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**Technical expertise: Names collection, office treatment,
features beyond a single sovereignty and international cooperation**

**Documentary evidence in geographical names management:
pitfalls of circular reference and institutional self-documentation**

Submitted by Norway**

Summary:

The report shows that the Norwegian legal and administrative framework for geographical names standardization faces significant challenges in implementation, despite having a comprehensive legal and regulatory structure. Analyses of standardization practices reveal concerning examples of discrepancies between legal requirements and practical application, particularly in terms of documentation standards and institutional processes.

A detailed case study of two municipalities in eastern Norway demonstrates how current standardization practices can deviate from legal requirements. The report shows that documentation procedures and law implementation vary. In one of the cases outlined, despite the existence of clear historical documentation and recorded local, inherited pronunciation supporting one form, the national geographical names database maintains another standardized form, contradicting both historical evidence and current cadastral usage.

As a result, that inconsistency extends to derived street names, highlighting challenges in coordinating standardization across administrative levels. The situation reveals significant gaps in both municipal and State-level names management competencies, suggesting insufficient understanding of historical documentation and standardization principles, and/or resource allocation.

A key finding is the prevalence of institutional (self-)documentation, whereby standardization decisions rely heavily on internal map sources and cadastral entries. That practice risks creating circular reference patterns, perpetuating potential errors through internal review processes. Similar patterns are found also in municipalities, suggesting a systemic issue rather than mere isolated cases.

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A suggestion is made to establish systematic external monitoring and review processes through formalized relationships with research institutions possessing relevant expertise in onomastics and historical linguistics. A proposed two-tiered system would combine regular expert panel audits with a standing advisory committee for complex cases.

The findings indicate an urgent need to address these challenges in order to maintain the credibility of the Norwegian Place Names Act. The situation calls for enhanced professional expertise, improved documentation procedures and better coordination between administrative levels. The implementation of external monitoring mechanisms appears crucial to ensuring that standardization decisions align with both legal requirements and scientific principles of toponymy.

1. Introduction

The management of geographical names is a critical aspect of cultural heritage preservation and national identity. In Norway, the legislative framework governing geographical names is encapsulated in the [Lov om stadnamn](#) (Place-Name Act) and its accompanying regulations, as outlined in [Forskrift om stadnamn](#) and [Handbok for namnebehandling](#). These texts provide a comprehensive structure for the preservation, standardization, and use of geographical names, ensuring that they reflect the linguistic and cultural diversity of the nation, including Norwegian, Sami, and Kven names.

The *Lov om stadnamn* serves as the cornerstone of geographical name management in Norway. Its primary objective is to safeguard geographical names as cultural heritage and establish uniform rules for their usage in public contexts. The law emphasizes the importance of adhering to national legislation and international agreements concerning the treatment of geographical names. It delineates the responsibilities of various public authorities in the naming process and stipulates that once a geographical name is officially established and registered in the Central Geographical name Register (SSR), all public entities must utilize this standardized form.

Statens kartverk, Norway's mapping authority, plays a pivotal role in the management of geographical names. According to the guidelines outlined in *Handbok for namnebehandling*, Statens kartverk is empowered to initiate naming cases when new names are proposed or when discrepancies arise between its naming conventions and those of other agencies. The authority is also tasked with rectifying errors in name usage, particularly when these stem from misinterpretations of the names themselves. It is essential to note that variations in spelling due to different normalization practices are not classified as errors, thus allowing for a degree of linguistic flexibility.

The Place-Name Act mandates the appointment of name consultants by the Ministry of Culture for Norwegian and Kven names, while the Sami Parliament appoints consultants for Sami names. These consultants are responsible for providing guidance and recommendations to decision-making bodies regarding the establishment of geographical name spellings. This consultative process is crucial for ensuring that the names reflect the cultural and linguistic heritage of the communities they represent, thereby fostering inclusivity and respect for diversity in geographical naming practices.

The Norwegian framework for geographical names management, as articulated in the geographical names law ([Lov om stadnamn](#)), the law regulations ([Forskrift om stadnamn](#)), and administrative implementation handbook ([Handbok for namnebehandling](#)), exemplifies

in principle a robust approach to preserving cultural heritage through standardized naming practices. The law is constructed to ensuring that geographical names are treated with the respect they deserve, and Norway not only honors its linguistic diversity but also sets a precedent for other nations grappling with similar issues. The ongoing collaboration between various governmental bodies and local communities is essential in maintaining the integrity and relevance of geographical names in the face of modern challenges.

2. From Principle to Implementation

However, the transition from legislative principles to practical implementation in the management of geographical names in Norway reveals significant discrepancies, particularly between the *Lov om stadnamn* (Act on Geographical names) and the guidelines set forth in the *Handbok for namnebehandling* (Handbook for Name Processing). These inconsistencies raise questions about the underlying philosophy of name standardization and the implications for cultural heritage preservation.

Documentation Standards: A Dichotomy

The handbook's approach to documentation standards presents an inherent logical inconsistency. It distinguishes between two fundamental aspects of name standardization: spelling standardization and the determination of the *correct* traditional geographical name. For spelling standardization, the handbook mandates the use of only official documents as acceptable evidence. Conversely, when determining the correct traditional name, it permits informal sources such as local history books and oral traditions to be considered valid. This arbitrary distinction is problematic, as both aspects fundamentally aim to document historical language use. A name's spelling reflects how it has been written, while its *correctness* reflects how it has been used within the community.

This inconsistency could lead to scenarios where a local history book might be utilized to argue that a place should be referred to as *Storvik* instead of *Lillevik*, yet the same book would not suffice to establish whether it should be spelled *Storvik* or in the definite form, *Storviken*. Such discrepancies highlight a potential bias in the handbook's criteria, imposing stricter documentation requirements for spelling while allowing more leniency in determining the traditional name. This duality may stem from competing priorities within Norwegian geographical name standardization: the desire for rigorous official spelling standards versus the simultaneous need to preserve local naming traditions and cultural heritage.

Divergences in Standardization Rules and Procedures

A closer examination of the standardization rules in the handbook's section 4.4 reveals divergences from the law text. According to the law, the main rule for spelling is based on local inherited pronunciation, with allowances for deviations if the spelling has been long in use, is well-known, or is well-established. The law also permits parallel forms if multiple pronunciation variants or established written forms exist, reflecting strong local interest.

In contrast, the handbook introduces additional requirements not found in the law. It places significant weight on local consultation responses, prioritizes Language Council recommendations over local input in cases of conflict, and specifies internal administrative procedures that complicate the name processing system. This suggests that the handbook has created a framework of administrative procedures and requirements that extend beyond the law's specifications, potentially leading to a hierarchy that favors Language Council recommendations over local usage, which is not explicitly supported by the law.

Implications of Stricter Interpretations

The handbook's interpretation of exceptions to the main standardization rules appears to be more restrictive than the law itself.¹ While the law allows for deviations from current spelling rules based on established usage and community agreement, the handbook requires extensive official documentation for established spellings and creates a higher threshold for accepting deviations. This stricter interpretation could have several consequences:

- **Legal Consequences:** Local communities may challenge decisions if they can demonstrate that their spelling meets the law's criteria but is rejected based on the handbook's stricter standards. This could lead to conflicts with the law's stated purpose of preserving geographical names as cultural monuments.
- **Cultural Consequences:** The risk of standardizing away historically significant spelling variants could lead to the erosion of local spelling traditions that reflect regional identity. This may create an artificial uniformity that undermines the law's intent to preserve linguistic diversity.
- **Practical Consequences:** The administrative burden imposed by the handbook may foster unnecessary conflicts between local communities and authorities, leading to resistance against official name standardization. Furthermore, the emphasis on written documentation may disadvantage areas with strong oral traditions but less historical official documentation.

The transition from principle to implementation in the management of geographical names in Norway reveals inconsistencies between the legislative framework and its practical application. The handbook's approach to documentation standards and the additional administrative requirements creates a complex landscape that may hinder the preservation of geographical names as cultural heritage. To align implementation with the principles enshrined in the *Lov om stadnamn*, it is essential to seek to reconcile these discrepancies, ensuring that both historical usage and local traditions are respected in the standardization process.

3. Examples of implemented Geographical Names Standardizations

The gap between principle and practice becomes evident when examining specific cases of geographical name registration and documentation, but, surprisingly, not reflecting the handbook's stricter interpretation – quite the opposite. While the law emphasizes the importance of preserving names as cultural heritage through comprehensive documentation, the actual implementation reveals a narrower approach. In the following are some detailed analyses of representative cases that illuminate what the documentation practices are, and where they fall short of the law's intended scope. This examination provides concrete evidence of the systematic challenges in current implementation practices, especially regarding documentation sources and verification procedures.

Example Fritsø:

The documented history of the geographical name [Fritsø](#) in Tønsberg municipality spans over 600 years, with forms recorded from 1380 to the present, as found in [Stadnamnportalen](#):

1380 i Fresiom (Diplomatarium Norvegicum, III 326)

¹ GEGN.2/2025/9/CRP.9 emphasizes the need for comprehensive digital documentation systems. However, the Handbook's implementation narrows acceptable evidence compared to the comprehensive approach recommended in the example laws given in chapter 3, § 7 in Appendix 1 of GEGN.2/2025/9/CRP.9.

1391	a Fresium	(Diplomatarium Norvegicum, I 390)
c.1400	Fresium	(Røde bok land register, 194)
1555	Fressie	(Diplomatarium Norvegicum, IV 105)
1593	Fresse	(Land register, National Archives)
1604	Fridzø	(Land register, National Archives)
1605	Friitzø	(Land register, National Archives)
1838	Fritsø	(Cadastre) ²
1886	Fresje	(Cadastre)
1907	['fres:jə] ³	(Norske Gaardnavne, vol. 6, p. 217)
1950	Fresje	(Cadastral draft)
2016	Fritsø	(Norwegian Mapping Agency, SSR)
2024	Fresje	(Norwegian Mapping Agency, Cadastre)
2024	Fritsø	(Norwegian Mapping Agency, SSR)

This case highlights a discrepancy between legal requirements and current standardization practice. The historical documentation reveals two main developmental lines: the *Fresi-/Frese-/Fresje-* line, which uniformly occur from 1380-1593 and again from 1886 to the present in the official Norwegian Cadastre (Matrikkel), and the *Frits-/Fritz-* line, which appears later from 1604 to 1838, but which is currently the only standardized form and in the national Norwegian geographical names database, Sentralt stedsnavnregister (SSR).

The documented local pronunciation from 1907, ['fres:jə], provides crucial evidence, as it aligns with both the medieval forms and the current official cadastral spelling *Fresje Nordre* and *Fresje Søndre*. This creates a complete documentation chain from medieval times to present, showing consistency between the earliest written forms (*Fresium*), the recorded local inherited pronunciation (['fres:jə]), and the current cadastral form.

The current situation, where two parallel forms exist, the standardized *Fritsø*, in the national geographical names database (SSR) and the unstandardized, *Fresje*, in the official Norwegian Cadastre (Matrikkel)), creates exactly the kind of inconsistency that the Place Name Act aims to prevent. The SSR form *Fritsø* appears problematic from both legal and administrative perspectives as it does not reflect the documented local inherited pronunciation but rather represents a later spelling tradition. It diverges from the property register and does not follow the principle of using the most historically documented form.

According to the law's primary requirement of basing standardization on inherited local pronunciation (den nedervde lokale uttalen), *Fresje* is formally the legally correct standardized form. This form not only reflects the documented local pronunciation, it has the longest documented tradition, follows regular Norwegian spelling conventions, and maintains consistency with the current property register usage.

The case demonstrates how current standardization practices deviate from the law's requirements. The *Fritsø* form cannot be justified under §4 of the Place Name Act as it neither reflects documented local pronunciation nor can claim to be "vel kjend og innarbeidd" (well-known and established) when parallel forms exist in official use. This situation,

² The full cadastral forms were *nordre* (northern) and *søndre* (southern) added to the end of the name, being subdivisions of an older unit, i.e. *Fresje nordre*.

³ The original phonetic transcription was in the national phonetic script *Norvegia* which has been converted to IPA for ease of reading for an international audience, cf. https://www.nb.no/items/URN:NBN:no-nb_digibok_2008010710001?page=234 for original *Norvegia* phonetic form.

unfortunately, is far from unique in the national Norwegian geographical names database (Sentralt stedsnavnregister (SSR)).

Based on the detailed documentation and analysis provided, several issues emerge regarding resource management at Statens kartverk. The maintained SSR form *Fritsø* fundamentally contradicts the documented historical evidence and legal requirements. The persistence of this form, despite clear documentation showing *Fresje* as the historically accurate and legally compliant form, suggests gaps in either the professional expertise applied to name standardization decisions or, more probably, in the resources allocated to standardization work.

The case reveals problematic aspects of current standardization practices which appear to disregard both the institution's own internal documentation, as well as historical documentation. Pronunciation and chronological records from 1380 onwards clearly demonstrate a preference for the *Fresje*- form, yet the agency maintains a spelling variant that emerged much later. This suggests either insufficient resources for thorough analysis or inadequate procedures for incorporating historical documentation into standardization decisions.

Concerning is also the apparent oversight of the documented local pronunciation ([ˈfr̥ɛsːjə]). This pronunciation record undermines the current SSR standardization, yet it seems to have been overlooked in the standardization process. This indicates potential structural issues in how linguistic evidence is evaluated and applied.

The maintenance of a form that contradicts pronunciation, historical documentation and the property register (Matrikkel) suggests problematic internal coordination within Statens kartverk itself, as it manages both registers. This points to potential organizational issues in how different departments within the agency coordinate their work. The example appears to indicate a need for:

- Enhanced professional expertise in historical linguistics and onomastics
- Better procedures for evaluating and applying historical documentation
- Improved coordination between different sections handling geographical names
- More resources for thorough research and documentation review
- External monitoring and quality control mechanisms in standardization decisions

The situation also suggests a need to review whether current staffing levels and expertise at Statens kartverk are sufficient to fulfill their legal obligations in geographical name standardization.

Example: Street Names reflecting inconsistent standardization

The coexistence of the street names [*Fritsøveien*](#) and [*Fresjestien*](#) reflects the same unfortunate dual naming pattern we see in the above *Fritsø/Fresje* geographical name example, but with an added layer of complexity due to municipal authority over street names.

The coexistence of street names *Fritsøveien* and *Fresjestien* in the village exemplifies a problematic dual naming pattern that mirrors the standardization issues seen in the *Fritsø/Fresje* case. While street naming falls under municipal jurisdiction, municipalities are still bound by the Place-Name Act, which mandates consistency in naming related features and requires that street names derived from geographical names follow standardized forms. This creates a complex situation where municipal autonomy intersects with national standardization requirements. The current situation shows how *Fresjestien* follows the historically documented pattern, matching both the documented local pronunciation and the official cadastre form while aligning with the oldest documented forms. In contrast, *Fritsøveien* follows the SSR standardized form, representing a later spelling variant with less substantial documentation.

The municipality's simultaneous use of both variants perpetuates the inconsistency that the Place-Name Act aims to prevent, potentially creating practical challenges for emergency services and navigation. While the municipality holds naming authority, the documentation strongly suggests that *Fresje-* would be the legally appropriate choice for standardizing all related street names, as it better reflects the documented local pronunciation, has stronger historical documentation, and maintains consistency with the property register. This highlights the need for more coordinated approaches to geographical name management across administrative levels.

This situation also lays bare a known challenge in national toponymic standardization: the tension between municipal autonomy in street naming and the need for consistent geographical name usage across different administrative levels. The coexistence of the street names *Fritsøveien* and *Fresjestien* in the same village reveals significant challenges regarding geographical name competencies at the municipal level.⁴ Through the lens of historical documentation available in Stadnamnportalen, this situation exposes gaps in how municipalities handle their geographical name responsibilities.

The documentation demonstrates that municipal administrators appear to lack sufficient understanding of historical name forms and their significance in contemporary naming practices. This is particularly evident in the case where they have overlooked the documented local pronunciation [ˈfresːjə] and its relationship to the historical forms. The creation of street names using two different base forms of the same name - *Fresje* and *Fritsø* - indicates issues in procedural practices within the municipal administration.

While street naming falls under municipal jurisdiction, the current situation suggests limited awareness of how municipal autonomy intersects with the Place-Name Act's fundamental principles. The Tønsberg municipality followed existing spelling forms in official databases. However, the result is that it has perpetuated an internally inconsistent naming pattern, seemingly by not systematic checking against actual standardized forms, historical documentation or consideration of the relationship between official cadastral forms and the National geographical name register, SSR. Unfortunately, this is not a single, unique occurrence, there are many other examples to cite.

Other cases

Of parallel cases, where street names do not follow standardized forms, are standardized farm name *Finskot* and smallholding name *Finnskutt* in Rakkestad, Østfold vs. the street name *Finskudtveien*. Again, we see a standardizing discrepancy in geographical names, however, here we also see a differing spelling for the street name itself. A further example from Rakkestad municipality shows that the standardized farm name *Sølskot/Søllskot* – with the un-standardized cadastral name form *Sølvskut* – reoccurs as part of the street name *Sølvskuttveien*. The cadastral form has been used as the guidance for the street name, but the existing name form has not been followed, merely used for inspiration.

This case appears to point to a general absence of strong name expertise in municipal administration. This is manifested in several ways: limited understanding of onomastic principles, insufficient attention to standardization requirements, and apparent lack of consultation with name experts. The situation also reveals gaps in the understanding of how property register forms relate to other official name forms, and how these impacts practical aspects of municipal administration. The above cases exemplify a broader challenge in Norwegian geographical standardization: while municipalities hold authority over street

⁴ This shows the need for available expertise at all decision making levels, as highlighted in GEGN.2/2025/11/CRP.11, Ch. 1 (p.2.), and efficient monitoring systems in place, Ch. 5 (p. 4), as well as in GEGN.2/2025/9/CRP.9, p. 4, and exemplified in e.g. Appendix 1, Ch. 8, § 17 (p. 12).

naming, they may lack the specialized knowledge needed to exercise this authority in accordance with both legal requirements and professional onomastic principles. The situation suggests a need for enhanced training and professional support for municipal administrators who handle geographical name matters, particularly in interpreting and applying historical documentation in contemporary naming decisions. However, the greatest need again seems to be external monitoring and review processes for standardization.

What is evident from scrutinization of the above cases, is the fact that documentation relies heavily, almost solely, on map sources and cadastral entries⁵. This means that the documentation of Statens kartverk is entirely self-institutional, referring either to current sources or earlier printed and electronic map series. While this is judged sufficient, and not against the handbook's (*Handbok for namnebehandling*) recommendations, this type of referencing is in danger of instigating circular referencing, where any mistakes will remain in the system, as they are not spotted in any review process. That municipalities also rely on the same paths of documentation, show that they must follow similar instructions.

It must be noted that historically it has been difficult to fault these administrations, as comprehensive and easily accessible documentation sources were not easily available prior to the launch of Stadnamnportalen in June 2024 (GEGN.2/2025/8/CRP.8). So, finding external sources would have been an arduous and time-consuming task. The result is, however, that the law and administrative implementation documents have not been followed. The result is that a gargantuan task of alleviating this situation lies ahead and cannot remain ignored if the Norwegian geographical names law, *Lov om stadnamn*, is to remain a credible and exemplary law.

4. The Missing Link: External Monitoring and Review Processes

The current challenges in geographical name standardization and management across standardization levels point to a critical need for systematic external monitoring and review processes (cf. GEGN.2/2025/11/CRP.11, ch.5 (p. 4)). While standardization bodies maintain internal procedures for name standardization, the documented inconsistencies show these are likely insufficient. A solution could lie in establishing formalized relationships with an external research institution where relevant expertise in onomastics, historical linguistics, and toponymy already exists. If such a body does not exist, provisions should be made for its implementation and sufficient funding of the body.

Such an arrangement could be structured as a two-tiered system. The first tier would involve regular audits of standardization decisions by expert panels consisting of research environments in Nordic linguistics and onomastics. These panels would review samples of standardization decisions, examining their compliance with both legal requirements and scientific principles of toponymy. The second tier would constitute a standing advisory committee of experts who could be consulted on complex cases and systematic issues identified through the audit process. This committee would also be responsible for developing and updating best-practice guidelines based on current research and documented challenges.

The implementation of such external monitoring would require formal agreements between Statens kartverk, municipalities, and the research institution – or regulation by the state. The agreements should specify review procedures, timelines, and feedback mechanisms. Regular reporting cycles would ensure that identified issues are addressed systematically, while also building a knowledge base of case studies and precedents. This would help create a more robust and consistent approach to name standardization across

⁵ C.f. GEGN.2/2025/7/CRP.7, p. 6, where the need for comprehensive documentation, also outside of the traditional sources are to be sought.

different administrative levels.

Critical to the success of this system would be the establishment of clear channels for knowledge transfer between experts and practitioners. This could include regular workshops where academic experts present relevant research findings and practitioners share practical challenges, creating a dialogue that enhances both practice and research. The system should also include mechanisms for emergency consultations on time-sensitive cases, ensuring that expertise is available when needed for urgent standardization decisions.

This external monitoring and review system would serve multiple purposes: it would provide quality assurance for standardization decisions, create opportunities for knowledge exchange between experts and practitioners, and help identify systemic issues that need addressing. Most importantly, it would help ensure that standardization decisions are based on sound scientific principles and thorough historical documentation, rather than administrative convenience or incomplete access to or understanding of the historical and linguistic evidence.

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Points for discussion

The Group of Experts is invited to:

- (1) Discuss how internal documentation practices in name standardization agencies may create self-referential systems that perpetuate errors and evaluate mechanisms for external documentation.
- (2) Examine the relationship between legal frameworks and administrative implementation documents in toponymic standardization.
- (3) Evaluate the role and structure of proposed external evidence-based monitoring systems for national naming authorities.
- (4) Review competency requirements and resource allocation in toponymic standardization, with particular attention to the challenges of coordinating standardization across different administrative levels.