

Abstract (submitted spring 2018):

The purpose of this presentation is to give an overview of the status of environmental assessments in international law, and to review the progress of a global and a regional process in trying to improve the current regime.

The international regime for environmental impact assessments (EIA) in the Arctic Ocean is symptomatic for the situation in most regional seas. There is a predominance of requirements that are unspecific about the content and the process of the assessments. The Law of the Sea Convention does not even specify that its assessment obligation refer to EIA for projects, nor strategic environmental assessments (SEA) for policies, plans and programmes. The lack of a default and specific obligation to conduct EIA and SEA, leads to a patchwork of assessment obligations according to type of activity and area covered. The Convention on Biological Diversity contains the most specific obligations, transnational for the special purpose of assessing impacts on biodiversity. The Espoo Convention and its SEA Protocol are specific for transboundary procedures, but apply to few marine activities.

“EIAs” are included in the upcoming UN negotiations about a new legally binding instrument on biodiversity in areas beyond national jurisdiction (ABNJ). The recommendations from a Preparatory Committee indicate that a future instrument may clarify thresholds and criteria for undertaking EIA, the process, and the content of final

reports. The institutional aspects including decision-making seem more unclear. The Committee has suggested that the assessment obligation should be limited to planned activities *in* ABNJ. That will exclude the obligations of states to assess the transboundary impacts on ABNJ caused by activities located in areas within national jurisdiction. Moreover, the recommendations are open as to whether the instrument should address SEA. That may be understandable since SEA, as opposed to EIA, has not attained the status of customary law, and is more open-ended as regards process and content. However, there is a strong need for strategic assessments in the Arctic Ocean and other seas as human activities expand. Attempts to link the procedural obligation of conducting an assessment closer to substantive regulations have been raised in the process, but is not reflected in the Committee's recommendations.

An Arctic Council Task Force on increased marine cooperation did not recommend regional initiatives to address shortcomings in the regional assessment regime. However, the Arctic Council has initiated a project to compile and disseminate best practices.

### **Background:**

The presentation builds on:

- Sander 2016: "International legal obligations for environmental impact assessment and strategic environmental assessment in the Arctic Ocean. *International Journal of Marine and Coastal Law* 2016; Volum 31. pp 88 - 119. doi: [10.1163/15718085-12341385](https://doi.org/10.1163/15718085-12341385).

Summary of the article:

Environmental impact assessment (EIA) and strategic environmental assessment (SEA) are tools for the prior assessment of impacts of proposed developments before decisions are taken. Customary law and most international agreements relevant for the Arctic Ocean are unspecific about assessment tools and content. The Espoo Convention and its SEA Protocol are the only specialised instruments available. They do not cover marine activities well, and not all the Arctic Ocean coastal states are parties. Other problems are related to uneven geographical and sectoral coverage. Weaknesses may be addressed both globally in the negotiations on a new instrument under the Law of the Sea Convention (LOSC) on biodiversity beyond national jurisdiction, and in a regional process under the Arctic Council. Important improvements would be the creation of a more specific default mechanism for prior assessment of marine activities and closer linkage of assessments with substantive goals.

## Overview

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The status of environmental assessments in international law,

Review the progress in two processes:

- The BBNJ process
- Arctic Council



«Glacial speed of progress».  
Time for a surge?

A glacial speed of progress: that is how I have perceived the global BBNJ process and Arctic Council attempts to address EIA and SEA the last 10-20 years.  
Signs of a surge now?

## What is (Environmental) Impact Assessment?

A decision-support tool:

- Ex ante prediction of impacts
- Ex post monitoring.

Purpose: Avoid and mitigate harm throughout the life-cycle

A procedural tool, not substantial regulation:

- May prohibit uninformed, but not unwise decisions (US Supreme Court)
- Stronger coupling to substance?

A proliferation of types of assessments, covering:

- Different values/interests: environment, social, health, economy biodiversity...
- Initiatives at strategic + project level: SEA, EIA
- Domestic + transboundary assessments (TEIA)
- all building on the same basic ideas

Ex post monitoring often seen as “something else” - Environmental management systems

Legal obligation: assessing the final proposal

Planning: integrated into planning process when elaborating the proposal

Different from planning, different from state of the environment reports.

«End of pipe» approach?

Procedural tool: Link EIA stronger to substance when significant harm?

SEA: policies, plans and programs + legislative proposals

An arena for interplay between different interests and values. Social learning.

## Current legal status

EIA is customary law, SEA not

Specificity matters for influencing behaviour:

- Predominance of unspecific instruments: EIA/SEA not mentioned. LOSC art 206: «**assess potential effects**» of «**planned activities**» - «**significant**» changes
- EIA/SEA specified: CBD art 14, ISA on mining (Regional Seas Conventions)
- Specialized EIA/SEA instruments: Espoo convention on TEIA+ SEA protocol (Madrid Protocol - Antarctica, EU law)

Main question:  
To what extent do states want binding, specific regulations?



The article:

Interpretation across instruments for Arctic Ocean + literature about EIA effectiveness. The interpretation for the Arctic Ocean is symptomatic for regional seas without specific regulations for EIA and/or SEA. Such legal frameworks can be found in regional seas organizations, EU law, and the Madrid protocol to the Antarctic treaty. Put in parenthesis here since outside the geographical scope of the Arctic marine area.

Neil Craik: “Whether the norm has achieved customary status is of secondary importance where the norm itself lacks the necessary detail to influence behaviour”

LOSC art 206:

“When States have reasonable grounds for believing that planned activities under their jurisdiction or control may cause substantial pollution of or significant and harmful changes to the marine environment, they shall, as far as practicable, assess the potential effects of such activities on the marine environment and shall communicate reports of the results of such assessments in the manner provided in article 205.”

Ref also art 204 on monitoring of risks or effects of pollution, and art. 205 about publication of reports.

PREPCOM – “Chairs streamlined..” # 153 refers to the option of developing general

guidance/guidelines to art 206.

PREPCOM – “Chairs streamlined..” # 152 mentions Espoo, CBD voluntary guidelines, FAO deep-fisheries guidelines, ISA recommendations and Madrid protocol as candidates to be referred to.

## Gaps in the Arctic Ocean (and elsewhere)

1. Insufficient acceptance of existing instruments

2. Major sectors no or uneven assessment obligations beyond LOSC

\* Fisheries: In NEAFC area for new bottom fisheries. Not for pelagic fisheries + AWNJ

\* Shipping and marine tourism: No requirements.

\* Oil and gas: Patchy

3. Espoo (TEIA + SEA): Low marine relevance

4. Strategic level not covered well

5. Spatial scope:

\* Weak coverage of ABNJ

\* Weak obligations for domestic assessments

2 + 5 =>

Need transnational rules: lift the floor, lex specialis towards the ceiling

ABNJ: Activities in AWNJ must be included to capture potential harm to ABNJ.

Domestic assessments: States have sovereign rights to exploit their resources according to their own policies, according to the no-harm principle

Need for transnational: both because uneven coverage of sectors and

## A new implementation agreement under LOSC on biodiversity in ABNJ

Long process:

- Ad-hoc Open-ended Informal WG 2006 - 2015
- Preparatory committee 2016-17
- Negotiations 2018 - 2020
  
- A package since 2011:
  - \* Conservation and use of marine biodiversity, incl. marine genetic resources and benefit sharing
  - \* Measures such as area-based management tools, incl. MPAs
  - \* **Environmental impact assessments**
  - \* Capacity-building, transfer of technology
  
- PREPCOM:  
Clearer on issues and options



Marine areas beyond national jurisdiction (ABNJ) = High Seas (picture) + Deep Seabed («the Area»). Area covers 45% of the Earth's surface

Kristine presented yesterday.

Loong time without progress. PREPCOM + first meeting made more concrete

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High seas comprise 64% of the oceans – or 45% of Earth's surface (71% is oceans).

**Ad-hoc open-ended process** seemed to produce little clarification. There were workshops on the relevant topics in 2013, which gave a rather basic presentation of EIAs.

### **PREPECOM:**

Structure of process: Plenary meetings and four separate informal working groups, one of which on EIAs, facilitated by a Dutch diplomat, René Lefeber.

After 1<sup>st</sup> meeting, the PREPCOM chair produced an indicative list of clusters of issues and questions to those in order to structure the discussions at the 2<sup>nd</sup> meeting. Good and relevant. Was followed by a non-paper after the 2<sup>nd</sup> meeting (presented to the 3<sup>rd</sup>) and finally a "Chairs streamlined non paper" after the 3<sup>rd</sup> meeting on elements of a draft text (presented to the 4<sup>th</sup>). This built on the previous non-paper and included suggestions from the delegations, as a reference document, without evaluating the extent to which ideas and proposals enjoy support.



The conclusions of the process after 4<sup>th</sup> meeting were listed in final report. This is rather brief, and contains the proposals in two non-exclusive lists. List A “generated convergence among delegations”. List B contain “main issues on which there is divergence of views.” This is a summary that does not reflect all the details about different suggestions found in the “Chairs streamlined...” presented to the 4<sup>th</sup> meeting.

**Intergovernmental Conference:**

Negotiations were prepared by a three days Organizational meeting on a zero draft in April 2018.

First substantive negotiations September 2018 – IGC1. Conclusion of meeting (ENB 25/178):

“President Lee proposed issuing a document by 25 February 2019, for consideration at IGC-2, with treaty language, reflecting different options, to lead to focused discussions and the identification of areas of convergence, as well as areas requiring further discussion. She clarified that the document will not be “a full treaty text, from preamble to final clauses,” and will probably not be called zero draft. Noting that the document will include IGC-2 organizational modalities, she emphasized that the process leading to a zero draft will be state-driven.

In the Corridors:

(...) Whatever the level of optimism, delegates unanimously welcomed the production of a text with treaty language by President Lee, hoping that this would definitively switch IGC-2 into negotiating mode. As a long-standing participant pointed out: “it does not matter whether you call it a ‘zero’ or ‘sub-zero’ draft, it’s the content that counts.” »

ENB’s full coverage of the meeting:

[http://enb.iisd.org/oceans/bbnj/igc1/?utm\\_medium=email&utm\\_campaign=2018-09-14%20-%20BBNJ%20NYC%20-%20ENB%20-%20English%20-%20issue9%20SW&utm\\_content=2018-09-14%20-%20BBNJ%20NYC%20-%20ENB%20-%20English%20-%20issue9%20SW+CID\\_49e5f45acb28909a817ed3ff8604d1b4&utm\\_source=cm&utm\\_term=httpenbiisdorgoceansbbnjigc1](http://enb.iisd.org/oceans/bbnj/igc1/?utm_medium=email&utm_campaign=2018-09-14%20-%20BBNJ%20NYC%20-%20ENB%20-%20English%20-%20issue9%20SW&utm_content=2018-09-14%20-%20BBNJ%20NYC%20-%20ENB%20-%20English%20-%20issue9%20SW+CID_49e5f45acb28909a817ed3ff8604d1b4&utm_source=cm&utm_term=httpenbiisdorgoceansbbnjigc1)

## A problematic geographical scope: Transnational needs vs only ABNJ

		Areas affected by the impact	
		Coastal state zones	High Seas and the Area
Location of activity	Coastal state zones	SEA-protocol SEA-protocol Espoo convention	Probably not covered
	High Seas and the Area	Probably covered ISA deep seabed mining	Covered ISA deep seabed mining

Dotted area: Domestic assessment. Treaties: Specific, apply to the Arctic Ocean

If no transnational regime:

How to improve Espoo (scope + relevance) + domestic EIA law?

### Geographical scope:

The figure shows the geographical scope of existing treaties that are 1) specific about EIA and 2) apply to the Arctic Ocean, according to where the activity causing potential harm is located, and where the harm may affect. (ref 2: Most important exclusions are Regional seas conventions, EU law and the Antarctic treaty. Can easily be added, as relevant, for analyses of other regions).

PREPCOMs suggested scope for the new treaty is ABNJ, whereas rights and jurisdictions of coastal states in AWNJ will be respected. What does that mean, ref the quadrants in the matrix?

- Location in ABNJ -> harm in ABNJ will be covered (lower right quadrant).
- Seems to be agreement also to include TEIAs of ABNJ -> AWNJ. (See «Chairs streamlined # 184). This is an improvement since ISA regulations now are the only specific regulations covering this - for deep-water mining
- Seems to be few voices in the negotiations who argue for including TEIAs of AWNJ -> ABNJ. (See conflicting views in «Chairs streamlined ... # 183 – check minutes from negotiations in Sept 2018).

This is the same weakness as in the Espoo convention, which only covers the traditional situation of harm to other states, not ABNJ (however, generally low relevance in marine areas due to other scoping conditions). Coastal states more interested in protecting their rights than taking responsibility for activities in their

areas affecting ABNJ?

- Upper left quadrant: Domestic EIAs and TEIAs between coastal states will not be covered by a new instrument. Means that CBD and the Espoo instruments, with low marine relevance, will continue as the only specific instruments for these situations.

With these restrictions, it does not seem that we will get a transnational instrument covering all marine situations.

What could be the improvements, either in the negotiations now, or in other instruments, to improve the situation for the two upper quadrants?

- LOSC: How would LOSC art 206 be affected by the negotiations? Elevate the floor by interpretation? Gradually new customary law? Open the big package – the treaty itself?

It has been suggested during the process to provide guidance to LOSC art 206.

The US (?) also has called on coastal states to improve their legislation to cover AWNJ - > ABNJ.

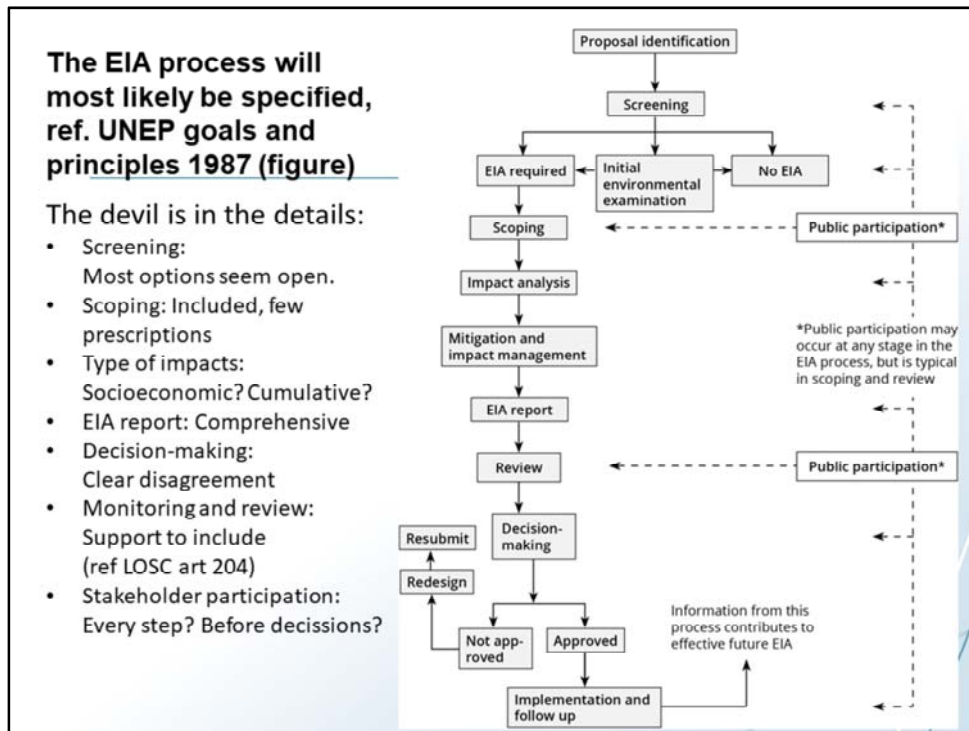
- Espoo should be improved to increase its marine relevance: Integrate same thematic scope as the new instrument. Make applicable towards ABNJ.

#### **Thematic scope:**

The objective suggested by PREPCOM is to ensure the conservation and sustainable use of marine biological diversity. Implications for:

- What impacts to cover in assessments.
- What types of activities that may be covered

Thus, will affect screening, scoping and rest of the process.



The situation now, ref. my analysis: Can we assume that everybody agrees that the UNEP principles depicts the general content of EIA – accepted by everyone, even those who have not ratified specific instruments? International courts have not dared to say yes. Could say yes only based on interpretation of general capabilities and obligations of individual states in other circumstances.

PREPCOM list A, # 5.4 mentions all steps here in a little different wording (not mitigation, but comes in # 5.5).

Negotiations in September: Strong groups (G77 + China, EU) argue to include most steps in the process more or less according to the UNEP principles. Good!

However: Much loose ends and disagreement when we consider the individual steps. The devil is in the details.

**Screening:** A chicken-and-egg problem: Must conduct an EIA to determine if there are significant impacts, but EIA will only be conducted if significant impacts. Means that all approaches are ways of finding proxies for significant impacts – without having conducted the EIA yet.

Question listed by chair to PREPCOM 2: «What criteria might trigger the requirement to conduct SEAs, EIAs and TEIAs?»

«Chairs streamlined...» (# 160), options:

- Mandatory for all activities,

- Different attempts to define threshold level (why deviate from significance?)
- Several options for listing activities: Inclusive lists, exclusive lists,
- Include or exclude when EIA already required by another instrument?
- Activities in areas of particular interest: no options provided.  
Rene Lefebvre at meeting in September: convergence to require EIA for all activities in such areas.
- The wording of the Antarctic Treaty and a differentiated process is on the table: minor and transitory impacts. Rene Lefebvre after WG on negotiations in September referred to «a tiered approach». Has been proposed by at least the African group and Korea during the first meeting.

**Scoping:** Good that it is included : is the probably most decisive step in the EIA process, and is not included in all international instruments (Espoo)

Little concretization on scoping. Could refer to identification of alternatives, impacts and methods.

**EIA report** – criteria for content (PREPCOM list A, 5.5): «Reasonable alternatives» mentioned.

Socioeconomic impacts are mentioned, however, cumulative impacts is controversial: At IGC1, USA was pro, Russia against, whereas Norway argued about the difficulty of assessing cumulative impacts. China/G77 will have cumulative + socio-economic impacts. Check details on: health, cultural and socioeconomics.

Chairs streamlined...» #162 refers options for cumulative impacts, if include (examples of types of, or «as far as practicable»)

# 179 An even more thorough list than in final report from PREPCOM. On types of impacts: «Cumulative, direct, indirect, short-term and long-term, positive and negative effects.»

**Decision-making:** Either by State party, or internationalized (see later slide)

«Chairs streamlined # 174: ensure that the outcome of EIA taken into account in decision  
# 175: Only possible to permit when no significant harm likely – after mitigation measures

**Monitoring and review** is included, with reference to LOSC art 204-206 (PREPCOM list A, 5.4, 5.5 and 5.6). Good! Tend to be let out in certain EIA frameworks.

See also «Chairs streamlined ...» # 201 – 205.

Rene Lefebvre in September reported on: convergence on EIA reports to indicate (...) an environmental management plan

**Stakeholder participation:**

\* For each and every step, or just before decision-making? (Chairs streamlined # 164)

\* Restricted to States/IGBs +relevant NGOs, relevant experts + affected industries. (# 165)

## **Responsibility: Flag state or internationalized?**

Clear disagreement on the extent to which international bodies (scientific/technical/administrative and decision-making) shall be responsible, or the States

Pronounced for:

- Screening with decision about need for EIA
- Oversee the whole process and advice a decision-making body
- Decision-making and permit to proceed with the activity
- Monitoring and review

Important issue not explicitly adressed:

Quality assurance of the assessment

Chairmans's questions relevant for institutional arrangements after 1<sup>st</sup> meeting of PREPCOM:

- Responsibility for deciding that an EIA, SEA and TEIA is required?
- Responsible for conducting the assessments?
- Who should bear the costs?
- Who might review?
- Who decide whether activity should proceed?
- Time frame?
- Responsibility for monitoring and review?
- What institutional arrangement might be needed?

PREPCOM final report, section A, contains a separate «section IV Institutional arrangements» (page 15 – 16), containing these headings:

1. Decision-making body/forum
2. Scientific/technical body
3. Secretariat

with descriptions of their possible functions.

“Section V, Clearing-house mechanism” contains a description of functions also for EIAs: repository of reports etc. More elaborate in “Chairs streamlined ...” # 195.

Section B states: ... further discussions are required on the degree to which the process should be conducted by States or be “internationalized”.

PREPCOM “Chairs streamlined”:

# 155: The obligation to conduct EIA would rest with the State under whose jurisdiction or control..

# 168: A scientific/technical body could oversee the EIA process, review proposals and provide recommendations to a global d-m body, carry out ex-post evaluations. A pool of experts to conduct assessments

# 169 An EIA/SEA administrative oversight committee – make guidelines, follow process

# 173: A decision to proceed with activity could be made by the State party or an international body created under the instrument

# 202: Slightly different options for states and activities of a secretariat/scientific body. In any case, good that they refer clearly to LOSC art 204.

IGC 1: Rene Lefeber reported to plenary on:

\* options on modalities and degree of internationalization for decision-making, public consultation, monitoring and review, and compliance and enforcement;

\* options on internationalization, with global institutional arrangements managing at least part of the decision-making and/or monitoring and review process, to ensure global coherence;

See from ENB’s summary that i.a. the US and Russia are against internationalization, Japan sceptical.

G77/China proposed establishin an M&R body.

## SEA: Clear disagreement

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### PREPCOM:

- «The text could address SEA»
- «further discussions are required»

### Positions at first negotiations:

- EU, Canada, Int. ENGOs argue in favour,
- Many states ask questions
- Russia + USA against:  
"LOSC does not require SEA", time, costs, responsibility

### Problematic situation:

- Cumulative impacts a major reason for regional assessments = SEA
- Will strengthen Regular process + regional bodies + ecosystem-based mgt.
- Assessing strategic initiatives: Too complicated rules so far (Espoo, EU)?

PREPCOM list A, 5.7: «The text could address SEA». A footnote suggests that it might be considered in a different section of the instrument, such as area-based management tools, including MPAs.

PREPCOM list B: «(...) further discussions are required (...) on whether the instrument should address SEAs.»

«Chairs streamlined ...» # 186: Option 1 is to exclude SEA. Option 2 is to include, but unclear. Interesting that they refer to regional assessments, which is strongly needed i.a. for EBM and Regular process.

Renee Lefeber at the negotiations in September, reported on:

\* options on scope, level, and responsibility for strategic environmental assessments (SEAs), with some preferring to exclude SEAs from the ILBI due to complexity, cost, and length of time required for completion. (See ENB)

ENB summary & Analysis: EU, Canada + Int. ENGOs referred arguing in favour of SEA. Several states had questions. The US and Russia are against; US stating the LOSC does not require SEA, and it is unclear who should conduct them.

Older –



## Relation to other instruments

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- Blir dette et gulv som løfter, med lex specialis på toppen?

PREPCOM final report (p. 8-9). LBI will:

- not prejudice rights, jurisdiction and duties of States under LOSC
- Promote greater coherence with and complement existing relevant legal instruments and frameworks, and relevant global, regional and sectoral bodies.
- “not undermine” these

What is the implication?

Older – “Chairmans streamlined ...” # 186 – 193:

Not undermine existing instruments

Respect existing guidance

Avoid duplication

Coordinate with, not substitute, existing organizations

Cooperation and info sharing

Renee Lefeber at meeting in September: Referred to functional equivalents to EIAs.

What is that? Should be brought on the table and discussed.

### **Other issues:**

Capacity-building will include EIA-relevant topics. See also “Chairs streamlined ...” # 197 – 200 (EIA) + 206 - 222 (for all topics).



## Arctic EIA guidelines 1994 - 97

### GUIDELINES FOR ENVIRONMENTAL IMPACT ASSESSMENT (EIA) IN THE ARCTIC

ARCTIC ENVIRONMENTAL PROTECTION STRATEGY



Main purpose: Adapt EIAs to Arctic conditions

No impact on practices

Later, mentioned in:

- Oil & gas guidelines: SEA
- SAO recommendations

Informal discussions: what next?  
Finnish projects outside Arctic Council

Finnish initiative in Arctic Environmental Protection Strategy. Received high attention in AEPS and was a prioritized issue. Resulted in the guidelines, and a web site. Adopted in Alta 1997 in parallel with Oil and gas guidelines. Attempts to foster further activities has stranded. Today, EIA in the Arctic is no longer in focus in Arctic Council. What can be done to revitalize Arctic EIA – and SEA?

Legally non-binding.

Oil and gas guidelines: Left-handed treatment, limited to one sector. Perhaps most important: recommended EIA.

SAOs in 2009 report to ministers:

“Urge that any future exploitation of natural resources in the Arctic must be based on [...] thorough **impact assessments**, to ensure safe and environmentally sound activities at all times.

Consider the need for [...] a set of operational guidelines for **assessing the impacts of projects, plans and programmes** in the Arctic.

*Urge that (...) guidelines (...)adopted by the Arctic Council, should be implemented (...),*

*including efforts to harmonise legislation as necessary, and that competence building and education are important instruments for facilitating this implementation.*

## Regional collaboration

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1. Non-legal approaches: Best practices, education, exchange, research etc

2. Bilateral, regional or multilateral agreements on EIAs mandated by:

- Espoo convention art. 2(9) and 8
- CBD art 14(1)c
- LOSC art 197

The Arctic states could negotiate an agreement tailored to their special interests and needs.

Unlikely to make progress now: ref positions of certain Arctic states in the BBNJ negotiations.

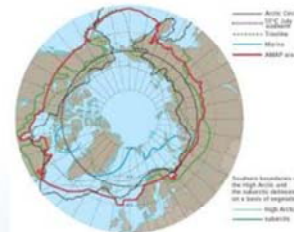
USA: SEA is against LOSC

Russia:

## Arctic Council task force on increased cooperation in Arctic marine areas

2015-17, Final report:

- EIA and SEA not mentioned.
- Need to enhance capacity for integrated, holistic view of AO. Link assessment to decision-making.  
=> SEA?



The Arctic marine area is wider than the Arctic Ocean

2017 – 2019:

Negotiate ToR for a new subsidiary body + enhancements to existing mechanisms in AC



Mentioned by Christian Prip yesterday.

Mandate: “Assess future needs for a regional seas program or other mechanism, as appropriate, for increased cooperation in Arctic marine areas.”

Ecosystem approach requires substantial knowledge inputs. Collaborate on marine science as a basis for decision making. Refer to the Arctic Council efforts on assessments. (p. 4)

Conduct of scientific assessments.

## SDWG project on best practices

**Rationale:**  
Incorporate environmental considerations into planning, design and decision-making of large-scale projects.

**Objectives:**

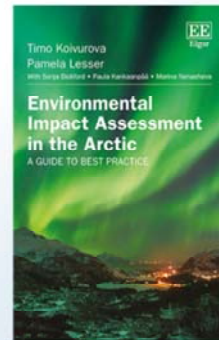
- Identify good EIA practices, develop recommendations
- Promote meaningful practices of public participation
- Build a viable network of Arctic EIA actors.

**Activities:**

- Questionnaire
- Regional workshops
- Newsletter
- Arctic Energy Summit 2017, EIA session

**Link:**

<https://www.sdwg.org/activities/sdwg-projects-2017-2019/arctic-eia/arctic-eia-new/>



### Mandate:

The objectives of the project are:

- (1) to ensure that environmental considerations specific to the Arctic, including social and health aspects, are explicitly addressed and incorporated into the planning, design, and decision-making of large-scale projects,
  - (2) to identify existing good practices through sharing and learning with the aim of developing good practice recommendations for EIA in the Arctic,
  - (3) to promote meaningful practices of public participation, especially the participation of indigenous peoples, and the integration of TLK in EIA within the Arctic,
- and
- (4) to build a viable network of Arctic EIA actors.