest and relevance to on-going processes, and suggest ways forward that are in fact possible to implement.
- **Build good relations and trust:** When discussing issues with politicians and civil servants in confidence, *never* break that trust. Also make sure that information you give can be trusted, so that people who use it don't get into trouble.
- **Help others do and achieve – create space for politicians:** Consider whether an issue at hand would profit more from allowing others to take credit for it than yourself getting media attention.
- **Be clear on the chosen profile:** In SABIMA's case it has turned out successful to operate behind the scenes and below the radar, while still using the media when appropriate and effective. For other organisations, depending on the conditions, a high media profile might be the best way forward.
- **Collaboration with other NGOs (niche differentiation):** Sharing ideas and strategies with colleagues is nearly always valuable. Don't be afraid of collaboration, even when one's own profile may become somewhat diluted. Most effective and useful is such collaboration, however, when the partners have little overlap and can supplement each other.

# Appendices

## **1. The role of environmental NGOs in the Norwegian society**

Civil society in general has a high standing in Norway, and is given space both by government and in media. NGOs are active in all sectors of policy making in Norway. On the environmental side, NGOs take part in general lobby efforts to increase both the quality (especially representativeness) and quantity (especially forests) of protected areas. Biologist's societies, notably the ones under the umbrella of SABIMA (ornithologists, botanists, entomologists), play a key role in mapping biodiversity. This is, among other management tasks, a substantial input to the knowledge base for land use management and for selecting area for protection. In some areas, NGOs have also taken part in management schemes in valuable cultural landscape habitats. NGO activities can be funded by both private and public money.

## 2. Norwegian nature management system

The main responsibility for management and protection of biodiversity and nature is held by the Ministry of the Environment (MoE). A key tool for MoE is the new (2009) Nature Diversity Act, which regulates most of biodiversity protection and exploitation. Under MoE lie the following government services:

- The Directorate for Nature Management (DN) (250 employees) is the national governmental body for preserving Norway's natural environment, playing both an advisory and executive role.
- The Climate and Pollution Agency (KLIF) (325 employees) implement government policy on pollution, acting as a guide, guardian and driving force for a better environment. Its most important fields of work include climate change, chemicals, water and the marine environment, waste management, air quality and noise.
- The Directorate for Cultural Heritage in Norway (Riksantikvaren) ensures the protection and equal treatment of cultural heritage monuments.
- The Norwegian Polar Institute (NP) is Norway's central institution for research, environmental monitoring and mapping of the polar regions.
- The Norwegian Mapping Authority (NMA) is the national provider and administrator of geodesy, geographical and cadastre information covering Norwegian land, coastal and territorial waters. NMA includes The National Land Registry.

In Norway, people meet the public sector in most walks of life. The most important administrative level is the municipality, or local government, of which there are 430. The municipalities are responsible for the basic services of society, and also for most of the area planning and land use. The municipality administration prepares cases for decision by the elected municipality politicians.

The County Governors play an important role and partly answer to and act on behalf of MOE/DN in environment issues. They are the chief regional representative of Norway's national government, and works for the implementation of Parliament and central government decisions. The County Governor explains central policy documents in the local context, being aware of each municipality's ability to provide. Experts from the County Governor's office supervise local activities, advise and instruct – with due respect to the political judgement of the local government. In some cases, however, they may formally object to for example land use plans approved by the municipality, and if the municipality does not comply, the case is forwarded to the ministry for final decision. The County Governor also supervises local decisions regarding health and social care, education, agriculture, emergency planning, local government finances and family matters, answering to other ministries in such cases.

### 3. About SABIMA's member societies



#### **Norwegian Ornithological Society (NOF)**

[Norwegian Ornithological Society](#) (NOF) was founded in 1957 and is a conservation NGO with an emphasis on birds and bird conservation. An important part of NOF's work is to be the link between birdwatchers across the country. Gradually, the conservation of bird species and their habitats has become more important to the society's work. NOF attempts to influence management and protection of bird populations through documentation.

NOF has approximately 9500 members and seven employees. The secretariat is located in Trondheim with six of the staff. The seventh has offices in Bergen. NOF also employs more than hundred project workers each year. There are branches in all counties except one and 51 local groups. Members can participate in numerous activities, such as garden bird counts, breeding bird inventories and other registration work.

It is in the regional branches and local groups most of the activity takes place, with meetings, birdwatching trips and local projects. Most regional branches publish their own journals.

NOF publishes two member journals, 'Vår Fuglefauna' ('Our Bird Fauna') and 'Fuglevennen' ('The Bird Friend'). Vår Fuglefauna has four issues a year, containing 48 pages of interesting and educational articles from home and abroad. Fuglevennen is published twice a year, and includes easier accessible information about birds. Fuglevennen is the NOF's recruitment journal. In addition, NOF publishes the scientific journal *Ornis Norvegica* twice a year.

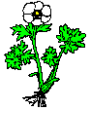
NOF is a partner of BirdLife International, and through this takes part in ensuring important habitats for birds throughout the world; both by cooperation and own projects.



#### **Agariplantus Norvegicus ('The Norwegian Fungi and Useful Plants Federation')**

[Agariplantus Norvegicus](#) (In Norwegian called 'The Norwegian Fungi and Useful Plants Federation') is an umbrella organization for Norway's different fungal societies and 'Useful Plants' societies. It was formed in 2005 as a merger between the Norwegian Fungus Society and 'The Useful Plants' Society', and currently comprises 29 member societies in 16 counties with a total of approximately 3,500 members.

The society works to increase the use of and knowledge about fungi and 'useful' plants among the members and the community, and to ensure that information about their culinary and medicinal values are made known. They facilitate the collection of mushrooms and edible plants to be a source of recreation and value. The society also takes part in biodiversity conservation efforts, and provides information on species' interactions with other organisms and their beneficial and harmful effects. They work for both public and scientific interest in the fields of fungi and edible plants, and reaches out to government, national organizations and agencies and more.



### Norwegian Botanical Society

The [Norwegian Botanical Society](#) is the society for plant enthusiasts in Norway. It comprises both formally educated and autodidact botanists and others interested in Norwegian botany and nature. The society was founded in 1935 and has approximately 1500 members across the country. It is organized into twelve regional divisions, covering areas of varying size. The society publishes the magazine 'Blyttia'. Many of the regional divisions also have their own periodicals. Most of the activities take place locally, arranging trips mainly during the summer season and meetings with lectures in the winter. In addition, several local societies organize flora mapping projects.



### Norwegian Biologist Society (BIO)

The [Norwegian Biologist Society](#) (BIO) was founded in 1981, and has currently about 1000 members. The society organizes university-educated biologists in all occupational categories. BIO is also open to biology students. Others with an interest in biology may be supporting members. BIO publishes the journal 'Biolog' ('Biologist'). BIOS objectives are:

- Strengthen the academic community and contact between Norwegian biologists
- Strengthen biologists' interests in the labour market
- Strengthen the biology subject in school curriculums
- Put biological knowledge into use at all levels of community planning
- Establish contact with foreign biologists and biologist organizations
- Run the Internet/blog-service: 'Ask a biologist'



### Norwegian Entomological Society (NEF)

The [Norwegian Entomological Society](#) (NEF) was formed in 1904 by ten eager entomologists from different parts of the country. The Society's purpose is to promote interest in and study of entomology in Norway and to facilitate contact between people. Anyone with an interest in insects and spiders is welcome as a member of the society.

NEF has about 600 members scattered across the country. The members include both professional and amateur entomologist. The society publishes several magazines and other printed matter. The most important is the membership magazine 'Insekt-Nytt' ('News on Insects') published four times a year, as well as the more academically oriented *Norwegian Journal of Entomology* two times a year. NEF organizes trips and member meetings. The activity is particularly high during the summer season, and NEF facilitates lots of mapping of species on a volunteer basis and in organized projects.



### Norwegian Marine Researcher's society

The main purpose of the [Marine Researcher's Society](#) is to organize academic annual meetings and through these help to increase the knowledge of Norwegian marine research and education in the marine field.



### **Norwegian Zoological Society**

The [Norwegian Zoological Society](#) (NZF) was founded in 1946 and is the only NGO in Norway covering all groups of animals, from insects and crustaceans to mammals and birds. The society is open for all individuals interested in zoology – amateurs as well as professional zoologists. The society's main aims are inform the public, as well as the authorities, about wildlife in Norway and to work for the conservation of wild animals and their habitats. NZF has seven local divisions around the country that arrange their own field trips and meetings.

The membership journal '*Fauna*' is published four times a year. Fauna is an important source of information on all groups of wild Norwegian animals. The journal has a popularized profile emphasizing readability for all members as well as scientific quality. All main papers have English summaries.



### **Norwegian Limnology Society (NLF)**

The [Norwegian Limnology Society](#) (NLF) aims at disseminating and increasing knowledge of freshwater biology in Norway. NLF also aims at strengthening the discipline limnology in teaching, research and management, and to increase the authorities' academic foundation to manage water resources in Norway.

### **NSFT Norwegian Society for Pharmacology and Toxicology**

The [Norwegian Society for Pharmacology and Toxicology](#) is a professional society with the aim of promoting development and interest in pharmacology and toxicology in Norway. The society has an established tradition of spring meeting, autumn meeting and winter meeting where key issues in basic and clinical pharmacology, human toxicology and ecotoxicology are addressed.

NSFT has two sections: clinical pharmacology and toxicology. Each has its own activities and contributes to the implementation of the regular meetings. NSFT is also responsible for the registration scheme for toxicologists in Norway, and has created a separate national approval committee.

NSFT is part of an international professional network in pharmacology and toxicology. They are a member of the European Federation of pharmacological companies, EPHAR, and the corresponding federation in toxicology, EUROTOX. They are also members of the international organization IUPHAR, in pharmacology and toxicology in IUTOX.

NSFT has over 500 members of whom 22 are corporations and institutions. NSFT publishes the magazine '*Toksikologen*' ('The toxicologist') which is primarily aimed at members of the Section of Toxicology, while some publications are distributed to all members of the society.

### **Nordic Cultural Landscape Society - Norway**

[Nordic Cultural Landscape Society - Norway](#) is an NGO working for the maintenance, use and development of the cultural landscape with its cultural and natural elements. The society was founded in 1986 and has members from all the Nordic countries.

Their goal is to develop, promote and communicate a holistic view of the cultural landscape as the basis for versatile use, management and development, so that the values of the landscape are conserved. A key element is the dissemination of knowledge about how a modern society is better able to maintain a varied use of the landscape. The society aspires to be a visible and active participant in public debate.

Nordic Cultural Landscape Society has chosen the Nordic perspective based on the need to see the national cultural interests as a larger whole. Since it is a Nordic organization, it receives no form of operational support.

One of the society's most important tasks is to gather Nordic resource people to various seminars / conferences and publish academic publications on relevant topics. The member pocket magazine and journal '*Nordic-in*' is the union's own. In addition, the association publish material in collaboration with relevant professional institutions.

## **4. SABIMA's by-laws**

Adopted 7 May 1996. Revised 8 March 1999, 21 June 1999, 11 April 2000, 6 March 2001, 19 April 2004 and 12 April 2005.

NOTE: This English translation of the by-laws is not officially adopted by the organisation.

### **§ 1 Name**

Name of the organization: The Norwegian Biodiversity Network (SABIMA).

### **§ 2 Vision**

SABIMA's vision is: Biodiversity is secured for the future. This requires viable populations of all naturally occurring species, and that their genetic variation and habitats are safeguarded.

### **§ 3 Purpose**

3.1 SABIMA shall be a common voice for member societies towards government and politics.

3.2 SABIMA shall be an umbrella organization that works to strengthen and coordinate the member societies' operations and activities.

### **§ 4 Organization type**

4.1 SABIMA is an independent umbrella organization of biological societies in Norway, where each member society is responsible for its economy, constitution and organisation.

4.2 SABIMA shall coordinate efforts of the member societies for conservation of biodiversity, thereby increasing the effectiveness of the work.

4.3 SABIMA has no right to instruct the member societies.

4.4 Each organization is free to approach the government on its own initiative in individual cases. In cases where bigger impact can be achieved through common action, joint initiative should be tried. Diverging views and interests in a particular field must not lead to reduced cooperation in areas where agreement can be achieved. In cases where it is appropriate for example because of knowledge or capacity, one of the societies could have a leading role.

### **§ 5 Governance**

#### **5.1 Annual Meeting**

5.1.1 The annual meeting is the organization's top decision-making body.

5.1.2 The annual meeting is held every year by the end of April. Notice and documents shall be sent out no later than four weeks before the annual meeting.

5.1.3 At the annual meeting, each society can meet with two representatives, preferably permanent representative and chairperson, both with voting rights. At the annual meeting the council chairperson and deputy also has a right to vote.

5.1.4 The Annual Meeting deals with the following issues:

- a) Election of meeting chairperson and reporter
- b) Annual Report and Accounts
- c) Proposed work plan and budget

d) Election of council or deputy chairperson every other year, so they are not replaced simultaneously. Both are elected for two year terms and shall not originate from the same society.

e) Election of two executive committee members and 1st and 2nd substitute members. The aim should be that the committee has a broad background, and that no society has more than one representative on the committee. If an organization wishes to withdraw its representative on the committee, it will be replaced by the 1st substitute.

f) Election of the Nominating Committee, consisting of three persons, appointed for two years alternately so that not all are replaced at once.

5.1.5 The annual meeting forms a quorum when 2/3 of the societies are represented. Decisions are made by simple majority. By equal vote, the council chairperson has an extra vote.

5.1.6 Issues to be discussed at the annual meeting must be received by the Secretariat no later than six weeks before the annual meeting.

5.1.7 Proposed resolutions for the annual meeting must be submitted in writing. It can not be promoted or voted on matters not listed on the agenda.

5.1.8 Minutes of the annual meeting are to be sent to the representatives of the Council and member societies centrally. If there are no objections to the minutes within two weeks of broadcasting, this is valid as a working basis.

## **5.2 The Council**

5.2.1 The Council consists of one representative, with a personal deputy, from each society and the council and deputy chairperson. In Council meetings, the council chairperson and deputy chairperson have one vote each, and each society has one vote each. The societies can meet with one additional person beyond their regular representative. In addition, individuals can be summoned in individual cases.

5.2.2 Between annual meetings there will be held at least one council meeting.

5.2.3 Council Meetings are chaired by the council chairperson and shall deal with fundamental issues between annual meetings.

5.2.4 Council meetings shall approve the hiring of SABIMA staff exceeding 6 months.

5.2.5 Council Meeting has a quorum when half of the societies are represented. Decisions are made by simple majority. By equal vote, the council chairperson has casting vote.

5.2.6 Documents should be sent out no later than 14 days before the meetings.

5.2.7 Minutes of Council meetings is to be sent to all representatives of the council. If there are no objections to the minutes within two weeks of publication, the minutes are is valid as a working basis.

## **5.3 The Executive Committee**

5.3.1 The Executive Committee consists of the chairperson, deputy chairperson, two permanent members, two substitute members and the director. The two permanent members and alternate members are elected by the annual meeting among representatives of the Council for a period of

two years but preferably every other year so that one permanent member and one substitute member are replaced every year.

5.3.2 Between Council meetings, the Executive Committee is responsible for practical implementation of decisions and monitoring of ongoing cases.

5.3.3 Documents to the Executive Committee meetings shall be sent out to all council members one week before the meetings.

5.3.4 Minutes of the Executive Committee meetings shall be sent to all council members. If there are no objections to the minutes within two weeks of publication, they are valid as a working basis.

5.3.5 The Executive Committee implements employment of paid personnel, but when hiring of staff for more than 6 months, they must obtain consent from the Council. For externally fully financed commitment, the working group can hire staff for more than 6 months.

#### **5.4 Secretariat**

5.4.1 As long as the economy permits, SABIMA shall have a secretariat with a director. The Secretariat is the secretary for, and thereby responsible for, the implementation of decisions taken by the annual meeting, the council and the Executive Committee.

5.4.2 In the periods during which SABIMA does not have a secretariat with staff, the responsibility is assumed by Executive Committee. The task of being the secretariat for SABIMA can be rotated among those of the societies that have the capacity to do so.

#### **§ 6 Membership**

6.1 Societies dealing with biological diversity on a scientific basis can apply for membership in SABIMA.

6.2 New member societies are approved by the Council.

6.3 The Membership is valid until withdrawal is done in writing.

6.4 The annual meeting may by 2/3 majority decide to exclude societies acting in violation of SABIMA's purposes.

#### **§ 7 Finances**

7.1 SABIMA shall as far as possible be financed externally, including core funding and project funding. These funds will cover the operation of the Secretariat. Beyond this, SABIMA shall, as far as possible, provide funding for projects and other activities by the member societies.

#### **§ 8 Amendments**

8.1 Amendments of these by-laws require 2/3 majority at the annual meeting.

#### **§ 9 Dissolution**

9.1 SABIMA can be dissolved at the annual meeting by 2/3 majority when 2/3 of SABIMA member societies participate in the vote. The organization's funds would then be transferred to an organization with similar purposes as SABIMA.

## 5. The case of the endangered butterfly species chequered blue *Scolitantides orion* in Norway

The chequered blue butterfly was redlisted by IUCN criteria as endangered (EN) in Norway in 2006, and upgraded to critically endangered (CR) in 2010. It used to occur in a fairly large area along the south-eastern coast of Norway, and is historically known from 16-20 sites. Over the past decades, however, it has only been known from two sites very far apart: one in Halden municipality and one in Tvedestrand municipality. The chequered blue also occurs in Sweden and Finland, but only on 2-3 sites in each country after a dramatic decline also there. A different subspecies, which is less blue and looks different, occurs in Southern Europe.

### **Halden**

SABIMA discovered in 2007 that there was an approved local development plan to build houses and other structures in the exact spot for the butterfly in Halden. We made a formal protest to the Minister of Environment, who instantly called for a halt in the development. After about six months, the Minister formally revoked the development plan in Halden.

The case has had extensive media coverage, and there are of course many more details behind and around it. The landowner was disappointed, while many other locals were happy that the area was not developed further. A key person assisting SABIMA locally was Mr. Jan Erik Carlsson, who was given SABIMA's environmental award for 2009 – presented to him by the Norwegian Minister of Environment.

### **Tvedestrand**

In 2008 SABIMA became aware of a local development plan with some 20-25 houses in the butterfly's habitat also in Tvedestrand. The plan, presented by the landowner and supported by the municipality, was already being carefully studied by the County Governor, who's responsibility is to supervise that national policies are being carried out by the local government. The plan in Tvedestrand was violating national regulations saying that construction should not take place closer to the shoreline than 100 meters. SABIMA put forward to the County Governor that the plan also could threaten the existence of this very rare and threatened butterfly, and referred to the action already taken by the Minister in the case of Halden.

The County Governor entered a formal protest to the plan on both these two grounds, which local government (the municipality of Tvedestrand) did not accept. On 10 February 2009, the case was therefore sent 'upwards' to the Minister of Environment. On 19 June 2009, the Ministry (not the Minister himself) came on an on-site inspection in Tvedestrand. Along for the inspection came representatives from the County Governor, the municipality, the landowner and SABIMA.

On 26 August 2009, a clear recommendation came from the Directorate of Nature Management that the Minister should support the County Governors decision. The final and formal decision was taken by the Minister of Environment, Mr Erik Solheim, on 6 October 2009. The minister was very clear that care for the endangered butterfly was important, and emphasised the precautionary principle and the principle of 'good knowledge base' from the brand new Norwegian Biodiversity Act. On these grounds, the local development plan of the landowner was formally revoked by the Minister. The Minister advised that further fieldwork must be carried out and an action plan for the butterfly must be in place before any new and revised local development plans in the area can be considered.

The decision has also had consequences for other less advanced development plans in the area, for example a plan of constructing some 150 holiday cottages by a small group of landowners. These plans have also been put on hold, awaiting further mapping and the action plan.

The case has had massive coverage in local media (and even made fun of in local revues!), and some in national newspapers. In 2009, even the French/German TV company Arté travelled to Norway to tell the story of the chequered blue in Norway.

## KEY PLAYERS

**The County Governor** (Norwegian: 'Fylkesmannen') is the chief regional representative of Norway's national government, and works for the implementation of Parliament and central government decisions. In Norway, people meet the public sector in most walks of life. The most important administrative level is the municipality, or local government. They are responsible for the basic services of society. The County Governor explains central policy documents in the local context, being aware of each municipality's ability to provide. Experts from the County Governor's office supervise local activities, advise and instruct – with due respect to the political judgement of the local government. In so doing, the County Governor acts as a guardian of civic rights. The County Governor may look into local decisions regarding the rights of any individual in the fields of health and social care, education, building and planning, and may change the decision to the benefit of the individual. Other important fields of action are environment protection, agriculture, emergency planning, local government finances and family matters. [www.fylkesmannen.no/hoved.aspx?m=3173](http://www.fylkesmannen.no/hoved.aspx?m=3173)

**The Directorate for Nature Management** (Norwegian: Direktoratet for naturforvaltning, DN) is the national governmental body for preserving Norway's natural environment. The directorate serves as an advisory and executive agency under the Norwegian Ministry of Environment. <http://www.dirnat.no>

**NINA** (The Norwegian Institute for Nature Research) is Norway's leading institution for applied ecological research. NINA is responsible for long-term strategic research and commissioned applied research to facilitate the implementation of international conventions, decision-support systems and management tools, as well as to enhance public awareness and promote conflict resolution. [www.nina.no](http://www.nina.no)

## SABIMA's views

This has been a test case of the actual political will to halt the loss of biodiversity, which is an official objective both in Norway and the EU. One can hardly find a more concrete case of a species close to extinction, where you can take concrete action to *reverse* the situation – or in fact close your eyes and continue enterprises with a high risk of pushing the species over the brink of extinction.

The butterfly is also a symbol of vulnerable habitats, that for too long have been threatened with bit-by-bit land use changes and 'development'. There are of course many species and whole ecosystems under threat. It is constantly argued that just '*this* little development plan' cannot be that important for the well-being of nature. The result is that one area after the other is destroyed by construction or other types of habitat changes. We are already far beyond a sustainable threshold, proven by the fact that 20 % of Norwegian species of plants and animals are on the 'Red list' as threatened by extinction. SABIMA uses the chequered blue butterfly as wake-up call that area management in Norway must change drastically.

It is of course understandable that landowners and construction companies are unhappy when their plans are cancelled, especially when lots of resources have been put into the planning process. Unfortunate situations like this happen when environmental aspects are not sufficiently taken into consideration, and when the whole land use management system is unhealthy. One also simply has

to face the fact that we cannot continue to 'consume' land in the same manner as has been done up till now. Nature is not infinite.

### **Fieldwork and action plan**

The chequered blue butterfly had in fact not been documented from the site in Tvedestrand since 1996, so extensive field work was conducted in 2007 and 2008 carried out on a volunteer basis by people connected to SABIMA. Finding the butterfly was unsuccessful, and it was feared that the species was locally extinct. Nevertheless, SABIMA argued that it *could* still be there – and it could also be an option to reintroduce it to the area. Hence, the areas should still be managed carefully with consideration to the butterfly, SABIMA argued.

In 2008, NINA (Norwegian Institute for Nature Research) was commissioned by the Norwegian authorities to develop an action plan for the chequered blue butterfly. Fieldwork to gain more knowledge was initiated both in Halden and Tvedestrand. The fieldwork was intensified in Tvedestrand and Halden in 2009, and in Tvedestrand one imago specimen was found as well as a few eggs at one site and a single egg at a different site. In 2010, five imago specimens and a little more than 100 eggs were found – spread on a few sites. This is a good development compared with the negative results in 2007 and 2008, but the population in Tvedestrand is obviously at a critically low level. In Halden, the population is significantly stronger, but the chequered blue is only known from one quite small area.

The national action plan is at present (November 2010) being reviewed by the government. The content of this plan has been the responsibility of NINA, and SABIMA has not taken part in its development to avoid mixing of roles.

# SABIMA

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2010