

**Ramsar Secretariat**  
**c/o Tobias Salathe**  
**28 Mauverney, CH-1196 Gland**  
**Switzerland**

*Reykjavík, September 26 2012*

Landvernd, the Icelandic Environment Association, and Fuglavernd, BirdLife Iceland, wish to call the attention of the Ramsar Secretariat to the proposed construction of the first phase of a 90MW geothermal power plant in the vicinity of the Mývatn-Laxá Ramsar site (no. 167). Scheduled to start later this year, the Bjarnarflag Project may severely threaten the ecological character of the Mývatn-Laxá ecosystem. Environmental problems relate to pollution from plant operations, including waste water run-off, changes in temperature of groundwater inflow into the lake, and airborne hydrogen sulfide (see the attached supporting document).

Under Article 3.2 of the Ramsar Convention, Parties are expected to report to the Secretariat any changes or threats to the ecological character of their listed wetlands. As a third party and environmental NGOs in Iceland, we hereby urge the Ramsar Secretariat to take action on the aforementioned matters by requesting Icelandic authorities to:

- a) thoroughly investigate and subsequently communicate to the Secretariat any potential threats to the Mývatn-Laxá ecosystem resulting from the proposed geothermal power plant<sup>1</sup>;
- b) consider to nominate the Mývatn-Laxá Ramsar site to the Montreux Record;
- c) ensure that adequate surveillance and monitoring programs be set in place by the developer in co-operation with the relevant governmental organizations and the Mývatn Research Station (RAMY).

Also, we draw the attention of the Ramsar Secretariat to the fact that the most recent RIS information for the Mývatn-Laxá Ramsar site dates back to 1992. In the last 20 years, many changes have taken place in the area. Potential threats to the Mývatn-Laxá ecosystem include increasing tourism and urbanization, hydro power development in River Laxá and as mentioned above, geothermal power plant construction, both in Bjarnarflag as well as in the Krafla area. In addition to this, National Ramsar Wetland Committee does not exist in the country. We urge the Secretariat to request explanations on these matters as well.

Sincerely,

---

Gudmundur Ingi Gudbrandsson  
*Managing Director of Landvernd*  
Skúlatún 6, IS-105 Reykjavík  
E-mail: [mummi@landvernd.is](mailto:mummi@landvernd.is)

---

Hólfríður Arnardóttir  
*Managing Director of Fuglavernd*  
Skúlatún 6, IS-105 Reykjavík  
[holmfridur@fuglavernd.is](mailto:holmfridur@fuglavernd.is)

A copy sent to the Icelandic Ministry for the Environment and the Environment Agency of Iceland.

---

<sup>1</sup> We specially refer to the conclusions of the supporting document and questions that are raised in there.