An Taisce
The National Trust for Ireland

Skellig Michael Management Plan
Department of Culture, Heritage and the Gaeltacht
The Custom House
Dublin 1
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Sent via email to: skelligmanagementplan@chg.gov.ie

8th February 2019

Re. Public consultation on Skellig Michael World Heritage Site Management Plan 2019-2029 to replace the previous 10 year Management Plan dating from 2008

An Taisce welcomes the opportunity to make the following comments on the December 2018 Skellig Michael World Heritage Site Management Plan 2019-2029.

PRELIMINARY LEGAL ISSUE

Screening is required for Strategic Environmental Assessment (SEA) and Appropriate Assessment under the Habitats Directive as a preliminary matter. No information has been provided in the consultation call as to how this is to be carried out.

INADEQUACY OF CONSULTATION PROCESS PROVIDED

The process of seeking pre-Draft Plan consultation on the formulation for a further decade of the Management Plan for one of the State's two World Heritage Sites is welcome. However the manner in which the process has been initiated does not reflect the serious engagement with public, stakeholder and NGOs, that meaningful consultation requires.

The undertaking of any pre Draft consultation on a new plan should provide information on the outcome of the previous plan. The 2008 WHS Management Plan contained 67 Actions. An essential preliminary action in any consultation is a plan review to provide oversight of the achievement of the previous plan actions and identification of areas in which actions have not been met. In this case it would be expected that the consultation call would provide a performance review of the 2008 WHS plan in relation climate, physical conservation of the monument and associate features, ecology, visitor impact, safety and capacity, and promotion and marketing.

In the case of a number of the actions, particularly those related to monitoring climate and bird population and visitor impact, the data provided will be an important consideration in the future management of the site and any interventions needed.

The framing of this consultation is inadequate on the following grounds:

- The consultation does not address the provisions of the Aarhus Convention in engagement of the public and NGOs in providing environmental information and facilitating a meaningful consultation and public participation process;

- The consultation is poorly advertised and is not even listed on the main Department of Culture, Heritage and the Gaeltacht (DCHG) website under "consultations;"

- The consultation document is just a single page giving a link to the 2008 WHS Management Plan;

- There is no Issues Paper to frame the consultation process;

- There is no evaluation or data on the performance of the 67 specific actions in the 2008 plan;

- There is no monitoring data provided including essential basic information on visitor numbers and bird counts over the last decade;

- There is no information on how the screening process for Strategic Environmental Assessment (SEA) or Appropriate Assessment (AA) will be carried out ;

- These issues should be addressed and resolved before the consultation process proceeds with the publication of a Draft Plan

It is recommended that when the Draft Plan Skellig World Heritage Site Management Plan for 2019-2029 is ready for public consultation, that it be subject to wide public advertisement.

The Draft should to be accompanied by supporting information containing the monitoring data required in a number the Actions in the 2008 WHS Management Plan, including climate, ecology and visitor impact.

OVERARCHING ISSUES FOR EVALUATING A 2019-2029 PLAN

1. DEFINING THE HERITAGE AND CULTURAL SIGNIFICANCE OF SKELLIG

An Taisce is pleased to note that the spiritual significance of the Skellig has been highlighted by Heritage Minister Josepha Madigan in launching the public consultation process: "*Of all our wonderful archaeological monuments, Sceillg Mhichíl sits at the highest level in terms of its visibility and prominence, rising majestically from the ocean and filling us with a sense of wonder at its natural beauty and historic isolation and spiritualism*.

The Skellig is one of the iconic images and representations of Ireland, but on top of this it is a site which has a deeper resonance. After his 1910 visit George Bernard Shaw's described the experience:

> "*The most fantastic and impossible rock in the world: Skellig Michael… …An incredible, impossible, mad place…I tell you the thing does not belong to any world that you and I have lived and worked in: it is part of our dream world."*

The international significance of the Skellig as part the history of early Christian monasticism is the basis for the World Heritage Site inscription. Although the full text of the inscription is cited. This is not adequately reflected in the content of the 2008 plan.

"*The Committee decided to inscribe the nominated property on the basis of cultural criteria (iii) and (iv) considering that the site is of outstanding universal value being an exceptional, and in many respects unique, example of an early religious settlement deliberately sited on a pyramidal rock in the ocean, preserved because of a remarkable environment. It illustrates, as no other site can, the extremes of a Christian monasticism characterizing much of North Africa, the Near East and Europe."*

Chapter 3 of the 2008 WHS Management Plan for Skellig Michael refers to the World Heritage Scheduling of Skellig because of the "*outstanding universal value from the historical (and) aesthetic... point of view.*" It is also described as "*an exceptional testimony to a civilisation that has disappeared*." This chapter also describes the distinctive value of the island, an extra "*intangible value*" felt and understood by most visitors as something utterly precious and unique and having "*cultural and/or natural significance which is so exceptional as to transcend national boundaries and to be of common importance for present and future generations of all humanity*".

The review of the Management Plan gives the opportunity to provide enhanced consideration of the international context and significance of Skellig in the story of monasticism across Europe, North Africa and the Middle East. Diarmaid MacCullough, in his authoritative "A History of Christianity" (2009), refers to the Skellig monastery:

> "*Spiritually, Celtic monastic life was as intense as anything in the deserts of Egypt or the Middle East. Half-starved monks crouched against the gales high in the rocky cliffs of the Skellig Islands, and the terrifying beauty of the waters made them see the sun dance for joy over the Atlantic Ocean, as it celebrated the Lord's resurrection on Easter Day.*"

The Skellig also belongs to an international group of Archangel Michael sites, including Mont Saint Michel in Normandy and St Michaels Mount in Cornwall; the Sacra of San Miguel in Val de Susa northern Italy and the Sanctuary of Monte Sant'Angelo in the Gargano southern Italy; and Monastery of Symi in Greece.

This is a globally iconic place which needs to be respected, cherished and held in trust for the future. While the tourism promotion of the island is of major benefit to the local economy, this is subsidiary to the protection of the intrinsic identity and priceless, fragile nature of the island itself, and is something which should never be allowed to dominate.

This places a special onus on ensuring the conservation of both the physical fabric and historic remains of the site as part of the conservation of the island rock as whole but also recognizing and protecting its cultural value, as well as its ecology

2. PLANNING FOR INCREASED CLIMATE CHANGE IMPACT

Ireland is facing the increased impact of climate change with greater exposure to Atlantic storms and high wind conditions, requiring enhanced management and adaptation.

Actions 57 and 58 of the 2008 Plan provided for monitoring on climate impact on the island. Information on the resulting data is need to inform a Draft plan. This should establish if increased exposure to more regular storm conditions and high winds is affecting structures, steps and other features of the historic fabric or the soil conditions for plants and ground nesting birds. In areas in or adjacent to the visitor route the impact of climate and weathering, as opposed to human footfall, should be determined.

Since 2012 and 2013 increased erosion was noted on Skellig Michael arising from intensified and more frequent severe weather, including violent winter storms followed by summer extremes of heat and increased rainfall. This caused loss of vegetation with subsequent serious soil loss and damage.

A review of future actions is needed to determine if mitigation measures are required. This should include a full risk analysis on the potential adverse impacts of any intervention, for example, to combat areas of soil erosion by propagating indigenous plant species from within the island.



Exposed Puffin nest entrance at the side of the monastic steps and tourist route including fragile soil.

In 2016 and 2017 four rock fall incidents occurred on the island causing damage to the 19th century lighthouse road. The more serious incidents resulted in closure to visitors and the undertaking of remedial work.



Unstable hillside above the lighthouse road (used by all visitors and traffic). It was the site of a major rock fall in 2016, which affected a major part of the road. The extensive repair works are visible in the lower right where the timber canopy over the road has been extended with new planks of a paler colour. Autumn 2016.

4. PHYSICAL CONDITION OF MONASTIC SITE, STEPS & OTHER STRUCTURES

Works to the monument features on the site come under the provisions of the National Monuments Acts. Major conservation and remedial work, including significant intervention on outer walls, was carried out to the monastic structures, enclosure, and hermitage in addition to archaeological works done before the 2008 plan period.

The 2008 plan did not envisage or propose any significant further interventions or actions. The condition of the earlier abandoned lighthouse structure and buildings was identified as a conservation issue.

Assessment is required to determine any impacts on the physical condition and maintenance of the monastic and later features that may have occurred over the last decade. Particular concern arises in the condition the visitor route steps from the combination of visitor footfall and soil erosion, including cracking of steps.



Stones loosened and broken in the steps from normal current traffic.
Since 2015, there is increased incidence of stones in the steps actually fracturing (like the one in the image) under pressure in addition to coming loose. Autumn 2016.

5. TERRESTRIAL, MARINE AND AVIAN ECOLOGY

While the WHS designation does not relate to or include the ecological significance of Skellig Michael and Little Skellig as bird habitats, natural heritage protection correctly forms an integral and significant part of the existing 2008 WHS Management Plan.

The site comes under the protection of the EU Birds and Habitats Directive as:

- A Special Area of Conservation
- A Special Protection Area

The 2008 plan references the requirement under the EU Birds and Habitats Directive to have in place management plans for Natura 2000 Site designations. However, there is no information as to whether the required management plans for the SPA or SAC have been put in place or implemented. Also raised in the 2008 WHS Management Plan is a projected extension of the marine SPA area. There is no information on the status of this.

The site also comes under national legal protections as:

- A Statutory Nature Reserve
- A Natural Heritage Area

As one of the most important natural sites under Irish State ownership, the ecological protection of the Skellig and Little Skellig and the protection of the marine feed source for the bird populations and marine mammals, including the Skellig seal population, needs to be exemplary.

The existing designations for the legal protection of the site are outlined in the 2008 Management Plan. They are intended to ensure the following:

(a) "*Proper management of the island would not be precluded by any interest or any other person in or over the said land for the purpose of conserving the said habitat…*" (Wildlife Act 1979/2000);

(b) "*That development likely to have serious adverse effects on the areas listed will not normally be permitted…*" (Planning and Development acts 2000-2006, Planning and Development Regulations 2001, Kerry County Development Plan);

(c) Objective: "*To maintain the conservation value of those sites selected as SPAs*" (as at b. above);

(d) Objective: "*To ensure that any development proposal in the vicinity of or affecting in any way a designated Special Area of Conservation (SAC), Special Protection Area (SPA), or Natural Heritage Area (NHA), provides sufficient information, showing how its proposals will impact on the habitat, and also indicating appropriate amelioration*." (as at b. above);

(e) The EU Birds Directive, supported by the Habitats Directive, "*requires an appropriate assessment of any works, plans, or projects.*" There is a list of notifiable activities which must be restricted. These are supplied in Appendix 6 of the Management Plan

(pg. 108) and include "*developing, operating, or allowing leisure or sporting activities liable to cause significant disturbance to those birds listed or their habitats*" and "*any activity that destroys habitat, except normal maintenance activities as defined in approved plans*."

Actions 17 to 19 of the 2008 WHS Management Plan required the compilation of bird data. Similarly, Action 20 required a vegetation survey. Review of this data is need to determine if any changes have occurred including:

- Numbers or location of ground nesting birds and other sea birds has occurred,
- Loss of vegetation or arrival of potentially invasive species
- Visitor interface with bird nesting and feeding areas

60 Puffin nests are immediately adjacent to or under the monastic steps and exposed to all daily human traffic, with hundreds more immediately nearby and similarly exposed. In all of these areas adult birds are attempting to access and exit burrows as well as adequately feed and care for their young in the midst of any permitted human presence. This includes 180 visitors per day as well as all the island workers.
While the Puffins are the best known and most photographed birds on the Skellig the populations of Manx Shearwater, Storm Petrel and Kittiwakes are also internationally important.

There is not yet sufficient monitoring and data in place to demonstrate impact or non-impact of any human activities on Storm Petrels on Skellig Michael. They are a priority species listed in the EU Birds Directive for vulnerability of nesting habitat. On Skellig Michael this habitat includes the 600+ drystone monastic steps which must be climbed by every person accessing the monastery or the upper parts of the island every day of the season. Petrels also nest in the walls of the monastic buildings (inside and out) in other walls, under stones and structures around the island, and are present in nesting sites from May/June to October. Fledglings are found wandering underfoot each day on the floors of the monastic buildings in the last weeks of the season. The eggs are approximately 15mm long and tucked into hidden spaces under steps and in walls on all the tourist routes, a fact not clearly understood outside the island as the adult birds are mostly visible at night.



staircase for visitors access has Puffin nests within and beside it as well as many Petrel nests within.



North Atlantic Puffins nest on Skellig in numbers over 10,000 at present. This species is on the International Union for the Conservation of Nature (IUCN) Red List since 2016 as they are starving and dying in many of their other breeding colonies.

Overfishing is threatening the entire marine feeding chain as well as the nutrients on which marine mammals and sea birds depend. Combined with this is the rising threat of ocean acidification though increased carbon dioxide emissions affecting the absorption capacity of the oceans. Therefore the marine feed source for Skellig Michael's bird populations are threatened. Skellig's Puffins, and other birds sharing the same food source, have faced intermittent feed source issues in the first decade of this century in two seasons before 2009.

There are reports of island workers and visitors watching adult birds bringing in Pipefish, which have no nutritional value, because of inability to find other food sources. The young of several species were seen struggling to eat these, often choking and lying dead on their nests or leaving weakened fledglings, in much-reduced numbers, trying to make their way to the sea where it was obvious they would not survive. Although the situation recovered spontaneously after 2009 the cause remains unknown.

Variability in population and migratory patterns of species of all kinds has always occurred, but now the human caused impact of climate change, ocean acidification, and overfishing is mounting, with increasing cumulative and overlapping impacts.

A key requirement for Ireland is to designate large scale Marine Protected Areas (MPAs) under the EU Marine Strategy Framework Directive. These areas are primarily for the conservation of fish species but will have the parallel benefit of protecting sea bird and marine mammal feed sources. An Taisce made a submission to the Department of Housing Planning and Local Government, including detailed recommendations, on this issue for the Marine Spatial Planning Framework consultation in December 2018.

http://www.antaisce.org/articles/national-marine-planning-framework-baseline-report

6. VISITOR MANAGEMENT, PROMOTION, AND MARKETING

The promotion and publicising of the Skellig needs to be based on the reason for the World Heritage Site inscription as well as the ecological and visitor constraints of the site.

It is important that communications and publicity on the site do not generate expectations of visitor demand that cannot be met and that will create disappointment. Publicity in relation to the Skellig should reflect the weather-based seasonal limit on access, the physical nature of the site, and the fragility of the historic features and ecology. This is an issue relevant to other sensitive sites across the world.

Equally, potential visitors need to be aware that visiting the site is unsuitable for young children and challenging for those not experienced in steep assents or who may be prone to vertigo. In 2009 there were two fatal accidents on Skellig Michael. Medical emergencies have arisen on an occasional basis in most years. It needs to be communicated to potential visitors that Skellig is a remote, exposed, and dangerous location of increasing fragility.

The 2008 Skellig Michael Management Plan refers to the impact of visitor numbers on the island, which were monitored over the previous decade. The average number of visitors per season between 1995 and 2018 was calculated at 11,100. This figure was deemed sustainable for the protection of the island, the monument features, and the ecology as well as safety considerations. This was also the information presented to the World Heritage Site Secretariat in Paris as representing the basis for managing visitor numbers This led to an agreed plan to limit the daily number of visitors with a permit system for boats landing visitors on the island.

The 2008 plan provided that the maximum desirable number of visitors per day needed to be capped at 180, and that, allowing for variables of sea conditions and peak versus low season numbers, this should not exceed a full total of approximately 11,100 visitors per season, a number which "*is deemed sustainable in terms of protection of the National Monument.*" The visitor boat permit system therefore allows a maximum of 15 visitor boats each carrying 12 passengers and making one landing per day.

Seasonal trend information, which has passed into public realm through media information requests, shows that until 2015, boats coming to the island were not always full except in July and August at the peak of the season. In the summers of 2016 and 2017, following promotion of Skellig in the first Irish located *Star Wars* film, boats were booked to capacity from the beginning of the season in mid-May until the end of September. This caused an increase in the numbers landing to more than 14,600 in 2016 and more than 16,700 in 2017 and 2018, despite much bad weather in 2017. Therefore annual figures are 50% in excess of the appropriate sustainable numbers of approximately 11,100 outlined in the Management Plan. This has implications for human trampling and erosion on the steps and adjoining soils, in particular.

In the competition for landing permits in 2017, two external business consortia operating larger more powerful boats were successful to the exclusion of smaller long-standing local operators, contradicting expressed intentions to bring benefits to small businesses in the area.

Moreover, an investigation of daily visitors actually landing on the island shows that those wishing to access the island for reasons of its own heritage now often have difficulty and are excluded by those who are visiting to experience the film location.

There is no justification for any increase of the current cap of 180 visitors per day though the boat licencing system. However, an important consideration is to provide for the staggering of visitor arrivals and departures to avoid congestion as well as to enhance both safety and the visitor experience.

The major 50% increase overall annual visitors from average 11,100 in 1995 to 2008 period to 16,700 visitors in 2017 and 2018 was not projected in the WHS 2008 plan. This has multiple implications. A review is now required to assess the impact of this increase in visitor numbers on all issues affecting the island.

It is submitted that the single most important issue for the new WHS plan will be to determine sustainable visitor numbers. Justification is required for any increase on the 1995 to 2008 average of 11,100.

7. INCREASED BOAT CRUISES AROUND ISLAND

The increase in non-landing boat cruises around the Skelligs was not an issue assessed or considered in the 2008 WHS plan.

40 different boat operators applied in the competition for permits to bring visitors to Skellig Michael in spring 2017. This was on the wave of publicity generated from Star Wars filming by Government and tourism organisations in spite of or in denial of the known fragilities and visitor number restrictions. Many of the boat operators who were not successful in getting landing permits are now operating "cruises" which sail daily around Skellig without landing, carrying hundreds of visitors. This includes those desiring to access the island itself but not able to as advanced internet booking is now filling island landing places for the entire season.

These boats, along with landing craft, are powered by polluting diesel fume and exhaust spewing engines with a cumulative impact. This is a new and steeply rising phenomenon for which figures are not available.

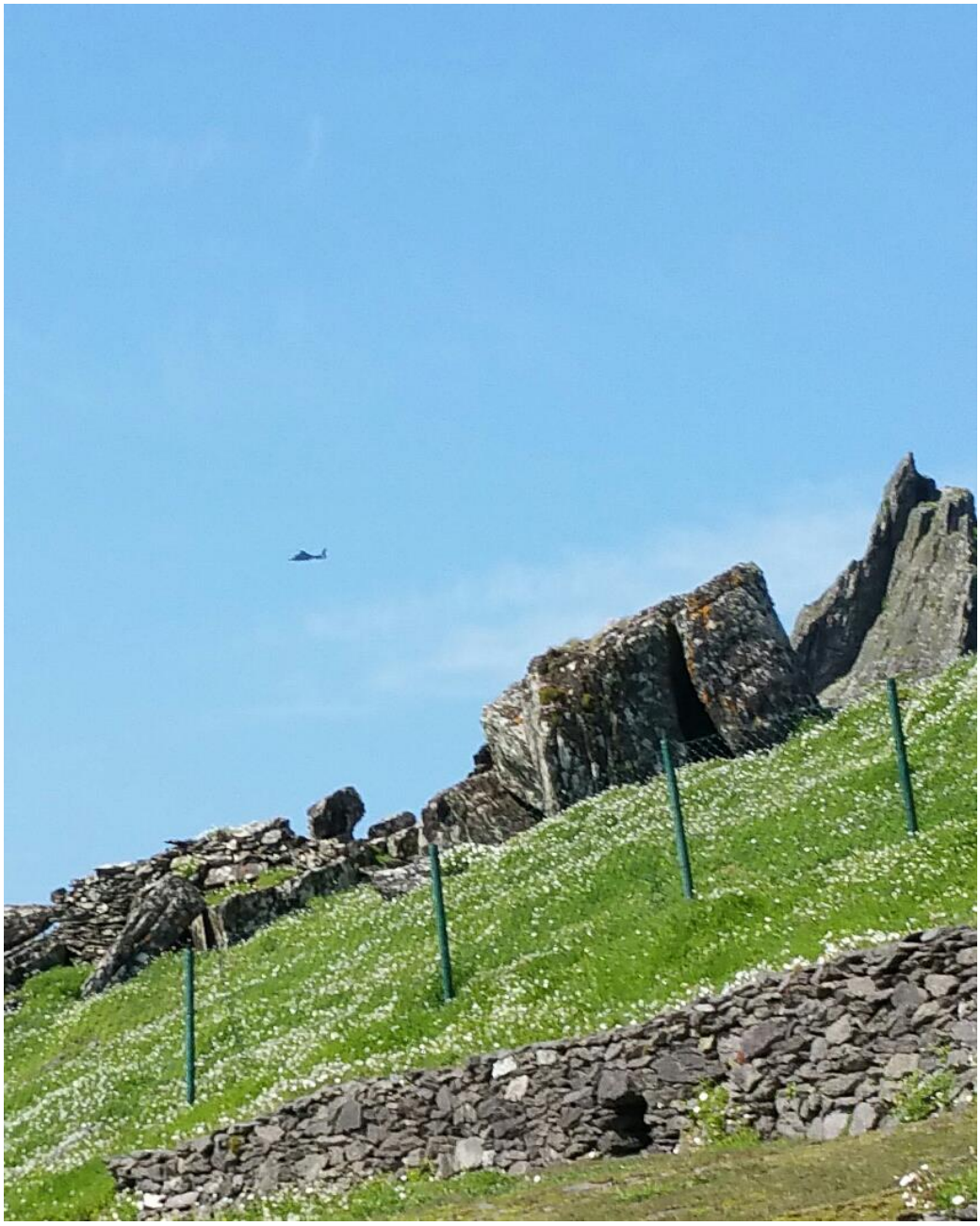
The impact of the continually increasing level of cruises coming close to and around the two Skelligs on avian ecology in particular needs to be assessed and regulated with regard to number of boats, emission standards and passing distances from Skellig Michael and Little Skellig.



Boat to Skellig Michael.

8. HELICOPTER TOURS OVER AND AROUND SKELLIG

A major new issue not covered or provided for in the 2008 WHS Management Plan is the promotion of helicopter tourism over and around the Skellig. The marketing is heavily based on experiencing the Skellig as a Star Wars location since 2017.



Helicopter tour over Skellig summer 2018

Helicopter tours are widely publicised in media with headings such as, "*Skellig Michael by Helicopter – A Galaxy not so far away - As Star Wars hits cinemas we take you for a Millennium Falcon view of the Skelligs*[1]*."*

[1] https://www.independent.ie/life/travel/ireland/skellig-michael-by-helicopter-a-galaxy-not-so-far-away-36407941.html

"*It's an expensive but awesome experience, courtesy of Naoise Barry of Irish-based Aerial Adventure[2], which mostly runs boat tours to the island, but also helicopter tours for those who can afford them – mostly rich Americans*."

No information is available on the regulation of helicopters circling or banking over the Skellig since 2017 or the number of craft involved.

There is clearly a potential impact on avian ecology that needs to be assessed. International Unions for The Conservation of Nature (IUCN) guidance advises on the restriction of helicopter tourism in National Parks and other areas of nature conservation or special sensitivity. The increased intrusion of helicopter tourism on the Cliffs of Moher and other locations in Ireland is also of concern.

The impact of helicopters on the Skellig is especially problematic as its special character is its spirituality and its setting is a place apart.

It is recommended that the new WHS Mangagment Plan define an exclusion zone to protect the peace and character of the Skellig, and to ensure that the droning of helicopter engines does not cut into the cries of the birds.



Promotional material for Skellig helicopter trips.

[2] http://aerialadventure.ie/adventures/skellig-dingle-adventure-by-air/

9. FILMING

For many years, Skellig has been featured both nationally and internationally in film and television documentaries, for which access had been appropriately facilitated, including the appropriately regulated use of helicopters. Kenneth Clarke's landmark documentary "Civilisation" (1969) prominently featured the Skellig in the first episode, *"By the Skin of Our Teeth*[3]*."*

The 2008 Spelling WHS Management Plan did not envisage filming of the scale and impact of State-approved 2014 and 2015 film location permits for *Star Wars* . Its was of an entirely different location impact and sensitivity to either documentary filming on the Skellig or the use of the Dingle peninsula for Ryan's Daughter

The continued use of Ireland as a location for international profile filming is both welcome and desirable in economic benefit and tourism promotion. Two films made in the mid-20th. C stand out for the manner in which they used the Irish landscape to superb effect and had a major ripple effect on tourism. These were John Ford's The Quiet Man (1952) filmed in Galway/Mayo and David Lean's Ryan's Daughter (1970) which gave an international profile to the dramatic coast of the Dingle peninsula. It is important, however, to note that in these films the landscape was a background to a bucolic Ireland of the 1950s in the case of the former, and the impending Anglo Irish conflict of the 1917 -1918 period for the latter.

Closer in comparison to the Star Wars franchise has been the more recent use by the Game of Thrones series of extensive locations in counties Antrim and Down including National Trust properties in conjunction with a Belfast studio facility. Apart for developing Northern Ireland as a base for filmmaking, this has created an active tourist trail. The filming of The Lord of the Rings in New Zealand had a similar impact.

The initial 2014 Disney-Lucasfilm use of Ireland for Star Wars location shooting focused entirely on the Skellig monastic island, thereby capturing its iconic imagery for a fantasy space series. The later episodes have used a range of Atlantic coast locations from Kerry to Malin Head. Had filming not targeted the Skellig monastic site and focused on instead building fantasy scenarios based around spectacular Irish Atlantic coastal setting as Lord of the Rings did in New Zealand or Game of Thrones in Antrim/Down there would be no issue of impact on Skellig. This would have been entirely appropriate for the promotion of "The Wild Atlantic Way

[3] https://www.youtube.com/watch?v=w6qYjisp51M

The STAR Wars Filming has raised widespread concern among those concerned with cultural integrity and heritage protection in Ireland both in physical impact on the site , and rebranding if its image:

- Photographs circulated in the public realm showed physical impact on the ecology and historic fabric on the island (See Appendix 1).

- The publicity and marketing of the film has generated visitor demand that causes expectations that cannot be met.

- It has brought about the effective rebranding of the island where the creation of the early Christian monastery is given equivalence to or made even subsidiary to the creation of the Star Wars brand theme site. Almost every media travel article reference to the Skellig and local tour guide experience now refers to the Disney Lucas franchise product.



Skellig Imagery used in Star Wars franchise product marketing.

Since the film the profile of the Skellig has caused it to widely rebranded and publicizedas the Star Wars island, an increasing amount of social media posting has arisen. Visitor experience of the monastery and other locations is now often shared with someone in *Star Wars* costume or brandishing plastic lightsabres or other merchandise associated with the film franchise.







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Costumed visitors in monastery and posing on boat .

The communication of the cultural, historical, and spiritual significance of the site, which is the basis of its WHS designation, needs to be re-emphasised. A moratorium on any further commercial filming is recommended

REGULATION OF DRONES

The widespread availability of drones has become a feature since 2008 Management Plan. The phottograph below indicates tourism promotion filming on Skellig in 2016



APPENDIX 1

DATA AND PHOTOGRAPHS ON THE 2014 AND 2015 STAR WARS FILMING ISSUE

Impact on monument structures and island ecology

The dry stone steps are part of the monument and of fragile construction vulnerable to heavy use.

The 2014 filming took place at the height of the bird nesting and fledgling feeding season on Skellig with all nesting birds still present. There were insufficient data available to prove or disprove impact afterwards, apart from the publicised destruction of 20 Kittiwake Chicks who were swept from their nests by a large helicopter in the weeks before the filming. Kittiwakes in other North Atlantic colonies are currently failing, and numbers of dead chicks were observed on Skellig nests in August 2017.

In September 2015 permission for filming was granted on the basis of an ecological survey which was submitted in August of that year and had no data for the weeks of the set-up and the filming itself.

Petrels have a fledgling season during which the young remaining longer in their nests than other species. There was evidence of immature Petrels present in nests underneath two of the main filming locations in 2015. The permissions documents do not clarify that the steps containing numerous Petrel nests, were subjected to intensive repeated heavy traffic, including carriers rushing with heavy loads for 12 hours each day over seven days. On normal tourist days visitors are only present on the steps for four to five hours.

In the summers of 2016 and 2017 the puffin nesting ground where Star Wars actor Mark Hamill stood for his scene in the first film was being trampled by fans who would not heed instructions to consider live nests and chicks hidden underground. This was subsequently fenced-off. The fencing itself is a hazard for birds accessing and leaving their nests and for airborne Petrels and Shearwaters at night.

In June 2016 a helicopter carrying journalists for promotion of tourism flew close over the island for an hour and inside restricted height limits. It was surrounded by hundreds of airborne Puffins, some Fulmars, Gulls, Falcons, Choughs, and Ravens.

In September 2016 a large eight-armed drone with eight rotating blades and a diameter more than a metre was permitted to fly close over the island slopes for more than an hour on two days for tourism promotional photography. It was accompanied for much of its flight by inquisitive fledgling protected Fulmars who were at risk in the air around it. It also caused some disturbance for the resident Falcons, Choughs, fledgling Herring Gulls, and Ravens.



New fence erected in Valley, August 2017 to protect Puffin and Shearwater habitats which were under main Star Wars film location and trampled by visitors 2016 and 2017. The fence itself is a serious hazard for all Puffins trying access and leave nests quickly in the Valley, making them more vulnerable to collisions and predators and potentially obstructing feeding of young. It is also very serious collision- hazard and obstruction for airborne Petrels and Shearwaters at night in the dark.



Puffins on their habitat in the Valley, which was the main location in the 2015 film and trampled by fans 2016 and 2017.



Trampled Puffin habitat and the 2017 Star Wars film location in Valley.

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Damage on the monastic steps near the top of Christ's Valley. These three steps sustained heavy damage during the 2015 Star Wars filming and now continually come undone. They are in a vulnerable and dangerous position at the turn at top of a steep flight.

The rate of regular wear and tear on the historic monastic steps and island paths also increased. In addition to pressures of erosion and human footfall, damage to the monastic steps, which occurred during set-up and filming in September 2015, has led to recurrent loosening. This created the need for repeated repairs in at least two locations with an overall

increased rate of constant step loosening and more repair required compared to previous years.

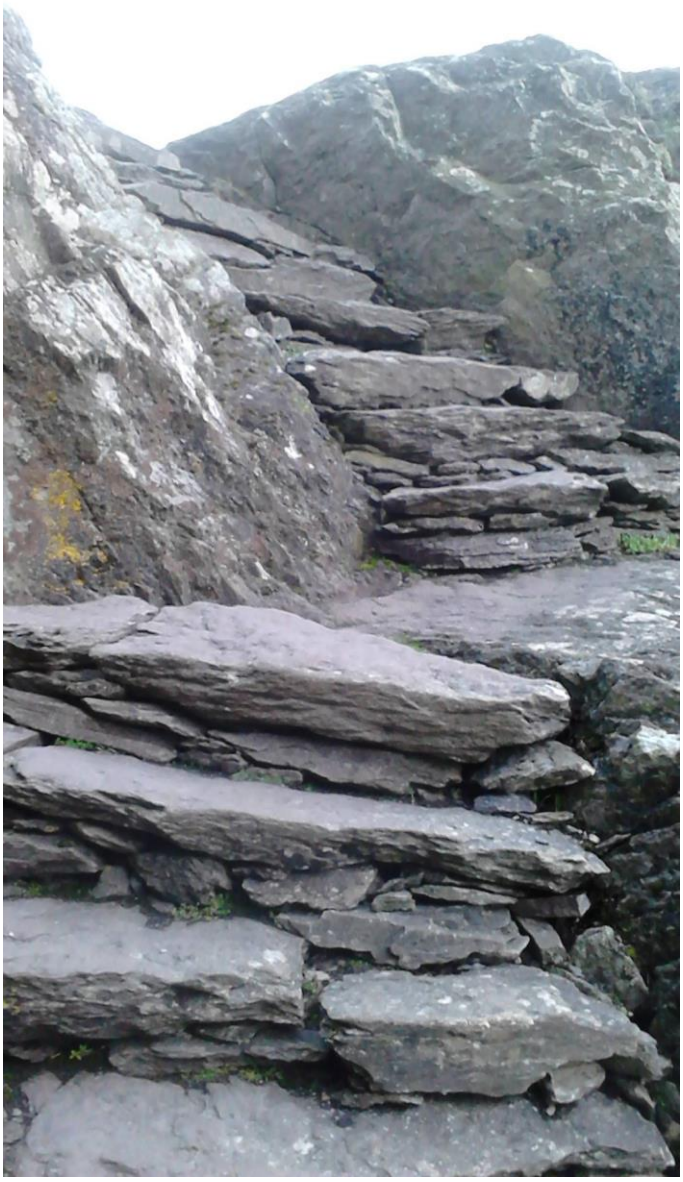


Damage on the monastic steps from daily traffic

The following four photos illustrate issues caused by the filming. The first three show repairs to steps immediately after the 2015 filming. They document areas that continually come loose now and have to be repaired fairly regularly.



Repairs to steps at the entrance to Christ's Valley after 2015 filming.
They were previously weak but are now permanently loosened.



Repairs to the steps at the top of the iconic steep flight in Christ's Valley after 2015 filming. They are now permanently loosened.



Repairs to steps close to lower filming location, 2015. They are now permanently loosened.



A helicopter over the monastery and habitats during the 2015 Star Wars film shoot.

Star Wars marketing and branding of Skellig

In a 2017 Failte Ireland Tourism Marketing Plan for the island (published in spring 2017 and available online), Skellig appears as a "Hero Product" to be economically exploited in various ways, primarily with reference to its new imposed identity as a set for the *Star Wars* films. Although this marketing plan repeatedly makes reference to the "monks' story," this is only in the broadest of terms, without any deep sense of this real context, and all the while consciously and deliberately positioning the island primarily in relation to the branding of the *Star Wars* global business franchise.

In July of 2017, the Head of Communications at Failte Ireland released public statements in which it is promised to "maximise leverage" from connection with the Disney-Lucas film brand with further plans "*to develop Skellig Michael and the surrounding area as a 'Star Wars'-themed destination*" (The London Times, 17th July 2017). It is further promised that in December of 2017, "*Tourism Ireland will launch a new campaign taking every opportunity to capitalise on the huge publicity around the film*."

There is little or no evidence of understanding or input in these plans relating to the real context of the island or its outstanding values other than a background for the *Star Wars* films.

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APPENDIX 2

PHOTOGRAPHS OF SOIL EROSION AND LOOSENING STONE ON STEPS

These photographs show the combined impact of weather and current daily traffic. They show an extreme location which exists in conditions of ongoing severe exposure to weather and climate, and dangerous for all visitors most of the time. They also show the historical remains, island fabric, and habitats in need of the utmost care and already in a highly vulnerable condition.



Soil erosion and vegetation loss on the lower steps (including Puffin and Petrel habitat), mostly weather-related, pre-Star WARS filming 2015.



Soil erosion beside the steps and in Puffin/Petral habitat. July 2016.



Minor rock fall and mudslide onto the lighthouse road after a heavy rainfall. Autumn 2016.



Soil erosion due to weather severity and traffic beside steps Autumn 2016.



Stones loosened in monastic steps from normal current traffic. Autumn 2016.



Dislodged stones in small terrace in the monastery. Autumn 2016.

APPENDIX 3

This following four photographs show the bird population habitat of Skellig Michael in the areas under and around the visitor access steps.



Puffin nesting under path. This is common across the island.



Exposed Puffin burrows beside path (perennial).

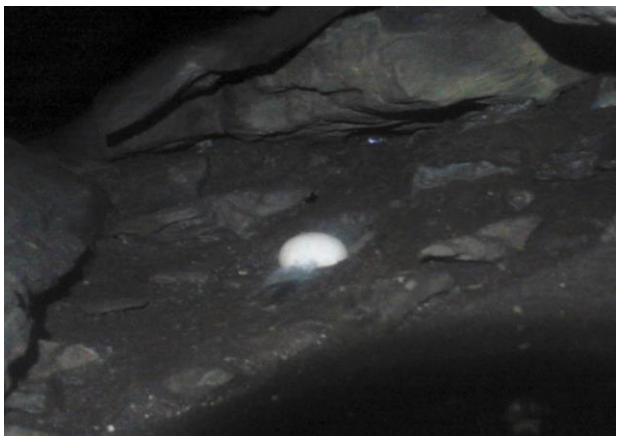


Adult Puffin accessing its nest under a flagstone in the path just outside the monastery (perennial).



Adult Puffin exiting another nest under flagstone in the path, just above Christ's Valley near the monastery. Petrel and Shearwater nests are also present in soil beside path (perennial).

Both petrels and Manx shearwaters nest within the stone crevice of the monastic site buildings. Manx Shearwaters are also priority-listed for vulnerability of nesting habitat in the EU Birds Directive. On Skellig Michael they nest on the floor in the corners of four monastic buildings in the main enclosure, under the soil in the garden of the historic monastery, and in similar locations all over the island from June to mid-September each year. In 2017, three out of four Manx Shearwater nests in the monastic cells failed before fledging, possibly due to the increased visitor traffic in the monastery.




Left: A petrel egg (15mm long) in a crevice in the interior of a monastic building. This nest has failed in 2015, 2016 and 2017. Right: A petrel chick approximately 3/4 weeks old, 6 - 8 cm long wandering near nest on floor in the interior of a monastic cell, daytime. September 2016 but perennial. This represents dozens of others under the steps and in the walls all over island at this time and hundreds in July/August.



A fledged Petrel chick caught out by daylight hiding in a crevice of an exterior monastic cell behind group of tourists listening to a talk. September 2017.



Shearwater Egg, approximately 5-6 cm long, in a monastic cell interior. August 2017. This nest was successful in 2015 but failed in 2016 and 2017.



Shearwater chick behind protective netting in the corner of a monastic cell. 2016 and perennial. This nest has survived each year in spite of exposure to visitors. It is the only one of four perennially within monastic cells that has not failed in 2017, with two failing out of four in 2016. There is extensive exposed Shearwater habitat under the soil all over the upper slopes of island, on the garden of the monastic enclosure and fenced off behind the monastery.