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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

**Standing Committee**

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**Other complaints**

**Possible negative impact on Breiðafjörður  
Nature Reserve's authentic birch woods from  
new road infrastructure  
(Iceland)**

**- REPORT BY THE COMPLAINANT -**

*Document prepared by  
Iceland Nature Conservation Association and Fuglavernd BirdLife Iceland*

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## **FURTHER INFORMATION ABOUT COMPLAINT NO. 2017/06 - POSSIBLE NEGATIVE IMPACT ON BREIÐAFJÖRÐUR NATURE RESERVE'S AUTHENTIC BIRCH WOODS FROM NEW ROAD INFRASTRUCTURE.**

### **THE ORIGINAL COMPLAINT.**

The Icelandic Road Administration (hereafter called IRA) plans to build a new road through Teigsskógur, one of the largest authentic birch woods (*Betula pubescens*) in the North-western peninsula of Iceland and causeways over the mouth of two fjords: Djúpi fjörður & Gufufjörður. The road will be in the nature reserve *Breiðafjörður*, threatening the integrity of the nature reserve.

The initial plans date back to 2004-2005, when IRA planned to rebuild a road through this area. The alternative then was a road over a 336 m high "mountain", Hjallaháls. After the environmental assessment, where many consulting institutions were involved, the National Planning Agency rejected this route (called "leið B" then) on grounds of its very extensive environmental impact. The decision of the National Planning Agency was overturned by the minister of the environment in 2006. This ruling was then directed to the district court by the landowners and some Nature Protection NGOs where the decision of the minister was overturned and the court confirmed the previous decision of the National Planning Agency. IRA appealed to the Supreme Court of Iceland, which confirmed the lower court decision. The NGOs involved were *Fuglavernd BirdLife Iceland* and [\*Iceland Nature Conservation Association\*](#) with a great support from *Landvernd, Icelandic Environment Association*.

After going twice to court and losing the case twice it was clear that IRA had to change their plans. A new environmental assessment was completed in 2016-2017, and a few alternative routes given for this new road, including road tunnel under the 336 m high Hjallaháls (called "leið D2"). But the road through the Teigsskógur wood and on causeways over the fjords is still in! Now it is called "leið Þ-H". In my view, it is practically the same route as suggested before, but has been moved some meters to the left or right at some locations. This seems also to be the opinion of the National Planning Agency which according to the current legislation issues only opinions, not decrees as before. At this moment two lines will be considered, "leið Þ-H" and the road tunnel option.

The road tunnel alternative (at elevation ca 40 m a.s.l) is more expensive than "leið Þ-H". But I have pointed out that a road tunnel at elevation circa 110 m a.s.l. would even be economically more feasible, involving less costs, than "leið Þ-H" when all things are considered. The IRA seems not to listen on that argument. Needless to say, the tunnel alternative has much less environmental impact than "leið Þ-H". That is clear from the environmental impact assessment and not contested by other stakeholders.

There was, and is sadly still, some political pressure to build this road according the "leið Þ-H", through the wood and over the fjords. Even a few representatives at the Icelandic parliament (3-4 from the NW-district) have said that the *only way* is to issue a special law permitting this, despite the EIA. I am not sure that that has been done before here in Iceland.

Among the consulting national institutions that have been asked for opinion on this project during the environmental assessments and considered "leið B" and "leið Þ-H" the worst of the alternatives, are the Marine & Freshwater Research Institute, the Icelandic Institute of Natural History, the Environment Agency of Iceland, the Cultural Heritage Agency of Iceland, and the Icelandic Forest Service.

The area where IRA plans to build "leið Þ-H" along the virgin birch wood and on causeways over the fjords is either protected by Icelandic law in various ways or "needs to be protected", i.e. is on the National Registry of areas of conservation interest. The wood itself is no 303 on the aforementioned Registry. Furthermore, a committee established by the Ministry of the environment concluded in 2006 that this wood (and ca 8 others) should be protected or needed protection. But this has still to be done. Extremely rare and protected plants, such as *Paris quadrifolia*, have been found in this wood. The coast in this area is a part of "*Verndarsvæði Breiðaffarðar*" (= Breiðafjörður bay Nature Reserve)

which is also a designated Important Bird Area (IBA). The two fjords are important for many migrating bird species such as Knot (*Calidris canutus*) and other species such as Whooper Swans (*Cygnus cygnus*) and are known for kelp growth. “Leið Þ-H” is also very close to a White-tailed Eagle nest (*Haliaeetus albicilla*), but this species is strictly protected in Iceland. Nominations of the Breiðafjörður Bay as Ramsar site, as well as UNESCO World Heritage Site are in progress.

The IRA plans involving road construction in the Djúpi fjörður - Gufufjörður area have to be considered in context with both previous and pending road construction in the Breiðafjörður Bay Nature Reserve. There are 13 smaller fjords in the northern part of the Bay. Three of them have already been affected by causeways and one of them (Gilsfjörður) in such a drastic manner that its ecological character was seriously altered. Causeways are pending in further four fjords: Þorskafjörður, Dúpi fjörður, Gufufjörður and Vatnsfjörður. In the south part of the bay there are five main fjords, with a total of three causeways, one of which resulted in changing a large marine area into brackish or mostly fresh waters.

The Breiðafjörður Bay, of which the contested site is an integral part of, is in progress of being nominated as an Emerald network site, according to information provided by the Icelandic Institute of Natural History as this area hosts a large suite of both intertidal habitats and bird species of European conservation concern.

This is likely to breach the AEWf agreement, where Iceland is a joining member, due to high number of migrant bird, including waders and other waterbirds, which use the littoral for feeding and staging. Many arctic waders use the area as stopover site. Hundreds of thousands of seabirds breed in the Breiðafjörður area.

Before IRA can start building this road, the municipality in the area involved, *Reykhólahreppur* ([www.reykholar.is](http://www.reykholar.is)), must change their master plan (“*aðalskipulag*”) which must be accepted by the National Planning Agency. Then the municipality can give a construction permit to the IRA. This may all happen in the next few months so time and quick action matters.

Maps of the area are below. The first figure shows the Breiðafjörður area and the red square is shown in more detail on the second map:



“Leið Þ-H” (along the wood and over the fjords) is the blue line, but the red one is the alternative with a road tunnel (“leið D2”). The current road between the two ends is shown with a thin black line. The white line (under and close to the blue one) is the previous alternative (“leið B”).

Put together: The road as the IRA suggests (the blue line) risks further the integrity of the Breiðafjörður Bay Nature Reserve, as an additional encroachment into a nature area of very high European and international value for birdlife, landscape and important natural woodland. The alternative suggested by the nature protection organisations (the red line with a tunnel under the Hjallaháls heath) saves the fjords and the woodland as well as it seems to be more obvious future road and even more secure in winter.

## THE REPORT FROM THE GOVERNMENT.

The Government was asked for a comment on the complaint and the NPA did send a report on their behalf. The main conclusions in the report from the Government are the following:

*“The NPA’s conclusion is that routes A1, H1, I and P-H will have significant negative impacts on the landscape due to the crossing of fjords, disruption of holistic landscapes and pristine areas and in the case of route P-H, also because of significant and irreversible visual changes on the Teigsskógur woodland.”*

*“To conclude, it is the NPA’s conclusion that route D2 best fulfils the objectives of the EIA Act on minimizing as possible the negative impacts of a project on the environment. Furthermore, it is the view of the NPA that there remains uncertainty about the effect of the fjords’ crossing on physical aspects of the sea and its littoral and marine life, which requires further research, before decisions are taken on the project. With regard to the known impacts of the proposed project on birch woodland, wetlands, mudflats og salt marshes, species under protection, cultural relics and landscape it is the conclusion of the NPA that routes A1, I and P-H are likely to have significant adverse environmental impacts that cannot adequately be prevented or mitigated.”*

*“In the NPA’s conclusion on the EIA of Vestfjarðavegur (Bjarkalundur-Skálanes) the agency states that the IRA has not convincingly assessed impacts of existing roads on the marine flora and fauna in the fjords that have been crossed.”*

## THE INDEPENDENT ROAD ENGINEERING APPRAISAL.

The local council decided to seek independent road engineering appraisal of the two alternative routes. They asked both the Norwegian company Multiconsult and later the Icelandic company Viaplan to do this. To make the story short, Multiconsult proposed a new alternative “leið R” and Viaplan agrees that this is the best solution, both from social and environmental points of view. Their reports can be found here:

Multiconsult (in English): <http://www.reykholar.is/wwwreykholarisvest60/skra/1949/>

Viaplan (in Icelandic): <http://www.reykholar.is/wwwreykholarisvest60/skra/2007/>  
<http://www.reykholar.is/wwwreykholarisvest60/skra/2008/>

According to Viaplan (and Multiconsult), the route “leið P-H” through (actually along) Teigsskógur wood and over the mouth of two fjords: Djúpifjörður & Gufufjörður is the ***far worst*** of all the proposed routes from the environmental point of view.

## ADDITIONAL INFORMATION.

The planned road (route P-H) with three new fjord crossings would be harmful for large areas of important intertidal areas of importance to arctic migratory waders and other bird life in the nature reserve of Breiðafjörður. This nature reserve has suffered in the last decades much encroachment as many side fjords belonging to the nature reserve have been damaged with roads, land fillings and bridges. This has threatened the integrity of the nature reserve on large scale and the supposed new roads will do so even further. Thus, the staging areas for Red knot (*Calidris canutus*), Sanderling (*Calidris alba*), Turnstone (*Arenaria interpres*) and Brant goose (*Branta bernicla*) are under constant threat and much has been lost, thus threatening the integrity of this valuable nature reserve for millions of migratory birds and the many breeding birds in the area.

All the environmental reports and other reports regarding this are in Icelandic (except the Multiconsult report). I have translated a few statements from some these reports, including a report from November 2018 on necessary changes of the Master Plan of the Reykhólahreppur municipality regarding the road building, see below.

Many other reports can be found on <http://www.reykholar.is/wwwreykholarisvest60/>

“The “Teigsskógur” forest in Þorskafjörður has some special features among the forests in NW-Iceland. According to the Government's Forestry recent measurements it is about 667 ha in area and thus one of the largest forests in NW-Iceland. The width of the forest is mostly between 400-500 m.

The density of the birch in the forest is unique. At locations in the middle part of the forest, big *Sorbus*-trees can be seen. The future of the forest may be, in its uniqueness, a holistic and special ecosystem.” (clause 4 - page 6)

“Route Þ-H has a significant negative impact on the birch fields in the area due to the high disturbance of the “Teigsskógur” forest which has a great ecological importance. A new Westfjords road, that will follow route “Þ-H”, will reduce its ecological importance. The impact on marine herbs and salt marshes is permanent and irreversible.” (clause 6.4.1 - page 16).

“All the effects caused by the roadworks within protected areas and protected ecosystems are permanent and the effects irreversible and in addition not complying with the laws and regulations. Therefore, the effects effect of route Þ-H on the protected area of Breiðafjörður bay, areas of nature conservation, special birch trees, sea urchins and clays along with wetlands is significantly negative.” (clause 6.4.1 - page 18).

“The effect of the proposed project on the landscape is most of the routes Þ-H, but then D2. Unique landscape units are clearly the most affected by the routes going through *Grónes* and *Hallsteinsnes* (route Þ-H). This is a comprehensive landscape that has a great variety of textures, colors and shapes. The effects are irreversible and permanent and are therefore considered to be significantly negative. In addition, route Þ-H goes through *Teigsskógur* and there is also a significant negative impact.” (clause 6.4.1 - page 18).

“The road construction according to route Þ-H will have a significant negative impact on ecosystems that are protected by Act no. 80/2013 on nature conservation.” (page XV).

From the 2005 report: “Although the road construction itself disturbs only part of the forest, it’s shape causes that almost all of the forest is affected by the construction. Most of the forest is 200-500 m wide and therefore a road through it, and opening of material-mines, will also have a significant impact on the rest. Five of the six mining areas are also rocky areas which provide shelter for the forest where it is the most important”. (page 79)

In 2007 a committee under the Environmental Ministry published a report on the protection of birch forests (woodlands) in Iceland. They suggest that at least 9 forrests in Iceland should be protected, including “Teigsskógur”. They said: “*The Committee considers these birch forests to be key areas when considering the protection of large continuous birch forestry systems and habitats of various plants and animals thriving in the shelter of the forests, while protecting the biodiversity of birch.*” They also suggested to strengthen the environmental protection laws (clause 39) to protect the birch forests, and it should be the plan that at least 10% of Iceland be covered with such birch woodlands.

In a report from December 2016, the Marine and Freshwater Research Institute of Iceland simply says about “route Þ-H”: “No research has been done on the benthic zone of the fjords within the crossings and very little outside. Despite of that, it is stated in the EIA report from the IRA, that insignificant effects will be on the environment within the crossings of the fjords. Arguments and knowledge are missing for this statement”. – “The Marine Research Institute strongly opposes this alternative” (i.e. route Þ-H).

According to the foregoing, it may be clear that a road that diminishes the protection value of “Teigsskógur” conflicts with government policy on the protection of Iceland’s biota.

By road line “Þ-H” there will be a disturbance to ecosystems that are protected by Article 37 of the Nature Conservation Act (44/1999), but the article deals with special protection of ecosystems, and there are, among other things, listed sea urchins and clay flats. The road line also contradicts the objectives of the Act on the Protection of Breiðafjörður bay, which states that the aim of the Act is: to promote the protection of Breiðafjörður bay, in particular landscape, geological formations, biosphere and culture.

Breiðafjörður bay has an international nature conservation value and the Icelandic government has proposed that the site will be placed on the UNESCO World Heritage List. In the Biological Protection Agreement diversity, that Iceland is a member of, says that the protection of ecosystems

and natural habitats should be promoted and the maintenance of viable species in their natural environment.

The White-tailed Eagle (*Haliaeetus albicilla*) enjoys special protection according to Art. Act no. 64/1994. The eagle is also on the red list of The Icelandic Institute of Natural History and also on the IUCN International Conservation Association list. Breiðafjörður is on the list of important bird areas in Europe and on a list of coastal areas of the Nordic Region that is important to protect.

Due to Iceland's responsibility for bird species that have a habitat in the Breiðafjörður bay or migratory birds that pass through the bay, this area should be protected as far as possible.

*Simply*: Route D-H is the far worst of all the alternatives. This can also be seen in the report by Viaplan.

Best regards

On behalf of myself and the other complainants.

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*Paris quadrifolia* in the proposed roadline in the Teigsskógur wood. This species is strictly protected in Iceland.



*Melampyrum sylvaticum* in Teigsskógur. A very rare species in Iceland.



A view over a part of Teigsskógur.



The path along the northern part of Teigsskógur.



A view over a part of Teigsskógur.



A view over a part of Teigsskógur.

And more photos from the area:

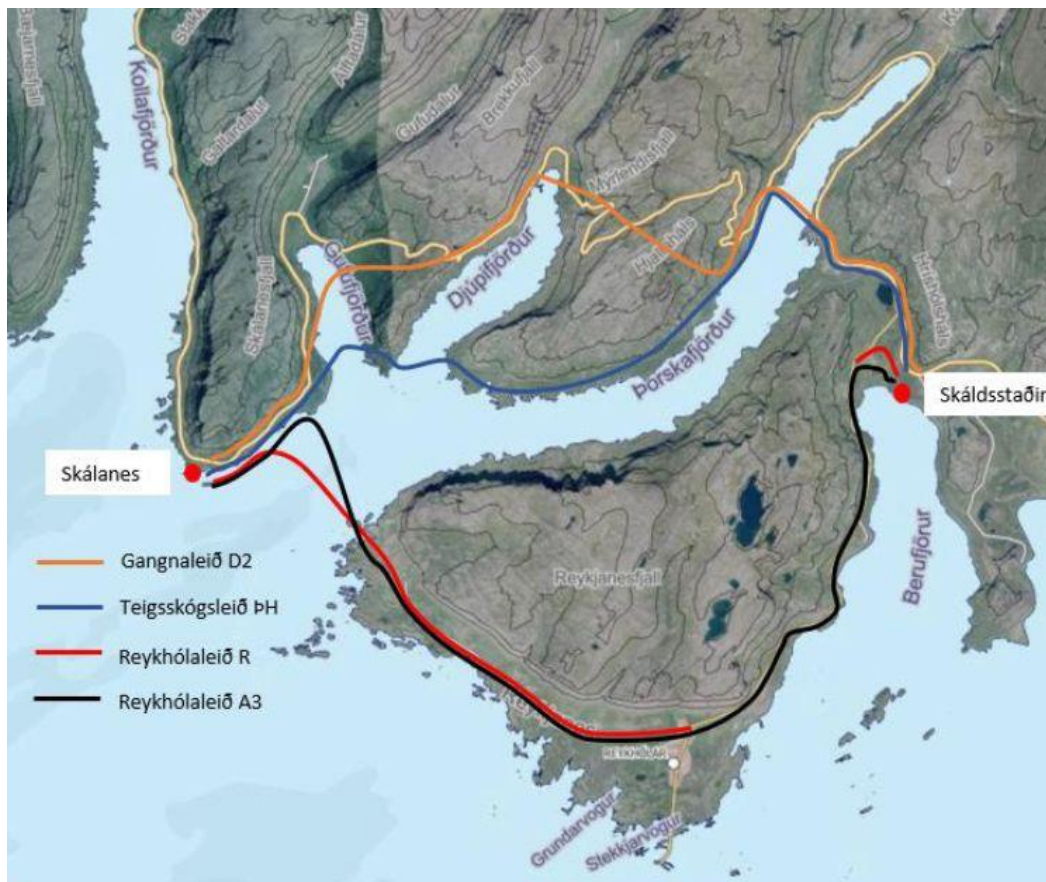


Red colour: Fjords, intertidal areas and sea lagoons that have been altered or blocked by road building.  
 Green colour: Fjords that are planned for the road construction, including route P-H (the three fjords).  
 \* A planned future road crossing of the Vatnsfjörður fjord, which is a special nature reserve within the Breiðafjörður nature reserve.





Teigsskógur is the green area on the south coast of the peninsula in the middle of the photo. The Djúpi fjörður fjord is on the left, but route P-H will cross the mouth of that fjord. It will also cross the mouth of Gufufjörður further to the west (to the left).



Route R, proposed by Multiconsult, is shown here in red color. It would protect both the Teigsskógur wood and the fjords Gufufjörður and Djúpi fjörður, which are important areas for migrating birds, including Red Knot (*Calidris canutus*). Djúpi fjörður is also very important for birds that use the seagrass *Zostera marina*.