

Heather Humphreys TD
Minister for Arts Heritage and Gaeltacht
Kildare Street
Dublin 2

20th Aug. 2015

RE: PROPOSED STAR WARS FILMING ON SKELLIG MICHAEL WORLD HERITAGE SITE, AND EUROPEAN SITE UNDER THE HABITATS DIRECTIVE, CO KERRY IN SEPTEMBER 2015

Dear Minister,

We request information on

- 1 The legal process by which a large scale Star Wars filming project on Skellig Michael is proposed to be accommodated in Mid-September.
2. The proposed management and mitigation of the range of potential adverse impacts on ecology and archaeology as well general site impact disturbance.

BACKGROUND TO THE ISSUES AND CONCERNS

An Taisce's concern is prompted by the major filming project which occurred on the island in August 2014 also for Star Wars. This project was facilitated in breach of long established conservation policy for the World Heritage Site

Existing levels of visitor activity are already at the level of or slightly in excess of what would be best for a site of this sensitivity, and even with current restrictions, wear and tear is visible. Therefore nothing unnecessary should be permitted, as is normal policy for the whole island, including the monastic remains.

Skellig Michael can't be regarded as a limitless economic resource. Any impact compromising its protection and violating its meaning in the world, as well as threatening its fabric, its ecology, and the unique combination of both which make up its essence, should not be permitted

It is not sufficiently understood, even among those who depend on tourism locally, that in order to protect Skellig for the future, it can never be regarded as a mass destination. Existing limitations on visitor numbers, activities, the places of access on the island, and the hours of access to the island are minimally necessary, and this was policy upheld and fully understood in management until the 2014 filming.

The precedent of permitting more boats to come to the island, or to allow existing permitted boats to make multiple trips in a day is also completely inappropriate for the same reasons, and because the normal tourist season coincides with the North Atlantic Seabird breeding season.

The Star Wars film project has no relevance to the monuments historical, cultural and spiritual value, a place of such beauty and magnitude that it is recognised as a World Heritage Site of universal importance. The use of the Skellig location and monastic site for 'Star Wars' is not at all intrinsic or necessary to the film project itself. This is a departure from existing policy where only media productions of cultural, historical or scientific relevance were given very limited access and on a much smaller scale.

IMPACT ON ARCHAEOLOGY AND MONUMENT

The fragility of the historic remains cannot be over emphasized .The monastic site on Skellig is old and vulnerable, originally constructed on artificially terraced ground using medieval engineering and building techniques. Modern repair and conservation works have partially obscured the real antiquity, and some of the fragility of what remains. But it is recorded that the entire site has been subject to major subsidence, collapse of retaining walls, some insecure older repairs. Also none of it was ever intended for the human numbers and the levels of activity already occurring during the summer season. All the structures but one is of drystone construction, in friable old red sandstone, along with all flagstone steps and terraces. It is not so immediately obvious to those unfamiliar with the site that this involves not just extraordinary beauty, value and presence, but that the site is very fragile.

IMPACT ON BIRD LIFE

Given approximate dates for the proposed filming this year, mid -September, there will still be considerable numbers of the two priority- listed bird species on the island, Manx Shearwaters and Storm- Petrels.

Bird observation information raises the following concerns:

1. Manx Shearwaters

At present there are Manx Shearwater chicks at various stages of development on the floors in the corners of 4 of the monastic buildings. These have been protected with netting that obscures them and shields them, and they are closely monitored while visitors are present, but the average time for visitor activity each day which stretches over approximately 4-5 hours is already at the limit of acceptable disruption for these nests.

At least some will still be present, or at the point of fledging during the proposed time for filming and filming preparation. There will be a similar proportion of chicks present among the greater number of Shearwater nests under the soil behind the monastery, in the monks' garden, in Christ's Valley between the two peaks of the island, and under soil adjacent to the steps on the slopes of the island. (Visitors are always asked to stay on the paths and not allowed into the nesting areas behind the monastery.)

Some just - fledged chicks are always found exposed in different parts of the monastery and the rest of the island up to mid-September - as they seem either to wander a little before

leaving or return close to their nest sites for a few days - and are very vulnerable to predators, which is exacerbated when there is a lot of human activity in adjacent locations. Shearwaters are also very vulnerable when on land because they are not built for moving quickly on ordinary flat or uneven ground etc. At fledging time which is at its peak in late August - mid September it is common to find exposed young birds which are put in safe places until nightfall, when they are more enabled to get away or to safety themselves.

2. Storm- Petrels

Many of the island's Storm Petrels have chicks at a very young stage in late August, and there are still some chicks present and at the point of fledging up the end of September. Out of an average group of ten, among the dozens of nests close to the staff and visitor accommodation in the sea wall on the lighthouse road, approx.. 2 of 10 chicks will still be present later in September. Petrels nest in large numbers in all the drystone monastic steps which are climbed by everyone going to the monastery each day, and there are also many dozens of petrel nests in all the drystone structures of the monastery. In late September the same proportion of their young will still be present in all these locations. On an average half-hour walk down from the monastery at dusk in late September one will encounter at least a dozen birds at a time, indicating bigger numbers still present in the steps, and under stones in all parts of the island.

In mid- August last year a petrel chick a few days old, apparently still blind, wandered from its nest in the lower steps during the day. This was during the period after the filming when boatmen were granted extra trips each day, so human activity on the steps went on all day. This chick may have been disturbed by all the extra activity, or its parents may have been deflected from the nest and stayed away too long because of all the extra activity on the steps, and would not have survived,

There was a nest for a Leach's Petrel under the steps in the heart of Christ's Valley last year. Christ's Valley was the main location for the filming activity. This nest has not been re-occupied in 2015.

3. Other Birds

Other vulnerable birds still present in large numbers in mid- September includes Fulmars. Mid-September is also the time for sightings of rare birds in passage from elsewhere, including many songbirds from all over Northern Europe ; Lapland Longspur, Snow Bunting; Goldcrest, Immature Robins, Pied Flycatcher; Kestrel ; Corncrake have all been recorded on the island at this time.

All of above are indications of a globally important and vulnerable ecology, recognized in its high status and designation, having the highest level of legal protection under the Birds and Habitats Directives.

IMPACT OF FILMING

There is serious and potentially irreconcilable conflict between the conservation and management the site with the scale and activities of the proposed filming project as described below from last year and we understand proposed to be more extensive this year.

During the August 2014 filming, activities normally went on at different locations from first morning arrivals between 8 or 9a.m., until last departures approximately at 6 p.m., or later each day.

Set-up activities went on for a week before the actual filming. These included teams of workmen carrying equipment etc., extra personnel, extra cargo, extra heavy traffic on the drystone steps and fragile pathways of the island (more than normal), and not meeting the legal criteria laid down in Article 6 the EU Habitats Directive, for a project of urgent or unavoidable necessity, either for intrinsic structural or safety reasons.

During the filming the same teams were carrying equipment in these locations, including fragile Christ's Valley, the monastic steps, and the monastery itself. (In the case of the latter, mitigation confined most activity to the lower terrace of the monastery, the monk's garden, but this included a catering station with extensive food, equipment etc., which involved the presence of large numbers of people in and around the monastery all day.)

We note at least a week's filming activity, involving closure of the island for most or all of that period has been requested, as well as preparation and clean up times. This clearly involves a larger scale project than last year, and of possible longer duration, increasing all the inappropriate impacts and the overall gross threat involved.

It is uncertain that the unusually good weather which coincided with last year's project will happen again in September. If the project goes ahead while trying to contend with more adverse conditions, this will increase all the potential impacts everywhere on the island. As even for ordinary daily activity of working staff on the island, all logistics are difficult, cumbersome and more prolonged than they would be in other circumstances. Teams contending with bad conditions on the steps, in the monastery and around the island will have more impact, their cargoes will have more impact, their activities will be less predictable and harder to supervise, in addition to much greater safety risks.

One of the greatest threats from the filming activity as described involves the risk of accidentally bringing rats to the island with all the cargoes, including extensive food and catering. One of the reasons why Skellig is such an important habitat for all the birds already mentioned, and for all the others- puffins, razorbills, etc., is that rats are not present on the island and all these populations can thrive in a way they don't elsewhere. In 2014 all gear, food, tents, equipment were stored in a temporary base on farmland, close to barns and outbuildings near the harbour in Portmagee on the mainland. One of the most important protection measures agreed last year was the inspection of every load transported to the island to ensure no rats were being carried, and this was successful. But if weather conditions are adverse, this will be much harder to do and enforce.

In the absence of publically available information to date and advance of having confirmed information about what is planned this year, we would appreciate information on the following:

LEGAL STATUS

- 1 What is the legal and consent status of the project?

- 2 What screening has been carried out with regard to potential requirement for Environmental Impact assessment?
- 3 What screening has been carried out for Appropriate Assessment under the Habitats Directive?

SITE IMPACT MITITIGATION

Without prejudice to the legal issues raised above, what mitigation measures and DAHG/NPWS supervisory measures are proposed to address the range of issues and concerns in this letter.

Yours Sincerely,

Ian Lumley

Built Environment Office
An Taisce – The National Trust for Ireland