

# CONSULTATION

## Response Document



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**Consultation on the**  
**Skellig Michael World Heritage Site Management Plan**  
**Department of Culture, Heritage and the Gaeltacht**

**06 February 2019**

## Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), the leading membership organisation supporting professional ecologists and environmental managers in Ireland, the United Kingdom and abroad, welcomes the opportunity to participate in this consultation process.

CIEEM was established in 1991, received Chartered status in 2013, and has 5,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

Amongst others, CIEEM is a member of:

- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland
- Europarc Federation
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network
- The UK All Party Parliamentary Group on Biodiversity
- The UK Environmental Policy Forum
- Greener UK

CIEEM has approximately 250 members in Ireland who are drawn from across the private consultancy sector, NGOs, government and semi-state agencies, local authorities, academia and industry. They are practising ecologists and environmental managers, many of whom regularly provide input to and advice on land management for the benefit of protected species and biodiversity in general.

# Comments from CIEEM

CIEEM welcomes the opportunity to participate in the consultation process by the Department of Culture, Heritage and the Gaeltacht (DCHG) on the new 10-year Management Plan for Skellig Michael. We would like to make some considered comments, observations and recommendations for the new Plan, based on the existing Management Plan (2008-2018), as follows:

## 1. General Comments

- a. It is noted that, at 1.2 Purpose, the existing Plan (2008-2018) states: *“The plan aims to ensure that the site’s unique qualities and global significance are understood in order to conserve and safeguard the inherited cultural and historical assets”*. It is considered that the new Plan should also include a commitment to ensure that Skellig Michael’s natural heritage will be protected in accordance with national and international legislation.
- b. The existing Plan also states at 1.2: *“The plan will inform the day-to-day and long-term management of Skellig Michael. It will be a working document that is open to periodic review, with additions or amendments being made as conditions change”*. If this was the intention of the existing Plan, there is no evidence of additions or amendments during the 10 years of its implementation, nor is there any indication as to how this Plan will be brought forward, any updates, changes and/or improvements. This is particularly relevant to ecology and biodiversity as the potential impacts of the Plan and the overall management of Skellig Michael, including visitor numbers and impacts are changing and in particular in relation to recent filming and the resulting increased popularity of the area to foreign tourists. Visitor pressure is almost certainly a potential significant impact on Skellig Michael. It is considered that mechanisms for reviewing and updating the new 10-year Plan must be put in place from the outset.
- c. In the introduction to the description and history of Skellig Michael, at 2.1, the existing Plan refers to the important breeding sea bird colonies but makes no reference to the statutory nature conservation designations which apply to Skellig Michael, despite these being referred to later in Chapter 2, at 2,7. We consider that, in new Plan, these designations should be addressed from the outset. Also, that management prescriptions for the benefit of cultural heritage and tourism should not, and must not, prejudice the protection of the natural heritage as enshrined under national and international legislation.
- d. As the existing Plan was drawn up by OPW and DoEHLG, it is assumed that the new 10-year plan will be drawn up by the OPW (Department of Public Expenditure and Reform ( DPER)), DCCA and DCHG. It is suggested, as the Skelligs (including Skellig Michael) are now designated to include both islands (Great Skellig and Little Skellig) and the seas around both islands, that the Department of Agriculture, Food and the Marine should also be represented. It is further suggested that representation on the steering committee from the Department of Transport, Tourism and Sport would be useful, as

would early / ongoing engagement with select consultees such as BirdWatch Ireland (BWI), and CIEEM.

- e. In the existing Plan, at pages 28 and 52, Objective 4 of the Plan Action A13 refers, amongst others, to preparing and implementing a five-year conservation plan for the Skelligs SPA and that this would outline the main objectives for the conservation of the qualifying interests; it would also consider the management issues that may impact on the nature conservation features and delineate the strategies aimed at achieving the conservation objectives. Management strategies will be proposed to address these issues.

It is noted, however, that there is no conservation plan publicly available from NPWS website and the Natura 2000 standard data form states that there is no conservation plan for the Skelligs SPA. Overall there appears to be no integration of the ecological and nature conservation aspects of the Skelligs and the surrounding area in the Skellig Michael Management Plan. It is strongly recommended that the new Plan addresses these issues.

- f. Assessments of nature heritage issues are required, in order to address any issues in a scientific and meaningful way (ref. existing Plan, page 44 Natural Heritage issues).
- g. At page 39 of the existing Plan, Natural Heritage Management and Monitoring, it is unclear how the natural heritage aspects are currently assessed, documented and monitored. Census data are valuable for gathering information, however without knowing what potential impacts have been /are being assessed and monitored, the census data is only appropriate for certain information. When drafting and implementing the new Plan, a review of how monitoring relates to potential impacts and changes to conditions including additional climate change impacts and increasing visitor pressures on the nature conservation of the Skelligs is needed.
- h. The new Plan should include measures to ensure that the flora and fauna on the island are protected throughout the year, not just during the main visitor season.
- i. It is recommended that in Year 1 of the new Plan a remote camera (or similar device) should be installed to record the number of boats/individuals visiting the island outside of the principal tourist season. The management plan should have a protocol for ensuring that out of season visits do not adversely impact on the built and natural heritage.

## **2. Assessment under the EU Habitats Directive, Article 6**

- a. Compliance with National and European legislation (European Communities (Birds and Natural Habitats) Regulations 2011 and the Irish Wildlife Acts 1976-2012):
  - There is no evidence of an assessment of the Plan having been carried out in terms of Appropriate Assessment.
  - Ecological assessments should be carried out, not only in relation to Appropriate Assessment but also Ecological Impact Assessment (for those

species and habitats not designated features of a Natura 2000 site) of the potential impacts resulting from visitors, works and all management activities, over appropriate seasons and timescales. These assessments should apply to impacts, to the important species and habitats that may occur both within and outwith designated areas and should include those of the Nature Reserve, pNHA and the EU designated features (some of these may overlap).

- The assessments can then allow for an appropriate monitoring regime and to also identify remedies or actions that are required as a result of monitoring. These should all feed into the Plan. All of these should be documented records to be submitted to the relevant competent authority and also the Steering Group.
- b. Section 4.4.3; Page 38-39; There is a requirement for providing a clear evidence base for the following statement "The information on bird numbers on Skellig Michael, gathered since 1990, indicates that the works programme being undertaken by OPW has not impacted negatively on breeding bird colonies." As per Objective 4 of the existing management plan there was a requirement for screening for AA for the works and there was also ongoing monitoring of the bird species. The new Plan should reflect on any lessons learned during the existing Plan's period of implementation. A scientific review of the current status of the special conservation interests of the SPA should be presented as an Appendix along with details of the ecological monitoring carried out and links to previous screening (or appropriate assessments) of works carried out on the island.
- c. Page 52 Objective 4 of the Plan Action A16:  
There appears to have been no Appropriate Assessment for this Plan. The new Plan should be assessed in relation to AA, as referred to above, for any plan or project (either individually or in combination) likely to have a significant effect on the species and their habitats for which the SPA has been designated.
- d. AA screening statements for past and future proposed works should be published on the Skellig WHS website in accordance with good practice.

### **3. Protection of birds**

When drawing up the Plan for the next 10 years, it is recommended that the following should be given due consideration, ie. that:

- a. A full-time seabird warden should be present throughout the visitor season.
- b. The seabird survey should include all areas in the SPA including both islands and the seas around the islands.
- c. Breeding colonies of seabirds should be mapped on an annual basis with a register of failed and successful nests provided to NPWS. Any incidences of nests having been considered to have failed due to disturbance should be described.
- d. The use of drones /unmanned aerial vehicles (UAVs) within the SPA should be a discrete notifiable action.

#### 4. Visitor management

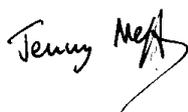
- a. Page 39 - 41 of the existing Plan, paragraph on Visitor Management and Sustainable Tourism. It is noted that the estimated visitor numbers are now outdated and require reviewing along with an assessment of the potential impacts of increased visitor pressures since the Skelligs have become an increasingly popular tourist attraction. This needs to take into account private boats along with the licenced boats servicing the islands. See also points below.
- b. As stated above, in Year 1 of the Plan a remote camera (or similar device) should be installed to record the number of boats/individuals visiting the island outside of the principal tourist season. The management plan should have a protocol for ensuring that out of season visits do not adversely impact on the built and natural heritage.
- c. In respect of Sustainable Tourism (Page 43 in the existing Plan), it is recommended that a Visitor Code of Conduct be developed and included as an integral part of the new Management Plan, to include:
  - Information to ensure that visitors (from all nationalities) are made aware of the sensitivity of the natural heritage of the site, including in relation to the protected status of natural heritage.

This may be best served at the boat departure locations as part of a visitor awareness programme/centre and should include a full appraisal of responsible tourism (along the lines of leave no trail initiatives) while also informing the sensitivities around bird nesting, habitat trampling etc. (simple example: explain that seabirds such as puffins may be nesting under steps so if you observe a bird that appears to be behaving oddly, ignore it and do not delay for photo opportunities).
  - Invasive species awareness (fauna and flora) should also be included.
  - In terms of medical/health & phobias such as height it is suggested that a pre-departure visitor awareness programme/centre might also provide an opportunity for potential visitors to be made aware of the terrain/steepness involved.
- d. Figures released by the OPW show that visitor numbers in 2018 far exceeded the sustainable cap set out in the existing Plan. It is suggested that the number of licensed vessels should be reviewed on an annual basis, as well as being subject to AA screening.
- e. The number of visitors on the island at any one time should be limited. Mass-landings or simultaneous departures should be avoided with visits staggered across the day. This may be best served by having a more centralised/controlled boat departure/landing slots amongst all boat operators.
- f. The number of visitors straying from the principal paths needs to be evaluated and if necessary additional measures to avoid additional disturbance to breeding seabirds and habitat damage should be implemented.

## 5. Predator and invasive species

- a. A mammal survey to ensure the continued absence of potential nest predators (e.g. Mink, Brown Rat) should be carried out in the first two years of the management plan. If, during the course of the management plan, that there are any confirmed sightings of such species on Great Skellig an appropriate eradication plan will need to be approved by NPWS and implemented as soon as practicable.
- b. A botanical survey should be undertaken in the first two years of the management plan to record the presence of any invasive plant species; and an appropriate eradication plan drawn up – as required. This would be subject to the approval of NPWS and should be implemented as soon as practicable.

CIEEM is the professional representative body of ecological practitioners and environmental managers who record and evaluate Irish biodiversity throughout their work, including within the context of land, habitat and species management. Our members are knowledgeable about the natural heritage of Ireland. CIEEM is therefore well placed to provide assistance, input and advice to the Department in respect of the development of ecological aspects of the Skellig Michael World Heritage Site Management Plan going forwards and would welcome the opportunity to review drafts of the Plan as they become available.



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**Chair, CIEEM Ireland Policy Working Group**

**06 February 2019**