

## NATIONAL MONUMENTS SERVICE

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# Sceilg Mhichíl World Heritage Property Management Plan 2020-2030

## Post Consultation Report

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P2349\_R5322\_Rev1 | June 2021

## DOCUMENT RELEASE FORM

### National Monuments Service

**P2349\_R5322\_Rev1**

Sceilg Mhichíl World Heritage Property Management Plan 2020-2030

Post Consultation Report

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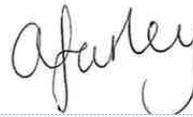
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Rev No	Date	Reason	Author	Checker	Authoriser
Rev 0	07/05/2021	Draft for client review	CC	JH	ALF
Rev 1	29/06/2021	Final	CC	JH	ALF

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## GLOSSARY

### AA

Appropriate Assessment

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### AOB

Apparently Occupied Burrow

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### DHLGH

Department of Housing, Local Government and Heritage

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### EAG

Expert Advisory Group

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### EPA

Environment Protection Agency

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### ER

Environmental Report

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### ICOMOS

International Council on Monuments and Sites

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### INNS

Invasive / Non-Native Species

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### IUCN

International Unions for The Conservation of Nature

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### MPA

Marine Protection Area

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### NIS

Natura Impact Statement

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### NMS

National Monuments Service

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### NPWS

National Parks and Wildlife Service

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### NTS

Non-Technical Summary

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### OPW

Office of Public Works

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### P/P

Plan or Project

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### SCI

Special Conservation Interest

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### SDG

Sustainable Development Goals

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### SEA

Strategic Environmental Assessment

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### SMIG

Skellig Michael Implementation Group

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### SPA

Special Protection Area

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### UAV

Unmanned Aerial Vehicle

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### UNESCO

United Nations Educational, Scientific and Cultural Organization

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### WHP

World Heritage Property

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### WHS

World Heritage Site

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# 1. INTRODUCTION

## 1.1 Purpose of this document

The Sceilg Mhichíl World Heritage Site Management Plan 2020-2030<sup>1</sup> (hereafter referred to as the 'Management Plan') has been prepared by the Department of Housing, Local Government & Heritage (DHLGH), in conjunction with the Office of Public Works (OPW), following an extensive consultation process. This plan will replace the current Management Plan that covers the period between 2008 – 2018.

In accordance with Article 9(1) of the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004, Strategic Environmental Assessment (SEA) has been carried out of the Management Plan and its findings are presented in an Environmental Report (ER). A Natura Impact Statement (NIS) has also been prepared in accordance with Part 5 of the European Communities (Birds and Natural Habitats) Regulations, 2011 (Statutory Instrument No. 477/2011).

This document has been prepared for the National Monuments Service (NMS), part of the DHLGH by Intertek Energy and Water Consultancy Services (Intertek). It is the Post Public Consultation Report for public consultation on the Management Plan and the accompanying SEA ER and NIS. The Management Plan, SEA ER and NIS were published on 4<sup>th</sup> November 2020 at the start of a six-week consultation period. This report presents a summary of the issues raised and comments received during the public consultation period. Where appropriate, responses to comments are included which provide technical clarifications. In addition, where applicable, changes to the Management Plan, SEA ER and or NIS as a result of the comments have been highlighted.

It is not intended to publish a revised version of the SEA ER. However, a post adoption SEA Statement, will be published following adoption of the Management Plan. This will describe how environmental considerations have been integrated into the Management Plan and how the Environmental Report and opinions expressed in response to the consultation have been taken into account in line with the requirements of the SEA Regulations.

## 1.2 Background

The aim of the Management Plan is to protect and preserve the World Heritage Site (WHS) of Sceilg Mhichíl, also known as Great Skellig. The plan provides information on the various aspects of the management policy for Sceilg Mhichíl, including conservation and presentation, visitor management, the legislative protections it enjoys and the development considerations necessary to protect the site into the future.

As part of the preparation of the Management Plan, DHLGH (the Responsible Authority) has carried out a SEA. The SEA has been undertaken in parallel with the revision of the Management Plan. The SEA fulfils the requirements under Article 9(1) of the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004. SEA is a systematic method for considering the likely environmental effects of a Plan or Project (P/P). SEA aims to:

- integrate environmental factors into P/P preparation and decision-making;
- improve P/P and enhance environmental protection;

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<sup>1</sup> NMS received advice from the International Council on Monuments and Sites (ICOMOS) in April 2021, to change World Heritage Site (WHS) to World Heritage Property (WHP) in the Management Plan. As such the Plan has been updated to use the term World Heritage Property. However, the environmental assessments in support of the SEA and AA on the Sceilg Mhichíl World Heritage Property Management Plan 2020-2030 have been largely developed prior to this date, therefore the term World Heritage Site has been retained within the supporting documents to these processes.

- increase public participation in decision making; and
- facilitate openness and transparency of decision-making.

In parallel with the preparation of the Management Plan and SEA, the Management Plan was screened for Appropriate Assessment (AA) under Part 5 of the European Communities (Birds and Natural Habitats) Regulations, 2011 (Statutory Instrument No. 477/2011). The assessment concluded that the Management Plan should be subject to AA. This was on account of one Natura 2000 Site being assessed as having the potential to be significantly affected by the Management Plan, the Skelligs Special Protection Area (SPA) (Intertek 2020). The National Parks and Wildlife Service (NPWS), in its capacity as an advisory body, reviewed the findings of the Screening for AA and agreed with the conclusions. As such it was determined that assessment of the plan should proceed to AA and a NIS be prepared.

### 1.3 Consultation process

Article 6 of the SEA Directive requires that both the environmental authorities and the public are given an “early and effective” opportunity to make submissions on a plan and the accompanying SEA ER before any final decision is made on the plan. On the 4<sup>th</sup> November 2020, notice of the public consultation was advertised in the Kerryman newspaper. The Management Plan and accompanying environmental reports were submitted by email to statutory consultees and other key stakeholders and made available for public comment on the World Heritage Ireland website (<https://www.worldheritageireland.ie/news/>). Consultation closed on 16<sup>th</sup> December 2020.

## 2. SUMMARY OF CONSULTATION FEEDBACK

### 2.1 Introduction

During the six-week consultation period, 13 observations were received. Seven observations were received from statutory consultees and other key stakeholders, namely: DHLGH, the Environment Protection Agency (EPA), An Taisce, Birdwatch Ireland, Fáilte Ireland, the Irish Cruising Club and the Irish Wildlife Trust. A further six observations were received from members of the public. Two observations (Irish Wildlife Trust and one public) did not require a response and have not been included in this report.

### 2.2 Consultation comments with responses

A summary of the observations received from the statutory consultees and key stakeholders and DHLGH response is provided in Table 1-1. A summary of the observations from members of the public and DHLGH response is provided in Table 1-2.

**Table 2-1 Consultee responses to the SEA ER, NIS and Management Plan**

Consultee	Summarised Comment	Response
An Taisce	The basis for the Sceilg Mhichíl World Heritage Site (WHS) inscription on Grounds of Universal Value should inform all aspects of the new Plan, the promotion and publicising of Sceilg Mhichíl as well as ecological and visitor constraints of the site.	This is already in the Management Plan and both the Management Plan, and the leaflets handed out to visitors emphasise the Outstanding Universal Value, the archaeological vulnerabilities of the site and the ecological aspects of the site. To strengthen this, the following sentence has been added to the Executive Summary of the Plan: <i>"The basis for the Sceilg Mhichíl World Heritage Site (WHS) inscription on Grounds of Universal Value informs all aspects of this new Plan, the promotion and publicising of Sceilg Mhichíl as well as ecological and visitor constraints of the site"</i> .
An Taisce	An essential preliminary action in formulating a new plan is to review and provide oversight of the achievements of the previous plan actions and areas in which actions have not been met. This is not properly provided for in the draft.	The Actions contained within the 2008 Management Plan were reviewed by NMS, NPWS and OPW in formulating the revised 2020-2030 plan. This review also included looking at recommendations in light of new legislation and improved best practice in relation to the conservation of heritage, both natural and built. Actions were also reviewed against the 2019 UNESCO Operational Guidelines which are updated regularly.  Where Actions have not been met or were partially successful this was discussed within a working group and informed the development of the Revised 2020-2030 Actions. An example of this is reflected in specific timelines for actions, which, on review, it was felt the earlier plan did not adequately commit to. New Actions were developed to reflect the objectives of the Plan and include greater focus for instance on monitoring. It is recognised that the 2008 Plan did not provide a mechanism by which implementation of Plan Actions could be monitored. The 2020-2030 Plan is committed to effective Action monitoring and a dedicated Action (A1.1) has been included to monitor implementation and effectiveness of the Plan Actions.  This information has now been included in the Management Plan in Chapter 1: Preparation of the Management Plan.
An Taisce	The Draft Plan does not properly address the 2007 UNESCO report which arose from concern about major conservation and remedial work, which was carried out before the 2008 plan period. UNESCO commissioned Tom Hassall to report on this work and he recommended that interventions be made explicit and should be published and the new additions should be clearly distinguished	The recommendations of the 2007 UNESCO Monitoring Report have informed the development of this revised Management Plan. Many of the recommendations were already implemented and remaining actions have been brought into the new Management Plan. A stratigraphic report on all archaeological interventions has been published and a procurement process to write this material up as an archaeological monograph will be issued in Q1 2021. A contract to write up the conservation interventions is in place for one year already. These will cover all interventions from 1978 to 2010. From the inception of

Consultee	Summarised Comment	Response
	from the old. The recommendations should be fully implemented, including publication of all works.	<p>this Plan a summary of all interventions will be published annually and there will be full publication at the end of each programme of intervention.</p> <p>The paragraph: <i>'The recommendations of the 2007 UNESCO Monitoring Report have informed the development of this revised Management Plan. Many of the recommendations were already implemented and remaining actions have been brought into the new Management Plan.'</i> has been added to the Management Plan in Chapter 1: Preparation of the Plan.</p>
An Taisce	The Draft plan does not provide for any change in the existing management of the site. Best international practice would advise that to complement the ongoing OPW and NPWS management of Skellig, a strategic oversight committee including independent international expertise should be established.	<p>The Management of the World Heritage Property is led by the State party, DHLGH with involvement of the Department's NMS and NPWS, alongside OPW. The existing management of the site is covered by the Management Team which consists of a Senior Archaeologist from the Department, the Senior Conservation Architect (OPW) who is the Site Manager, a Clerk of Works (OPW) and a representative of the Department's NPWS. This group is overseen by the Sceilg Mhichíl Implementation group which is composed of senior figures from the OPW and the Departments. They are also advised by an Expert Advisory Group (EAG) which consists of two archaeologists, a conservation architect and a wildlife expert. The EAG is independent and advise on publication and policy matters. All is of course overseen by the World Heritage Centre in Paris. When required the Department avails of external expertise, including UNESCO.</p>
An Taisce	<p>P50 of the Draft Plan references Failte Ireland's 'Skellig Coast Visitor Experience Development Plan' where the objective is to "protect the conservation value of the site" as a "core principle", while "harvesting it's value as a symbol of the Wild Atlantic brand that Failte Ireland has developed".</p> <p>It is important that communications and publicity on the site do not generate, as part of a Wild Atlantic Way touring route, expectations of visitor demand that cannot be met. 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.</p>	<p>The draft Plan provides detailed information on the fragility, dangers and limitations of access to the island e.g. see Sustainable Tourism and Visitor Management P49. The visitor information page on Skellig Michael on the World Heritage Ireland website explains the risks associated with the island and provides a link to a safe access guide available in multiple languages, which includes warnings in relation to the difficulties associated with accessing the island. Development of the mainland visitor centre (Action A7.8) commits to provision of appropriate advisory signage both on site (island and mainland) and online and will provide further opportunities to communicate with visitors, including, crucially, suggesting alternative heritage site options which are available to visit more easily nearby on the mainland.</p> <p>Action A7.8 has been updated in the Management Plan to the following: <i>"A7.8: Continue to ensure safe access to the island during the season by regular maintenance of the pier and steps during the official visitor season and ensure that appropriate signage is in place</i></p>

Consultee	Summarised Comment	Response
	Equally, potential visitors need to be aware that Skellig is a remote, exposed and dangerous location of increasing fragility.	<i>at the pier and at the steps to the South Peak and continue to maintain and improve up to date safety information available on-line."</i>
An Taisce	<p>The number of visitors per season deemed sustainable for the protection of the island and safety considerations was 11,100 and led to a daily cap of 180 visitors.</p> <p>Seasonal trend information shows that in 2016, 2017 and 2018 numbers landing were 50% in excess of this number.</p> <p>There is no justification for any increase of the current cap of 180 visitors per day. Consideration should be given to staggering of visitor arrivals and departures to avoid congestion and enhance safety and the visitor experience.</p> <p>It is submitted that the single most important issue for the new plan will be to determine sustainable visitor numbers. Justification is required for any increase on the 1995 to 2008 average of 11,100.</p>	<p>An analysis of the Visitor Carrying Capacity of the Monastic Enclosure on Skellig Michael was undertaken in 2013 and repeated again in 2019 by Creagh House Environmental Ltd on behalf of OPW. The findings recommended boat operators stagger arrival/departure times between the island opening times of 10:00 and 16:00 to reduce peak numbers arriving at the Monastery at any one time. This had already been put into effect over the last 2-3 years.</p> <p>Visitor numbers assessment of ecological impacts will be facilitated through the ongoing avian monitoring.</p> <p>The draft Plan includes Action 6.6: <i>"Continue to regularly review both the patterns of movement across the site and whether the 180 visitors per-day limit is sustainable, with regards to the cultural and natural heritage features of the site and to visitor safety."</i></p> <p>This action has been updated in the final Management Plan to include '180 visitors per day' to remove any ambiguity over what is meant by sustainable.</p>
An Taisce	Ireland is facing the increased impact of climate change with greater exposure to Atlantic storms and high wind conditions, requiring enhanced management and adaptation. While the draft plan references increased climate change impact, better emphasis should be placed on monitoring, and consideration of the potential need for mitigation measures.	<p>The final Management Plan has addressed the requirement for better emphasis on monitoring through the following Actions:</p> <p><i>A10.1 Develop a framework for monitoring climate change on the island</i></p> <p><i>A10.2 Ensure that any possible impact of climate change on Sceilg Mhichíl is monitored</i></p> <p><i>A10.3 Monitor the change of structures using technical assistance as required</i></p> <p>Climate change monitoring is a key focus of the new Management Plan in recognition of the increasing impacts it may have on the heritage of Skellig. Conservation issues are being exacerbated by increased rainfall and monitoring by the Discovery Programme is assisting in this regard. OPW is consulting with Met Eireann about placing a weather station on the island which will assist with baseline climate data. In terms of the impact of climate change on the island and visitor safety, each season climbers assess the slopes for potential rock falls, and a plan is in place to heighten the pier to assist with landings during stormy weather which is increasing during the summer season.</p>

Consultee	Summarised Comment	Response
		<p>A mitigation measure (M15) has been added to the NIS to emphasise that these actions need to be prioritised as follows: <i>Objective 10 of the Proposed Plan and its associated Actions prescribe for a framework for monitoring climate change and its associated impacts to be monitored on Sceilg Mhichíl. With the potential for increasing frequency and intensity of storm events likely to continue, implementation of these Actions should be a priority.</i></p> <p>Additional information has been added to Chapter 6 of the Management Plan on climate change.</p>
An Taisce	<p>Actions 57 and 58 of the 2008 Plan provided for monitoring on climate impact on the island. Information on the resulting data is needed to inform a new 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.</p>	<p>As above, additional information has been added to Chapter 6 of the Management Plan.</p>
An Taisce	<p>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.</p> <p>A review of future actions is needed to determine if mitigation measures are required.</p> <p>This should include a full risk analysis on the potential adverse impacts of any intervention, for example, to combat areas of soil erosion.</p>	<p>All interventions on the island are subject to Ministerial Consent under the National Monuments Acts. Such consent requires all ecological and climate change issues to be considered, and consultation with NPWS before issuing such consents is embedded in this process to meet the requirement to take protection of fauna and flora into account as per European Legislation. On soil erosion, all work is based on conserving existing structures and for that reason we do not alter the footprint of any of the structures and do not increase risk of further erosion.</p> <p>Prior to undertaking any interventions (if required) on Skellig, and in line with Action A4.4 "<i>Ensure an ecological assessment is undertaken for any project or activity which might significantly impact on the biodiversity of the island (including Screening for Appropriate Assessment and Appropriate Assessment if necessary, for any plan or project likely to have a significant effect on the species and their habitats for which the SPA has been designated) so that nature conservation issues are considered alongside built heritage.</i>", the scope of work will be assessed to determine if an ecological assessment is required. All mitigation proposed as a result of the ecological assessment will be implemented as appropriate.</p>

Consultee	Summarised Comment	Response
		<p>All interventions on the island are subject to Ministerial Consent under the National Monuments Acts. Such consent requires all ecological and climate change issues to be considered. Consultation with NPWS before issuing such consents is embedded in this process to meet the requirement to take protection of fauna and flora into account as per European Legislation. While there are few cases where soil erosion is impacting directly on built structures on the island, all work is based on conserving existing structures the footprints of any structures are not altered, thereby minimising the risk of increased further erosion. On slopes where soil erosion is taking place, as above, any adverse impacts of any intervention are considered as part of the consent process.</p>
<p>An Taisce</p>	<p>In addition to ongoing research on the health and protection of the bird populations on Skellig Michael and Little Skellig, there is a need to properly research the marine feed source of the different sea birds, and the effective long term protection of these marine feed area sources through extended Special Protection Area (SPA), Marine Protected Area, or other appropriate measures. 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 needed to determine if any changes have occurred including:</p> <ul style="list-style-type: none"> <li>▪ Numbers or location of ground nesting birds and other sea birds;</li> <li>▪ Loss of vegetation or arrival of potentially invasive species;</li> <li>▪ Visitor interface with bird nesting and feeding areas.</li> </ul> <p>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</p>	<p>Since the publication of the 2008-2018 Plan, the Skelligs SPA was extended under SI. No.74/2010 to include the area of sea between and around the islands which has addressed the need to protect the surrounding waters of the Skelligs.</p> <p>As several of the listed bird species of The Skelligs SPA undertake feeding trips of 10s and even 100s of kilometres away from the island, specific actions relating to the protection of these feeding resources are beyond the scope of the Management Plan. However, this Department recognises the vital importance of maintaining and where necessary improving the status of marine resources away from but ecologically connected to Ireland’s important seabird colonies. For example, the ongoing marine SPA designation process includes various work strands such as further surveys, research and data analysis with a view to identifying important areas in Ireland’s marine waters for marine birds.</p> <p>Objective 4 of the Management Plan: to identify and conserve the natural heritage of the island, contains 14 Actions designed to protect and conserve the ecology of the island. These Actions include:</p> <p><i>A4.5: Continue to develop the seabird monitoring programme, with particular attention to burrow-nesting seabirds in order to derive, among other things, robust population estimates, population trends and the identification of pressures acting on the populations. Such data will inform the management of both public access and the works programme in monitoring potential effects of human activities.</i></p> <p><i>A4.6: On an annual basis, carry out a census count of all cliff nesting seabird species and estimate the breeding productivity of Sceilg Mhichil’s Kittiwake population.</i></p>

Consultee	Summarised Comment	Response
	<p>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.</p>	<p><i>A4.9: Implement, and if necessary update, the biosecurity action plan to deal with accidental or deliberate introductions of predator species.</i></p> <p><i>A4.11: Finalise and publish the vegetation survey, including an investigation of species that may have been cultivated by the monks.</i></p> <p>These Actions have associated targets, indicators and timelines which are listed in Appendix 1 of the Management Plan and in the SEA Monitoring framework.</p> <p>The vegetation survey, due to be finished in 2020, has been delayed due to public health restrictions around COVID-19. Under commitment within the Management Plan the vegetation survey will be made available online within 1 year of Plan's implementation (A4.11) (pending any further delays due to COVID-19).</p> <p>In summary, noting the concerns raised by An Taisce, the Actions as detailed above and embedded in the Proposed Plan will address the issues raised.</p>
<p>An Taisce</p>	<p>There is not yet sufficient monitoring data in place to demonstrate impact or nonimpact of any human activities on Storm Petrels on Sceilg Mhichíl. They are a priority species listed in the EU Birds Directive for vulnerability of nesting habitat. On Sceilg Mhichíl this habitat includes the 600-plus 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.</p> <p>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.</p>	<p>It is acknowledged that there has been insufficient monitoring data collected on Storm Petrels on Sceilg Mhichíl. However, as described in the Management Plan, Appendix 6, P129, a storm petrel survey was undertaken in 2018 which covered the monastery buildings and associated steps and plans for further survey and monitoring work for this species are underway. These ongoing monitoring requirements are accounted for in the Management Plan <i>Action A4.5: Continue to develop the seabird monitoring programme</i>, with particular attention to burrow-nesting seabirds in order to derive, among other things, robust population estimates, population trends and the identification of pressures acting on the populations. Such data will inform the management of both public access and the works programme in monitoring potential effects of human activities.</p> <p>The importance of prioritising the above Plan Action has been reinforced through the following recommendations of the NIS:</p> <ul style="list-style-type: none"> <li>▪ Prioritise SCI species monitoring efforts to ensure data can be used to develop quantitative conservation objectives, recognising that this is required in the long-term to inform future decision making. The following monitoring methods are recommended to supplement the ongoing monitoring campaign for the burrowing nesting bird species:</li> </ul>

Consultee	Summarised Comment	Response
		<ul style="list-style-type: none"> <li>▪ Annual monitoring of breeding success by following a subset of nests checked at the beginning and towards the end of the breeding season to determine the number of chicks fledged per apparently occupied burrow (AOB).</li> <li>▪ Continue the placement of artificial nesting habitat at the site in keeping with the natural environment to facilitate monitoring, particularly of European storm petrel and Manx shearwater whose burrows are less accessible to monitoring than Atlantic puffin.</li> <li>▪ Undertake a desk-based assessment, using monitoring programme data, to understand population distribution across the site and determine what proportion of the population interacts with human activities.</li> <li>▪ Undertake a desk-based assessment, using monitoring programme data, to quantify impacts of visitors by comparing breeding success of birds under/adjacent to paths with those away from immediate visitor traffic.</li> </ul> <p>A new Action A6.13 has been added to the Management Plan. <i>A6.13: Disseminate wildlife guidance information to inform the public of the exceptionalism of the natural heritage of Sceilg Mhichil to raise awareness of its fragility, [the need to remain on the designated pathways] and mitigate any impacts.</i></p>
<p>An Taisce</p>	<p>Skellig's North Atlantic Puffins, and other birds sharing the same food source, have faced intermittent feed source issues in the first decade of this century.</p> <p>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.</p> <p>A key requirement for Ireland is to designate large scale Marine Protected Areas (MPAs) under the EU Marine Strategy Framework Directive and as required under the UN Sustainable Development Goals. These areas are primarily for the conservation of fish species but will have</p>	<p>Potential cumulative impacts of human-induced climate change have been acknowledged in the NIS under Section 3.4 Uncertainties / Gaps and it has been noted that separating the potential pressures identified for the implementation of the Management Plan such as disturbance, from larger scale processes such as climate change is challenging.</p>

Consultee	Summarised Comment	Response
	<p>the parallel benefit of protecting sea bird and marine mammal feed sources. An Taisce made submissions to the Department of Housing Planning and Local Government, including detailed recommendations, on this issue for two Marine Spatial Planning Framework consultations in December 2018 and April 2020.</p>	
<p>An Taisce</p>	<p>The increase in non-landing boat cruises, powered by diesel, could be contributing to cumulative impacts. The impact 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.</p>	<p>NMS do not have the legal authority to restrict vessels from circumnavigating the Skellig islands.</p> <p>It should be noted however, that the potential for visitors to transit around the island does offer an important alternative to visitors landing on Skellig which could help alleviate the pressures from footfall on the island.</p> <p>The NIS recommends the continuation of investigations into the type and number of birds rafting in the waters of Skelligs SPA. This is to determine if species are affected by passenger vessels circumnavigating the island.</p> <p>Additionally, Mitigation M9 is designed to protect species in the surrounding waters <i>"Ensure all boat operators landing visitors on Sceilg Mhichíl or taking visitors on tours around the island, are informed of potential adverse effects from visual and physical disturbance on wildlife (e.g. rafting seabirds and seals) and are requested to avoid disturbance"</i>. NPWS in collaboration with OPW, will develop guidance for boat operators taking tourists around the Skelligs islands with respect to vessel speeds and separation distances from wildlife. A new Action A7.12 <i>"Disseminate guidance to all boat operators landing visitors on Sceilg Mhichíl or taking visitors on tours around the island, to ensure they are informed of potential adverse effects from visual and physical disturbance on wildlife (e.g. rafting seabirds and seals), and are requested to avoid disturbance."</i> has been added to the Management Plan to implement this mitigation measure.</p>
<p>An Taisce</p>	<p>The promotion of helicopter tourism over and around Sceilg Mhichíl is new issue since 2017 after the filming of Star Wars on the island.</p> <p>There is 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</p>	<p>The Management Plan has addressed concerns relating to helicopters flying over and around Sceilg Mhichíl, specifically, Action 4.10 and Action 6.8 as follows: <i>Action 4.10: Exclude recreational and other non-essential helicopter flights from an exclusion zone of 1km surrounding Skelligs SPA.</i></p>

Consultee	Summarised Comment	Response
	<p>helicopter tourism in National Parks and other areas of nature conservation or special sensitivity. The impact of helicopters on Sceilg Mhichíl is especially problematic as its special character is its spirituality.</p> <p>It is recommended that the new Management Plan define an appropriate exclusion zone to protect the peace and character of Sceilg Mhichíl.</p>	<p><i>Action 6.8: Implement a ban on general recreational drone (UAV) usage from an exclusion zone of 1km surrounding Skelligs SPA and create a process for evaluating and authorising appropriate and responsible drone use within this area.</i></p> <p>The NIS has proposed mitigation measure M11 to address the implementation of a ban on recreational drone use.</p> <p><i>M11 - Put in place measures to prevent unauthorised drone flying. These shall include the continued dissemination of information (e.g. at booking, at the piers on the mainland, on the boats) to explain why unauthorised drones are banned on the site, along with the creation of a process for the authorisation of legitimate drone usage on-site.</i></p> <p>M11 will be implemented through a new Action A6.15.</p>
An Taisce	<p>For many years, Skellig has featured in national and international films and television documentaries, where access has been appropriately facilitated, including the appropriately regulated use of helicopters.</p> <p>The 2008 Skellig WHS Management Plan did not envisage filming of the scale and impact of State-approved 2014 and 2015 film location permits for “Star Wars”.</p> <p>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.</p>	<p>All filming on Skellig is strictly controlled and any future filming for any purposes will also be strictly controlled.</p> <p>A detailed method statement was provided by the producers of Star Wars and a series of protection measures and protocols in relation to the built and natural heritage on the island were agreed with them by the Department, including full on-site supervision by State personnel of all activities undertaken by the film crew (covering preparatory works, filming and removal). Any possible impacts and protection measures were the subject of in-depth review by NPWS in respect of both seabird and SPA interests (constituting inter alia a screening for AA), as well as other elements of biodiversity of the Islands. Consent for filming was granted under the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. 477 of 2011) and the European Communities (Conservation of Wild Birds (Skelligs Special Area of Conservation 004007)) Regulations 2010 (S.I. 74 of 2010). The Department is entirely satisfied that the activities undertaken had no implications for the Outstanding Universal Value of the World Heritage Property.</p> <p>The Department is also satisfied that no impact was made on the natural heritage of the island, or on any of the approaches to it, and that the activities undertaken as part of the film production avoided any significant damage to the populations of breeding birds present, or the biodiversity of the island. A full report on how the filming was carried out was sent to UNESCO and is available.</p>
Birdwatch Ireland	<p>Birdwatch Ireland welcome the development of the SEA and NIS for the Plan and have the following comments.</p>	<p>This statement has been added to Chapter 7 of the Plan.</p>

Consultee	Summarised Comment	Response
	<p>The Statement of Intent must include the following outcome:</p> <p>Ensure that the objectives of the Birds and Habitats Directives are met as they relate to the designations associated with Skellig Michael.</p>	
<p>Birdwatch Ireland</p>	<p>It was identified in the NIS that visitor access could significantly impact several SCIs of Skelligs SPA and the NIS states that:</p> <p>“Without detailed data on the distribution of each of the three species across the island and sufficient data on annual breeding success, it is not possible to assess with accuracy the proportion of the population of each species which may be impacted by visitor visual disturbance and whether the increase in the average number of visitors over the previous plan’s life (from an annual average of 11,507 from 2009-2013 to an annual average of 15,061 from 2014-2018) (NMS, 2020) has resulted in adverse effects on population levels”.</p> <p>Without the monitoring data it is not possible to determine the impacts of visitor access on the conservation interests of the site. Therefore complete, precise and definitive findings of no significant impacts on the conservation interests of the site are not possible.</p> <p>Systematic data gathering on breeding success and distribution of species is urgently required to inform reviews of visitor access and impacts on bird species on the island and to be able to conclude the NIS.</p>	<p>Implementation of the mitigation measures detailed in the NIS will prevent significant impacts from visitor access occurring.</p> <p>The NIS acknowledges the urgency of prioritising the continued Special Conservation Interest (SCI) species monitoring efforts through the NIS recommendations in Section 8.2. <i>'Prioritise SCI species monitoring efforts to ensure data can be used to develop quantitative conservation objectives, recognising that this is required in the long-term to inform future decision making.'</i> It goes on to recommend four monitoring methods to supplement the ongoing monitoring campaign.</p> <p>Whilst the assessment in the NIS identifies a number of adverse effects on the SCI species from visitor access, the assessment following the application of mitigation measures concludes that in the short term there will be no significant effects on the SCI species if all mitigation measures M2 - M10 are fully implemented.</p> <p>In the longer-term monitoring studies will help inform decision making with regards to visitor numbers and additional mitigation measures may be proposed / changed in light of this new information to strengthen the protection of existing populations of Sceilg Mhichíl.</p> <p>The wording in the NIS under Section 7.1.1.3, Assessment of Site Integrity with Mitigation, has been strengthened to make it clear that should the monitoring data determine that visitor numbers are not sustainable, capping on numbers will be updated.</p> <p>A new mitigation measure has been added to the NIS, specifically, <i>“M16: Assess the impacts of visitors and related activities in Year 5 of the plan period, informed by the monitoring data collected in the first 4 years and take any necessary action afoot of such an assessment.”</i> This mitigation measure will be implemented through a new Plan Action A4.18.</p>
<p>Birdwatch Ireland</p>	<p>The mitigation measures proposed on the topic of visitor access are for the most part vague, have no accountability and are unproven. Wording such as ‘Continue to explore’,</p>	<p>In response to this comment, the mitigation measures proposed for the visitor access have been expanded and all mitigation measures are now linked to a specific Plan Action/s,</p>

Consultee	Summarised Comment	Response
	<p>'Explore options' are not sufficient to meet the requirement of 'precise, complete and definitive findings of no significant impact' on the Conservation Interests of the site. These measures need significant strengthening and proof is required that they are effective.</p> <p>We are also unclear as to how the mitigation measures are reflected accurately as actions in the actual Management Plan. For example, it is not clear where exactly M5 (Carry out regular spot checks on points along the access pathways to ensure visitor compliance with adhering to the designated pathways on the site) is reflected in the Plan. All mitigation measures need to be reflected in any future plan.</p>	<p>which in turn have associated targets and timescales. The following changes have been made:</p> <p>M5 - Carry out daily spot checks on points along the access pathways to ensure visitor compliance with adhering to the designated pathways on the site. Collect data and report on findings to support Plan Action A4.5: "Continue to develop the seabird monitoring programme, with particular attention to burrow-nesting seabirds in order to derive, among other things, robust population estimates, population trends and the identification of pressures acting on the populations. Such data will inform the management of both public access and the works programme in monitoring potential effects of human activities." This mitigation measure will be implemented through Plan Action A6.14.</p> <p>M6 - Establish a staggered regime for the arrival times of boats over the course of the day to reduce overcrowding on the site and reduce the potential for visitors to venture from the designated pathways. Monitoring data collected over the first 5 years of implementation of the Management Plan will be used to assess whether the positive benefits to SCI species of staggering visitor arrival times outweighs any negative effects. This mitigation measure will be implemented through Plan Action A7.11.</p> <p>M7 - Continue to provide clear, concise and effective messaging to individuals visiting the island on the need to remain on the designated pathways. This should be done both before boarding a vessel through displaying appropriate signage at the departure points, and after disembarking on the island through talks from accredited guides. This will reinforce its importance to visitors. This mitigation measure will be implemented through Plan Action A6.13.</p> <p>M8 - Objective 8 of the Management Plan, through Actions A8.4, A8.6, A8.7, and A8.8, aims to help further promote visitor activities on the mainland of Ireland. The improvement and promotion of such activities may help to reduce the number of visitors travelling to Sceilg Mhichíl, reducing the potential for disturbance to occur.</p> <p>M9, M10 and M11 have been added to the SEA Monitoring framework table which defines targets, indicators and timescales for applicable Plan Actions and Mitigation Measures and timescales have been set to ensure early implementation of the measures.</p> <p>All mitigation measures including M5, NIS recommendations and the SEA monitoring framework have now been integrated within the final management plan.</p>

Consultee	Summarised Comment	Response
Department of Housing, Local Government and Heritage (DHLGH) (formerly Department of Culture, Heritage and the Gaeltacht (DCHG))	Detailed assessment of Draft Plan actions A4.5, A4.6, A4.12 and A4.13 (Table 5.2 of the NIS) should be undertaken because of the sensitivity of SCI species to human disturbance and in particular the sensitivity of burrow-nesting species. While the data obtained from these actions will benefit conservation management on the island, the research activities themselves should be assessed for potential impacts to SCI species and any necessary mitigation measures identified and included in the Draft Plan. For example, the timing of such activities should not lead to disturbance impacts when considered with ongoing activities or other research activities on the island.	It is agreed that such research activities themselves could lead to disturbance to the SCI species and consideration and assessment of potential impacts will be required prior to undertaking such activities. However, these are project level activities which are outside the remit of this strategic environmental assessment of the Management Plan.  Action 4.4 of the Management Plan ensures an Ecological Assessment is undertaken for any project or activity which might significantly impact on the biodiversity of the island. The specific details for the surveys proposed in A4.5, A4.6, A4.12 and A4.13 are not available at present and are not in the scope of this assessment. As above, all such research activity will be considered in detail as regards potential impacts with a view to ensuring that there are no impacts.
DHLGH	The following actions in relation to Objective 6, 7 and 9 set out in Table 5.2 of the NIS may also need to be assessed in detail:  i. A6.3: The deployment of Guides has the potential to impact SCI species given their sensitivity to disturbance.  ii. A7.5: It is unclear from the action whether the training activities involved will take place on the island. If this is the case further consideration should be given to this action, and appropriate mitigation proposed as required.  iii. A9.2. It is unclear from the action whether the waste-management strategy which is being deployed has the potential to affect SCI species. This matter requires further examination and assessment if required.	i) The presence of the guides represents a very small percentage of the people on the island every day during the visitor season and it is their presence which helps to protect SCI species by educating and regulating the visitors. Guides have been on the island for over 30 years, long before the first plan in 2008 was drafted. The 2020 - 2030 Management Plan considers the addition of one extra guide. This has been proposed having given consideration to the benefits of an additional guide to further help regulate visitors on the island.  ii) Any accident and rescue scenarios carried out on the island would be subject to appropriate ecological assessment prior to them beginning, as per Action 4.4 of the Management Plan.  iii) The current waste management strategy for the site is detailed on page 57 of the Management Plan. All waste is segregated before it is removed from the island on a weekly basis and disposed of and/or recycled as appropriate and as agreed with the Environmental Officer of Kerry County Council. The waste bins are securely contained with no pathways for intrusion from pests.
DHLGH	A detailed assessment of actions in the Draft Plan is set out in Section 7 of the NIS. The following matters are highlighted in this regard:	Conclusion tables at the end of each pressure (visual disturbance, habitat loss, Invasive / Non-Native Species INNS and climate change) have been added to Section 7.1 of the NIS. Each table sets out the potential effects of the pressure on each SCI, whether the effect is

Consultee	Summarised Comment	Response
	<p>a) An assessment of actions is presented in Section 7.1 and a summary of the outcomes provided in Table 7.2. While the conclusions reached, for each of the pressures identified in relation to each SCI, are clearly set out in Table 7.2, the basis for conclusions in relation to each SCI for each pressure identified, is not clearly set out in Section 7.1. This information needs to be set out clearly (preferably in tabular form) so that the basis for the conclusions reached, for each SCI in relation to each pressure identified, is set out both without mitigation measures and taking into account the proposed mitigation measures.</p>	<p>significant, proposed mitigation (if any) to remove/reduce the effect, a summary of the effect with mitigation, and finally if there is a significant effect with mitigation applied.</p>
DHLGH	<p>It should also be clearly stated in the overall conclusions (Section 8.1) that a range of potential negative impacts to SCIs was identified in the assessment and that conclusions drawn in relation to the impacts of the plan on the integrity of the Skelligs SPA are dependent on the full and effective implementation of the mitigation measures proposed.</p>	<p>The following statement has been added to Section 8.1 of the NIS: '<i>While potential negative effects on the SCIs of the Skelligs SPA were identified in the assessment of the Proposed Plan, the integrity of Skelligs SPA will be maintained, depending on the full and effective implementation of the mitigation measures proposed.</i>'</p>
DHLGH	<p>While potential impacts arising from the renovation of the lighthouse complex have been considered, no consideration seems to have been given to the potential impacts at the operational stage. In this regard, the information set out in Table 5.2, in relation to A2.1 clearly indicates the potential for disturbance from increased numbers of visitors and staff to this part of Sceilg Mhichíl. This matter should be given further consideration. In addition a firm timeframe needs to be set out in relation to the review of lighting arrangements for the operation of the lower lighthouse complex set out in mitigation measure M1.</p>	<p>The assessment of potential effects arising from the renovation works of the lighthouse complex looked at noise and light disturbances. Noise during construction will be greater than noise during operation. As the impact of construction noise was assessed as non-significant, this pressure was not considered further for the operation of the lighthouse. The lower lighthouse complex's primary use is for accommodation for the resident guides and any researchers conducting longer-term studies on Sceilg Mhichíl. While the toilet facilities, when complete, will be open to the public the level of visitor and staff traffic to the complex will not be of a high enough level to cause significant disturbance to any nesting birds in the vicinity of the complex and the road leading to it.</p> <p>The effects of light pollution during construction and operation were assessed. The NIS concluded that without mitigation there will be no significant adverse effect on the burrowing nesting Special Conservation Interest species. Without prejudice to the conclusion of no significant effects, mitigation M1 has been proposed as best practice. In</p>

Consultee	Summarised Comment	Response
		<p>response to comments received during the SEA ER Consultation, mitigation measure M1 has been changed to read "<i>Within one year of plan implementation review lighting arrangements for the operation of the Lower Lighthouse complex and if necessary, and where practicable, within a further one year implement lighting measures, such as use of blinds, downwards lighting, to reduce the risk of bird strikes.</i>" This mitigation measure will be implemented through Plan Action A4.15."</p>
<p>DHLGH</p>	<p>As set out in the NIS, there is potential for adverse impacts to arise from planned conservation and maintenance works in relation to the built heritage, due to the sensitivity of SCI species to disturbance, and in particular the sensitivity of burrow-nesting species in this regard.</p> <p>It is important therefore that appropriate mitigation measures are in place and are implemented in full to avoid and/or reduce such impacts as required. The provision for project level ecological assessment for all new projects occurring on site as set out in mitigation measure M2 is therefore very important.</p> <p>This commitment should be strengthened by including a separate mitigation measure in relation to the requirement for screening for Appropriate Assessment and Appropriate Assessment (where required) for downstream plans and projects. Such assessments are required by the provisions of the European Communities (Birds and Natural Habitats) Regulations, 2011, and should be treated as a separate (albeit related) matter to any broader commitment in relation to ecological assessment.</p> <p>Mitigation measure M3 should also include a commitment to ecological assessment for works programmes in order to inform site-specific mitigation measures.</p>	<p>Mitigation measure M2, and Action 4.4, include provision for Screening for Appropriate Assessment and as necessary Appropriate Assessment for any plan or project likely to have a significant effect on the species and their habitats for which the SPA has been designated. The mitigation measure reads: "<i>Implementation of Action 4.4 of the Proposed Plan, 'Ensure an Ecological Assessment is undertaken for any project or activity which might significantly impact on the biodiversity of the island (including Screening for Appropriate Assessment and Appropriate Assessment if necessary, screening for any plan or project likely to have a significant effect on the species and their habitats for which the SPA has been designated)', will ensure any works programme is assessed prior to it commencing. This will be conducted in consultation with NPWS so that nature conservation issues are considered alongside built heritage.</i>"</p> <p>Implementation of the mitigation measure, and thus Action 4.4 of the Management Plan, will ensure all works programmes are assessed prior to commencement with appropriate mitigation identified as required. All ecological assessments (including Screening for AA and AA) will be conducted in consultation with NPWS so that nature conservation issues are considered alongside built heritage.</p> <p>With respect to mitigation measure M3 which relates to site specific mitigation measures for works and research programmes, the requirement for an ecological assessment has not been included because it is covered by mitigation measure M2 which requires all projects and activities which may significantly affect the SPA to be subject to an ecological assessment.</p>

Consultee	Summarised Comment	Response
DHLGH	<p>The NIS states that without detailed monitoring data it is not possible to assess with accuracy the proportion of the population of each species which may be impacted by visitor disturbance and whether the increase in the average number of visitors over the previous plan's life has resulted in adverse effects on population levels.</p> <p>In the absence of detailed information, it should be assumed, in light of the precautionary principle, that such impacts will occur.</p> <p>The mitigation measures proposed must be effective and a clear path to their implementation must be set out.</p> <p>M5 requires a commitment to be made to the timing of spot checks taking into account the potential for adverse impacts to the SCI species involved.</p> <p>M6 to be a mitigation measure requires a commitment to actually implement changes to the timings of visitor arrivals and departures rather than a commitment to simply explore this matter.</p> <p>M8 needs to be a firm commitment to specific action or actions in order to be considered a mitigation measure.</p> <p>M9, M10 and M11 require timelines for early implementation for effectiveness to be achieved.</p> <p>M13 requires a firm and time-bound commitment to action in order for it to be considered an effective mitigation measure.</p>	<p>In response to this comment, the following mitigation measures have been expanded and all mitigation measures are now linked to a specific Plan Action/s, which in turn have associated targets and timescales.</p> <p>M5 - Carry out daily spot checks on points along the access pathways to ensure visitor compliance with adhering to the designated pathways on the site. Collect data and report on findings to support Plan Action A4.5: "<i>Continue to develop the seabird monitoring programme, with particular attention to burrow-nesting seabirds in order to derive, among other things, robust population estimates, population trends and the identification of pressures acting on the populations. Such data will inform the management of both public access and the works programme in monitoring potential effects of human activities.</i>" This mitigation measure will be implemented through Plan Action A6.14.</p> <p>M6 - Establish a staggered regime for the arrival times of boats over the course of the day to reduce overcrowding on the site and reduce the potential for visitors to venture from the designated pathways. Monitoring data collected over the first 5 years of implementation of the Management Plan will be used to assess whether the positive benefits to SCI species of staggering visitor arrival times outweighs any negative effects. This mitigation measure will be implemented through Plan Action A7.11.</p> <p>M8 - Objective 8 of the Management Plan, through Actions A8.4, A8.6, A8.7, and A8.8, aims to help further promote visitor activities on the mainland of Ireland. The improvement and promotion of such activities may help to reduce the number of visitors travelling to Sceilg Mhichíl, reducing the potential for disturbance to occur.</p> <p>M9, M10 and M11 have been added to the SEA Monitoring framework table which defines targets, indicators and timescales for applicable Plan Actions and Mitigation Measures and timescales have been set to ensure early implementation of the measures.</p> <p>M13 - Put in place further signage and physical measures at the site entrance to further dissuade unauthorised access outside of the visitor season and/or use of CCTV cameras to monitor the pier area. This mitigation measure will be implemented through Plan Action A6.16.</p>
DHLGH	<p>The NIS proposes a range of monitoring measures to be implemented (see page 56 and Section 8.2). It is</p>	<p>The monitoring measures referred to will be implemented by Actions A4.5 and A4.18 through their associated targets and timelines as presented in the SEA Monitoring Framework and the Plan Appendix 1 Summary of Action Programme. Action A4.5 targets</p>

Consultee	Summarised Comment	Response
	<p>important that these monitoring proposals are included as time-bound actions in the Draft Plan.</p> <p>In addition, there should be an action in the Draft Plan to assess the impacts of visitors and related activities in Year 5 of the plan period, informed by the monitoring data collected in the first 4 years, together with a commitment to take any necessary action on foot of such assessment.</p>	<p>and timelines have been updated to incorporate the following monitoring measures listed in 7.1.1.3 Assessment of Site Integrity with Mitigation:</p> <ul style="list-style-type: none"> <li>▪ Population distribution data will help determine what proportion of the population of each species comes into contact with human activity and has the potential to be disturbed by visitors and if this disturbance could result in significant adverse effects at the population level.</li> <li>▪ Breeding success monitored at areas of high visitor footfall and areas where there are no visitors will help assess trends in breeding success in relation to visual and physical disturbance from visitors. This will help determine if visitor numbers are sustainable and help focus where further mitigation measures may be required.</li> </ul> <p>And in Section 8.2 Recommendations:</p> <ul style="list-style-type: none"> <li>▪ Annual monitoring of breeding success by following a subset of nests checked at the beginning and towards the end of the breeding season to determine the number of chicks fledged per apparently occupied burrow (AOB).</li> <li>▪ Continue the placement of artificial nesting habitat at the site in keeping with the natural environment to facilitate monitoring, particularly of European storm petrel and Manx shearwater whose burrows are less accessible to monitoring than Atlantic puffin.</li> </ul> <p>Mitigation measure M16: <i>'Assess the impacts of visitors and related activities in Year 5 of the plan period, informed by the monitoring data collected in the first 4 years and take any necessary action afoot of such an assessment. This mitigation measure will be implemented through Plan Action A4.18.'</i> has been added to the NIS and Action A4.18 has been added to the Plan. The targets of this action incorporate the following points from the NIS Section 8.2 Recommendations:</p> <ul style="list-style-type: none"> <li>▪ Undertake a desk-based assessment, using monitoring programme data, to understand population distribution across the site and determine what proportion of the population interacts with human activities.</li> <li>▪ Undertake a desk-based assessment, using monitoring programme data, to quantify impacts of visitors by comparing breeding success of birds under/adjacent to paths with those away from immediate visitor traffic.</li> </ul>

Consultee	Summarised Comment	Response
DHLGH	In relation to the potential for climate change to affect the Skelligs SPA it is important that the proposed mitigation measure (M15) indicates firm and early implementation timelines for actions A10.1, A10.3 and A10.4 in order to be effective.	Mitigation M15 in the NIS specifies that implementation of the Actions under Objective 10 should be a priority. The SEA Monitoring framework indicates that A10.1 'Develop a framework for monitoring climate change' is to be commenced with 3 months of implementation of the plan and developed within 2 years; A10.3 'Monitor the change of structures using technical assistance as required' will be undertaken annually each spring and A10.4 'Monitor, on an ongoing basis, other factors that may impinge on the built and natural environment' has been updated to 'Monitor, on an annual basis, other factors that may impinge on the built and natural environment'.
Environmental Protection Agency (EPA)	The Plan refers to the former Department of Culture, Heritage and Gaeltacht, rather than the current responsible government department. It would be helpful to update this, in finalising the Plan.  You should also ensure that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Southern Regional Spatial and Economic Strategy.	Where relevant, the department name has been changed to The Department of Housing, Local Government and Heritage.  The Plan has been written in consideration of the listed strategies and frameworks. Appendix A-1 of the SEA details all relevant plans/projects and how they have been considered in the SEA.
EPA	Our State of Environment Report Ireland's Environment – An Assessment 2020 (EPA, 2020) identifies thirteen key messages for Ireland. Delivering Ireland's long-term sustainable development and environmental protection goals will require a concerted effort by government departments to address these key actions.  In finalising the Plan and integrating the findings of the SEA into the Plan, the relevant recommendations, key issues and challenges described in our recent State of the Environment Report Ireland's Environment – An	In the Management Plans development and implementation, the relevant recommendations, key issues and challenges described in the EPA's State of the Environment Report Ireland's Environment – An Assessment 2020 (EPA, 2020) <sup>2</sup> have been and will be taken into account. This is now stated in Chapter 1 of the Management Plan.

<sup>2</sup> EPA. (2020). Ireland's Environment: An Integrated Assessment 2020. [Online]. Available at: [https://www.epa.ie/pubs/reports/indicators/EPA\\_Irelands\\_Environment\\_2020.pdf](https://www.epa.ie/pubs/reports/indicators/EPA_Irelands_Environment_2020.pdf) [Accessed May 2021].

Consultee	Summarised Comment	Response
	Assessment 2020 (EPA, 2020) should be taken into account.	
EPA	You should screen any future amendments to the Plan for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the Plan	Section 8.2 of the NIS includes the recommendation 'any future amendments made to the Plan will be subject to AA'. This recommendation has been included as target to Action A1.1 of the Plan “Monitor implementation and effectiveness of the Plan Actions”.
EPA	Under the SEA Regulations, you should also consult with: <ul style="list-style-type: none"> <li>▪ Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media (formerly Minister for Culture, Heritage and the Gaeltacht (functions transferred from Minister for Environment, Heritage and Local Government/ Minister for Housing, Planning and Local Government to Minister for Culture, Heritage and the Gaeltacht by S.I. 192 of 2011);</li> <li>▪ Minister for Environment, Climate and Communications (formerly Minister of Communications, Climate Change and the Environment); and</li> <li>▪ Minister for Agriculture, Food and the Marine;</li> </ul>	The Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media, the Minister for Environment, Climate and Communications and the Minister for Agriculture, Food and the Marine were invited to comment on the Draft Plan, SEA ER and NIS as part of the public consultation process.
EPA	With regards the Objectives and Actions to Achieve the outcomes in the Statement of Intent, the following comments are made for consideration prior to finalising the Plan / SEA. (Changes in BOLD) - Objective 1: To have in place and implement an effective management framework to protect the Outstanding Universal Value of Sceilg Mhichíl - Objective 2: To improve liaison engagement with local-interest groups and other relevant parties	The listed changes have been made to Objectives 1, 2 and Objective 5 Action 5.1 in the Management Plan.

Consultee	Summarised Comment	Response
	- Objective 5 Action 5.1 – Adopt and implement this management plan as a framework for the policies, future plans and decisions regarding Sceilg Mhichíl	
EPA	We acknowledge the subsection on ‘Monitoring and Reviewing the Effectiveness of the Management Plan’ and note the review of the Plan every five years and the annual reporting aspects. There is merit in clarifying whether this reporting will include reporting on environmental related monitoring.	The ‘Monitoring and Reviewing the Effectiveness of the Management Plan’ section of the Management Plan has been updated to cross reference to two new relevant Actions as follows: Action A1.1 "Monitor implementation and effectiveness of the Plan Actions" "A4.18 Assess the impacts of visitors and related activities in Year 5 of the plan period, informed by the monitoring data collected in the first 4 years and take any necessary action afoot of such an assessment." Both Actions would include environmental reporting where applicable. Additionally, the SEA Monitoring framework makes provision for environmental monitoring on an annual basis e.g. Actions 4.5, 4.6 and 4.9.
EPA	Non-Technical Summary (NTS) -There is merit in including a map showing the area covered by the Plan.	A map has been added to the NTS of the SEA ER which shows the area covered by the Plan and the area covered by the SEA ER.
EPA	In Table 4.3 – Potential in-combination effects of relevant plans/projects within the Proposed Plan, consider the following aspects in finalising the Plan. In relation to the reference to Kerry County Development Plan 2015-2021, Kerry County Council is currently preparing a new development plan for the period 2022-2028 and this should be acknowledged. Reference to the Regional Planning Guidelines – South-West Region 2010-2022 should be removed, given that these has been replaced by the Southern Regional Spatial and Economic Strategy.	Reference to the 2022-2028 Plan currently being prepared by Kerry County Council has been added to the SEA ER and NIS. Reference to the Regional Planning Guidelines – South-West Region 2010-2022 has been removed in both reports.
EPA	Regarding the assessment of reasonable alternatives to the Plan (Section 4.1), we recommend that further information be included to show what other alternatives were considered, and how the assessment of these	The primary alternative to the plan identified was the extension of the visitor season to Sceilg Mhichíl. The SEA ER described this plan and outlined why it was not a feasible alternative. The remaining alternatives considered were in the form of alternate wordings of Actions in the Management Plan and the potential addition of new Actions, in Sections

Consultee	Summarised Comment	Response
	alternatives has led to the selection of the preferred alternative. You should also assess the alternatives considered against the 'Strategic Environmental Objectives' identified in the SEA ER.	5.1.1 and 5.1.2 respectively. The reasons for these potential changes/additions were outlined in the relevant Sections. These alternatives were then assessed against the Strategic Environmental Objectives in Table C-13 to determine what, if any, positive or negative effects may arise from their implementation.
EPA	The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. If the monitoring identifies adverse impacts during the implementation of the Plan, you should ensure that suitable and effective remedial action is taken.  EPA guidance on SEA-related monitoring is available on our website at <a href="https://www.epa.ie/pubs/advice/ea/guidanceonseastatementsandmonitoring.html">https://www.epa.ie/pubs/advice/ea/guidanceonseastatementsandmonitoring.html</a>	The monitoring programme set out in the SEA ER details specific targets, indicators and timescales for each of the Actions of the Management Plan that require monitoring. This programme includes monitoring of positive effects, such as those of seabird monitoring programmes, and potentially negative effects, such as the effects of climate change. The targets and indicators detailed in the programme provide for actions to be taken as a result of the monitoring, such as the implementation and potential updating of the islands Biosecurity Plan, to be implemented under Action 4.9 of the Management Plan.
Fáilte Ireland	It is noted and welcomed that sustainable tourism has been considered for visitors under Objective 6 of the draft Plan. It would be further encouraged to consider how the Plan identifies with and integrates relevant United Nations Sustainable Development Goals (SDG's) and "The Sustainable Development Goals National Implementation Plan 2018-2020".	The Proposed Plan has been developed in the context of Ireland's SDG National Implementation Plan 2018-2020, with Objective 6 of Management Plan (and its associated Actions) aiming to ensure that visitor access to Sceilg Mhichíl is conducted in a sustainable manner. This relates to Action 8.9 of Ireland's SDG Implementation Plan, which states 'By 2030, devise and implement policies to promote sustainable tourism that creates jobs and promotes local culture and products'. Through being developed in the context of the SDG National Implementation Plan 2018-2020, the Management Plan aids in implementing the United Nations Sustainable Development Goals.
Fáilte Ireland	It is not clear where under Table A-1, Appendix A the VICE Model for Sustainable Tourism has been included or considered.	The VICE model has been added under the International/EU section of Table A-1, Appendix A in the final version of the SEA ER.
Fáilte Ireland	It was recommended that given the importance of tourism relative to the Draft Master Plan area the following documents should also be considered for	The Skelligs Coast Visitor Experience Development Plan was detailed and assessed in the cumulative effects Assessment of the SEA ER (Section 4.4). This plan, and the other plans listed here, have been added into Tables 3-1 and A-1.

Consultee	Summarised Comment	Response
	<p>inclusion in the list of Key Plans, Programmes and Legislation Relevant to the Proposed Plan;</p> <ul style="list-style-type: none"> <li>▪ People, Place &amp; Policy: Growing Tourism to 2025 (DDTAS)</li> <li>▪ Tourism Action Plan (DDTAS)</li> <li>▪ Skelligs Coast Visitor Experience Development Plan</li> </ul> <p>We note that this has not been considered and would advise that these plans should be included in both Table 3-1 and Table A-1 of the Environmental Report. In addition, we recommend that “The Sustainable Development Goals National Implementation Plan 2018-2020” should also be considered for inclusion in these tables.</p>	
Fáilte Ireland	<p>In relation to mitigation measures as set out under the NIS M21 and M22 do not appear to be included.</p>	<p>Reference to M21 and M22 was an error. The original list of mitigation measures in the NIS did include M21 and M22 but by the time the SEA ER went out to public consultation on 4 November 2020 these mitigation measures had been updated. Reference to these two former mitigation measures was missed in Appendix D (Consultation Responses) to the SEA ER. The mitigation measures listed in this response were based on a previous version of the NIS, prior to several mitigation measures being reclassified and merged. As such, the mitigation measures listed in this section of the response should read as M5, M6, M7, M11 and M13 (M8 and M21 were merged into a single measure). This has been updated in the final SEA ER.</p>
Fáilte Ireland	<p>It is unclear what is intended by the following statement as set out under Section 4.1.1 of the environmental report - “As such, the SEA ER will solely consider the version of the Proposed Plan dated 19th of June 2020”</p>	<p>The statement referred to in the comment "As such the SEA ER will solely consider the version of the Management Plan dated 19th June 2020" is made at the end of Section 4.1.1. Section 4.1.1 concludes that the main Assessment of Alternative - the duration of the visitor season, was not a viable alternative option in the Management Plan on a number of grounds. The statement “As such, the SEA ER will solely consider the version of the Management Plan dated 19th of June 2020” was intended to make it clear that since this alternative had been rejected the assessment in the rest of the report was on the Management Plan as it was submitted at 19th June 2020 alone.</p>

Consultee	Summarised Comment	Response
		<p>Further Alternatives to the 19th June 2020 Management Plan have been proposed in the SEA ER in the form of Alternative wording to some of the Plan Actions and additional new Plan Actions. All these alternatives as per the requirements of the SEA Directive, have been separately assessed against the SEA Objectives and screened for AA. The assessment of the updated and new actions has been provided in Appendix C of the SEA ER.</p>
Fáilte Ireland	<p>The recommendations set out under “Assessment of Site Integrity with Mitigation” (see below) should form mitigation measures on pg. 55 of this document.</p> <p>It is vitally important to ascertain this information to ensure there is a meaningful and sustainable approach to future management of the site.</p> <ul style="list-style-type: none"> <li>▪ Population distribution data will help determine what proportion of the population of each species comes into contact with human activity and has the potential to be disturbed by visitors and if this disturbance could result in significant adverse effects at the population level.</li> <li>▪ Breeding success monitored at areas of high visitor footfall and areas where there are no visitors will help assess trends in breeding success in relation to visual and physical disturbance from visitors. This will help determine if visitor numbers are sustainable and help focus where further mitigation measures may be required.</li> </ul>	<p>The text referred to as 'the recommendations set out under “Assessment of Site Integrity with Mitigation”, describes the monitoring studies which are part of the ongoing monitoring campaign referenced in Action A4.5 'Continue to develop the seabird monitoring programme with particular attention to burrow-nesting seabirds in order derive, among other things, robust population estimates, population trends and the identification of pressures acting on the populations. Such data will inform the management of both public access and the works programme in monitoring potential effects of human activities.'</p> <p>Whilst the importance of collecting the SCI monitoring data is recognised, it is not possible to include monitoring as a form of mitigation. Monitoring does not mitigate an adverse effect. The monitoring data will enable the management team on Sceilg Mhichíl to make more informed decisions on visitor management and this may in turn lead to new mitigation measures such as further reducing the limit of visitors to the island.</p> <p>At the end of the NIS further emphasis is placed on the importance of prioritising the monitoring efforts and four monitoring methods are recommended to supplement the ongoing campaign.</p>
Fáilte Ireland	<p>The management and implementation of the Proposed Plans secondary aim ('to promote an appreciation of its uniqueness (Outstanding Universal Value) to a local, national and world audience') is unclear. In order to establish a sustainable awareness campaign regarding the OUV, with high levels of audience engagement there will need to be a comprehensive Information &amp;</p>	<p>The mainland visitor centre is to provide a visitor experience for those who cannot visit the Skelligs for health reasons or due to bad weather; to provide information on other sites in the region and to provide further information for those who have already been to Skelligs or are about to go. The boat trip provides a context for the visit and the visit itself is well guided. Integrating these elements does not fall to the Plan but the need to provide an overall visitor experience of world class grade expected from a WHS is recognised and a line to this regard has been added to the Plan (under Rationale for Objective 6 saying that</p>

Consultee	Summarised Comment	Response
	<p>Communications Plan, with dedicated resources and monitoring systems.as an integral part of the Management Plan.</p> <p>The plan doesn't provide for how the three elements of the mainland visitor centre, the ferry journey and the on-island experience, will be combined into the overall visitor experience of world class grade expected from a WHS.</p>	<p><i>an aim will be to provide an overall visitor experience of world class grade expected from a WHS).</i></p> <p>The creation of a Stakeholder Forum as Actioned in the plan will enable necessary coordination in this space.</p>
Fáilte Ireland	<p>To maintain the daily limit of 180 visitors to the island, a model based on alternative dwell times will need to be developed taking into account the upgrades at the mainland visitor centre, boat routes and island lighthouse.</p> <p>There needs to be ongoing evaluation of the visitor flow on the island to make sure it is compliant with the VEDP.</p>	<p>As actioned in the Plan A6.4, analysis of visitor numbers and trends is a commitment and this will inform on an ongoing basis how this fits within an overall sustainable tourism package for the region, in liaison with Failte Ireland, as actioned at A6.5.</p> <p>The development of a suitable marketing / communication strategy will be a key aspect to follow the development of the mainland VC and this would fit well within the Forum early business.</p>
Fáilte Ireland	<p>We would recommend that a systematic system of data collection would be put in place to comprehensively collate consumer insights gathering informing statistics on levels of awareness and appreciation of the value of the WHS.</p>	<p>The Mainland Visitor Centre will engage in regular visitor data collection and will coordinate qualitative information directly and via the Sceilg Mhichíl page on OPW's relaunched website <a href="http://www.heritageireland.ie">www.heritageireland.ie</a>.</p>
Irish Cruising Club	<p>People have been landing on Sceilg Mhichíl from modest yachts for at least a century. Alongside berthing and anchoring are not feasible, but crews have been landed by inflatable dinghy without obstructing the jetty and have been able to explore the ancient buildings and savour the ambience and spirituality of the island, while at least one crew member stays with the yacht offshore.</p> <p>The present public interest in the island, in no small measure inspired by its use in Star Wars films, has essentially taken up the entire permitted footfall of 180 persons per day (and has led to an enormous increase in the ferry fares).</p>	<p>Action 6.10 has been updated to remove reference to 'larger', and now reads "Continue the practice of excluding private vessels from landing visitors on the island". Text in the Management Plan has been updated to read "access by private craft is not authorised".</p>

Consultee	Summarised Comment	Response
	The draft plan states that "access by private craft is strongly discouraged" but Action 6.10 appears to qualify that in saying "Continue the practice of excluding larger private vessels from landing visitors on the island" (my italics). No definition of "larger" is provided.	
Irish Cruising Club	We request that the footfall quota be increased by four persons per day, with those four places reserved for yacht crew. We recognise the safety implications, but there has never been an accident involving a yacht's crew. Yacht crews tend, on the whole, to be fit and agile, and well accustomed to challenging conditions and difficult terrain. They do not need to be helped ashore on a jetty. They also tend to read the rules and abide by them. They are self-sufficient and may be relied upon to leave when they have completed their visit.	We will not be increasing footfall to accommodate landing on the island by boats which are not authorised to do so as this would set a precedent which would lead to an unmanageable and unsafe situation.  There is an understanding that vessels that need to land for safety reasons may do so.
Irish Cruising Club	The draft management plan specifically and unfairly discriminates against people in their own vessels, but correcting this would be very straightforward. A model of a management system for visitors in private craft is provided by the Atlantic Islands National Park in Spain, which comprises a number of small islands in Galicia.  A system like this allows for strict control of visitors arriving in private craft, it works extremely well, and a similar system, much simpler and more easily policed, could easily be adopted for Sceilg Mhichíl. A daily allocation of four extra people, over and above the 180, would meet all needs, and would be taken up perhaps ten to twenty times a year; an increase of 0.5% or less in the footfall. Individual leisure vessels could be limited to one visit per year.	Response as above.

Consultee	Summarised Comment	Response
Irish Cruising Club	<p>A yacht permit system for Sceilg Mhichíl could include, if necessary, a requirement to spend two and a half hours ashore, as applies to ferry passengers; a separate application to climb the south peak; and an acknowledgement that the safety rules have been read online and understood.</p> <p>Incidentally the lower lighthouse on the Sceilg has not been decommissioned but is still a fully-operational and important aid to navigation. A more appropriate description is that the lighthouse property has been consolidated to the light itself, and the ancillary buildings such as the former keepers' houses are being repurposed.</p>	Response as above.
Irish Wildlife Trust	Did not provide a response.	-

**Table 2-2 Public responses to the SEA ER, NIS and Management Plan**

Public Observation	Summarised Comment	Responses
PO1	<p>Public Observation 1 outlined the following key points which require a response:</p> <ol style="list-style-type: none"> <li>1) The Proposed Plan is vague on the appropriate limit on visitor numbers to the site.</li> <li>2) Those with only a casual acquaintance with their destination now regularly want to see the island. Recent visitors have been unprepared for the climatic conditions and dangerous nature of the site. This means that a contingent of visitors arrives unprepared, and at risk.</li> <li>3) The island's isolation has ensured the integrity of the "wilderness" area of Skellig Michael. The inherent isolation of Sceilg Mhichíl is at risk.</li> </ol>	<ol style="list-style-type: none"> <li>1) It is confirmed that the daily limit is still set at 180 visitors per day. This limit will be assessed through the lifespan of the Plan to ensure it remains sustainable.</li> <li>2) Safety of staff and visitors is of paramount priority in terms of the management of the World Heritage Site and under commitments within the Plan. Protection of the Outstanding Universal Value of the site remains our highest objective and governs the entire approach to the island, in terms of visitor access and conservation.</li> </ol>

Public Observation	Summarised Comment	Responses
	<p>4) No action should be undertaken which might in any way interfere, directly or indirectly, with the wilderness of the site.</p> <p>5) Without a “hands off” except as a last resort philosophy Skelligs risks the loss of the “intangible”. In caring for the island, we must do everything possible to keep this from happening, to minimize all our activities except those required to preserve the intangible, and to ensure that those who visit are acutely aware and pro-active, with regard to the fragility of the site, and the special balance that is necessary to sustain this fragility.</p> <p>6) The protection of Sceilg Mhichíl as a wilderness site needs to be inscribed as a core principle of the Proposed Plan and a clear directive made, that these concerns should inform every single management action with regard to the island.</p> <p>7) There is not enough space for the planned use of the lighthouse complex to accommodate guides, work staff, visiting researchers and others. There needs to be dialogue between those required to live on the island and those making plans for the adaptation of the building.</p> <p>8) Opposed to the addition of toilet facilities in the lower lighthouse complex, due to its proximity to the compact living quarters and distance from the pier on health and safety grounds. Disposal of waste and the lack of running water for sanitation on the island is an issue.</p> <p>9) The toilet facilities provided on the visitor boats are still the best way to provide facilities for visitors.</p> <p>10) There should be guide representation on the management teams responsible for the island.</p>	<p>3) Protection of the Outstanding Universal Value of the site remains our highest objective and governs the entire approach to the island, in terms of visitor access and conservation.</p> <p>4) Protection of the Outstanding Universal Value of the site remains our highest objective and governs the entire approach to the island, in terms of visitor access and conservation. The new Plan contains significant new timebound commitments in terms of protection of the site through monitoring and commitment to change practices as necessary if required.</p> <p>5) See above response (bullet number 4).</p> <p>6) The protection of Sceilg Mhichíl as a wilderness site is a key principle of the Plan, as detailed in the numerous Actions and Objectives that provide protections for the site.</p> <p>7) The plans for reuse of the lighthouse complexes are at an early stage and at all times in project design the sustainability and appropriateness of reuse will guide the process, safety of staff being of the highest priority and input of the guide team will form part of the design process. OPW have already committed, in dialogue with staff interests, to a full discussion about the accommodation provision.</p> <p>8) In terms of the provision of toilets, the issue of hygiene and waste disposal are being addressed, recognising the unique logistical challenges posed on the island. The lack of public toilet facilities on the island has been identified as a challenge in the previous Management Plan and in successive engagements with UNESCO. Given the physical environment, there have been difficulties over the years in providing facilities and the Lighthouse represents the best available option. Temporary toilets are being provided in the short term at the helipad.</p> <p>9) See above response.</p>

Public Observation	Summarised Comment	Responses
		<p>10) OPW considers that it is adequately represented through the existing senior management structure of the SMIG and Guide representation is not necessary. Operational management issues will continue to be addressed with direct involvement of the island teams directly as appropriate on a task/issue basis.</p>
<p>PO2</p>	<p>Public Observation 2 outlined the following key points which require a response:</p> <ol style="list-style-type: none"> <li>1) Refutes the statement in the NIS that:“ It has not been determined what level of visitor numbers is sustainable for avoidance of adverse effects”.</li> <li>2) Commitment to adequate monitoring and assessment should be made in the Proposed Plan to ensure the establishment of Conservation Objectives for Skelligs SPA is achieved.</li> <li>3) Would welcome stated intentions in the draft documents that a proper study would be conducted which would need to be comparable to the previous 7 year period of daily monitoring and assessment.</li> <li>4) Current permitted maximum visitor number may be excessive, should be reduced.</li> <li>5) Concerned that the current permitted maximum number of 15 boat permits may be too risky</li> <li>6) Spreading of visitors across each day will result in longer periods of disruption to nesting birds.</li> <li>7) Statement on page 53 of the Proposed Plan is misleading as it refers only to the built heritage and the monument.</li> <li>8) Details further citations on the potential impacts on burrow nesting species, primarily puffin.</li> <li>9) Details the wide range of habitats utilised by nesting birds across the island, and their subsequent potential vulnerability.</li> <li>10) Provides further details on the vulnerability of fledging’s on Sceilg Mhichíl, in particular puffins.</li> </ol>	<ol style="list-style-type: none"> <li>1) The statement 'It has not been determined what level of visitor numbers is sustainable for avoidance of adverse effects' has been reworded on page 59, and additional text added to page 58 which details the origin of the 11,100 average visitor numbers to Sceilg Mhichíl.</li> <li>2) Actions A4.1 and A4.5 relating to developing conservation objectives for Skelligs SPA and continuing to develop the seabird monitoring programme, respectively, have been set clear targets and timescales in the 2020-2030 Management Plan.</li> <li>3) Analysis of visitor numbers and trends against historical trends is a commitment within the Plan. Specific deeper analyses, such as that carried out after 2015 filming and including the yearly conservation assessment for UNESCO, provide the basis for the particular conclusion cited in the observation and, as indicated, these qualitative assessments will continue to be undertaken in the lifetime of the Plan.</li> <li>4) As per Action 6.6 of the Management Plan, the sustainable level of visitor numbers permitted on Sceilg Mhichíl will continue to be reviewed and amended where necessary. The current permitted numbers will not be increased over the lifetime of the Management Plan.</li> <li>5) The 15-permit limit will not be extended for at least the lifetime of the Management Plan. Action 6.6 will ensure that the</li> </ol>

Public Observation	Summarised Comment	Responses
	<p>11) "Details how the protective wall which runs the length of the island can obstruct birds from re-launching, placing them in danger. It is appropriate to maintain a policy of carefully managed access with minimum imposed infrastructure.</p> <p>12) Details the vulnerability of fledglings in the waters surrounding Sceilg Mhichíl, in particular from passing boats.</p> <p>13) Details the times outside of morning and dusk that birds raft in the waters surrounding Sceilg Mhichíl, and disturbance of seals and cetaceans from boat traffic.</p> <p>14) It is necessary to manage the number and frequency of boat trips around Sceilg Mhichíl which are already operating at a high level of intensity and are contributing to cumulative noise impacts in the vicinity of both islands. There should not be an increase in the number of vessels taking tourists on trips around Sceilg Mhichíl.</p> <p>15) Highlights locations of increased disturbance on the island and potential sites of future vulnerability.</p> <p>16) Details Manx shearwater nests in the monastery of Sceilg Mhichíl.</p> <p>17) Helicopter exclusion zone should be 1km from outside the perimeter of the entire designated Nature Reserve including Sceilg Bheag.</p> <p>18) Details the two previous starving seasons where the primary food source disappeared. Should be serious about protecting the nesting colonies where possible.</p> <p>19) An independent objective plan for management of Sceilg Mhichíl, based on the 'hands off' principle, should be a starting point for decisions regarding the site.</p> <p>20) No additional infrastructure or human activity should be permitted at present unless shown to be unavoidable or known not to be causing harm.</p> <p>21) Obligations in previous plans have not been upheld, Appropriate Assessments not completed previously which led to significant effects.</p> <p>22) Welcomes commitment to monitoring, should be non-invasive and independent.</p> <p>23) Management of the site should be independent in all contexts.</p>	<p>sustainable total number of visitors allowed is regularly reviewed, allowing for comparisons over a multi-year timescale to be made.</p> <p>6) While the spreading of visitors across each day could result in longer periods of disruption to nesting birds, by reducing the pressure on overcrowding, and thus the potential for visitors to stray from the designated pathways and negatively affect typically undisturbed nesting habitat, any potential impact that spreading visitors out over the course of the day will be negated.</p> <p>7) This statement (now on Page 55 of the of the Plan) has updated as per following statement: <i>Having assessed the position on a continuing basis, the management team is satisfied that there was no measurable permanent material damage to the island environment or degradation of the built heritage.</i></p> <p>8) The Actions of the Management Plan and mitigation measures outlined in the NIS aim to reduce the disturbance to species on Sceilg Mhichíl. Prey availability in the waters surrounding Sceilg Mhichíl will not be influenced by the Management Plan, and as such was not considered in the NIS.</p> <p>9) Mitigation measures to protect birds nesting within the range of habitats on Sceilg Mhichíl have been proposed. These include measures M2 and M3 which ensure any plans/projects on the site are subject to ecological assessment, and if required site-specific mitigation measures. In addition, measure M4 provisions for an ornithologist to ensure that burrow entrances remain accessible to breeding birds, (in particular storm petrel), with the objective of maintaining/increasing the net amount of potential breeding chambers in the walls overall, which are subjected to maintenance works.</p> <p>10) Further detail regarding the vulnerability of fledgling puffins leaving the nest during the day has been added to Section 4.1.2.3 of the NIS.</p>

Public Observation	Summarised Comment	Responses
	<p>24) All current proposed plans and initiatives should remain at the level of what is minimally necessary</p> <p>25) The precautionary principle should apply to all activities and projects given insufficient information and understanding. All permitted activities and developments should also be kept to a minimum until more extensive information is available particularly with regards to the ecology of Sceilg Mhichíl.</p> <p>26) 'Less is more' approach would be uppermost in relation to preserving and presenting the extraordinary heritage of Sceilg Mhichíl.</p> <p>27) 'Star Wars' should not be a core element of preservation, presentation or promotion by the State Body. The principal custodians of the island should not identify with branding of any sort.</p>	<p>11) The point on the potential for birds to become trapped by the protective wall has been used to inform the baseline described in the NIS and can be found in Section 7.1.1.3 of the NIS.</p> <p>We will maintain a policy of carefully managed access with minimum imposed infrastructure, only as required, always aiming for minimum impact as a first priority, and avoidance of any possible harm.</p> <p>12) Young guillemots, sensitivity to boat traffic is described in Section 4.3.3 of the NIS. Further detail based on this comment has been added into this section.</p> <p>13) Section 7.1.1.3 of the NIS states that Atlantic puffin and common guillemot typically raft in large numbers at dusk as opposed to during the day. While it is accepted that some birds will raft during daylight hours, as the typical behaviour of these species is to raft outside of daylight hours they will not be significantly affected by vessels sailing around the island.</p> <p>In addition, mitigation M9 of the NIS is aimed at reducing the potential disturbance of wildlife from boats sailing around the Skelligs.</p> <p>14) There is currently no permit system in place for boats taking tourists around the Skelligs, with such a system being out of the jurisdiction of NMS.</p> <p>15) These vulnerabilities will continue to be monitored under Action 4.5 of the Management Plan and assessed prior to any works/research programmes occurring in their vicinity, under Mitigation M2 of the NIS.</p> <p>16) Text has been added to Section 4.2.2.3 of the NIS to reflect Manx shearwater being recorded as nesting in up to 5 cells of the monastery.</p>

Public Observation	Summarised Comment	Responses
		<p>17) The 1km exclusion zone for aircraft is set from the boundary of Skelligs SPA, so includes both Sceilg Mhichíl and Sceilg Bheag, along with the waters in-between and surrounding them.</p> <p>18) The Actions of the Management Plan and mitigation measures outlined in the NIS will fulfil the role of the management plan to maintain/enhance the favourable conservation objectives of Skelligs SPA. The monitoring framework detailed in the SEA ER has been incorporated into the Final Plan, providing a robust set of targets, indicators and timescales to ensure the Actions of the plan are implemented.</p> <p>19) The Actions detailed in the Management Plan do not solely consider the mitigation of commercial activities on Sceilg Mhichíl. Instead, they cover a wide range of objectives to ensure the overall environment of the site can continue to be utilised by not only visitors but the numerous plants and species that reside there.</p> <p>20) Any developments or programmes on Sceilg Mhichíl are required to undergo an environmental assessment prior to their undertaking, as per Mitigation M2 of the NIS.</p> <p>We will maintain a policy of carefully managed access with minimum imposed infrastructure, only as required, always aiming for minimum impact as a first priority, and avoidance of any possible harm.</p> <p>21) In the challenging environment of Skellig, we strive to continue to improve our management and new timebound commitments within the Plan will assist us with that.</p> <p>22) The current monitoring programme being undertaken by NPWS will result in the publication of detailed conservation objectives for each designated species present on Sceilg Mhichíl. These objectives will allow for independent and further informed assessments to be made for any potential activities on the island.</p>

Public Observation	Summarised Comment	Responses
		<p>23) Management of Sceilg Mhichíl is the responsibility of DHLGH and OPW with the aim to protect the OUV of the World Heritage Site. Stakeholder engagement is of course essential in terms of the management of the site, in line with UNESCO Operational Guidelines and issues will be heard by such stakeholders though these in no way distract from the prime objective of the Management Team.</p> <p>24) Visitor access to the site will not be expanded over the lifetime of this plan. Visitor access to the site and areas where they are allowed to enter will continue to be strictly limited and controlled. All current and future works on the island have/will be subject to environmental assessment prior to their approval as per Mitigation M2 of the NIS.</p> <p>25) Any activities and projects on Sceilg Mhichíl are required to undergo an environmental assessment prior to their undertaking, as per Mitigation M2 of the NIS. As such, any activities and projects follow the precautionary principle.</p> <p>Due to the WHS status of the site, it is currently policy that novel infrastructure should only be introduced if required Any developments or programmes on Sceilg Mhichíl are required to undergo an environmental assessment prior to their undertaking, as per Mitigation M2 of the NIS</p> <p>26) The 'do nothing' category assessed in the SEA is not intended to mean do nothing in terms of projects, activities or developments on the island. 'Do nothing' in the context of the SEA on the Sceilg Mhichíl Management Plan asks whether a suitable alternative to the management plan is to have no plan. Due to the status of the site as a UNESCO World Heritage Site, the 'do nothing' approach is not permitted, as it is a requirement that such a designated site includes a detailed management plan. Due to the WHS status of the site, it is currently policy that novel</p>

Public Observation	Summarised Comment	Responses
		<p>infrastructure should only be introduced if required. Any developments or programmes on Sceilg Mhichíl are required to undergo an environmental assessment prior to their undertaking, as per Mitigation M2 of the NIS.</p> <p>27) NMS and OPW do not identify with or participate in any 'Star Wars' branding associated with the island. The Skellig Coast Visitor Experience Development Plan (published by Fáilte Ireland in 2016), when referring to 'Star Wars', details the desire to engage 'Star Wars' fans with the history of the site itself. The 'Star Wars' connection itself is not a core element of the tourism plan for Sceilg Mhichíl or the surrounding area.</p>
PO3	<p>Public Observation 3 outlined the following key points which require a response:</p> <ol style="list-style-type: none"> <li>1) Had expected, as previously provided an observation on the 2009 plan to be personally informed of November 2020 consultation period opening.</li> <li>2) Pleased that visitor levels will not be raised.</li> <li>3) Raised concerns over Fáilte Ireland's involvement in the sites management.</li> <li>4) Raised concerns over the rates charged by boatmen for trips to Sceilg Mhichíl and that the Proposed Plan does not address the issue.</li> </ol>	<ol style="list-style-type: none"> <li>1) All interested parties including stakeholders and the public were notified of the consultation through the same formal process. This included public advertising in a wide-reaching newspaper to the plan and online notification via <a href="https://www.worldheritageireland.ie/">https://www.worldheritageireland.ie/</a>. It would not be appropriate for the Department to use details acquired for the purposes of the 2019 Consultation to make further contact with respondents.</li> <li>2) Noted</li> <li>3) Management of Sceilg Mhichíl is the responsibility of DHLGH and OPW with the aim to protect the outstanding universal value of the World Heritage Site. Stakeholder engagement is of course essential in terms of the management of the site, in line with UNESCO Operational Guidelines and issues will be heard by such stakeholders though these in no way distract from the prime objective of the Management Team.</li> <li>4) The pricing of boat trips to Sceilg Mhichíl is a commercial matter outside the remit of the Department or OPW and does not fall under the jurisdiction of the Management Plan.</li> </ol>

Public Observation	Summarised Comment	Responses
PO4	<p>Public Observation 4 outlined the following key points which require a response.</p> <ol style="list-style-type: none"> <li>1) Major concerns about the safety of the Upper Lighthouse.</li> <li>2) Registers disappointment that the archaeological publication does not seem to be making much progress.</li> </ol>	<ol style="list-style-type: none"> <li>1) Safety of staff and visitors to the island is the highest shared priority of the OPW and the Department and underlines all interventions on the island.</li> <li>2) We acknowledge delay in the publication of archaeological work on Skellig. It is the intention to procure such services in Q1 2021.</li> </ol>
PO5	<p>Public Observation 5 outlined the following key points which require a response:</p> <ol style="list-style-type: none"> <li>1) Had expected, as previously provided an observation on the 2009 plan to be personally informed of November 2020 consultation period opening.</li> <li>2) Pleased there will be no increase in the number of visitors permitted on Sceilg Mhichíl.</li> <li>3) The statement 'visual-aesthetic integrity – the iconic image that has been retained' is limited and should be expanded to specifically include a cultural dimension that is independent of the visual/aesthetic.</li> <li>4) Believes the minimum time allocation for visitors should be increased from 2.5 to at least 3 hours.</li> <li>5) Suggests a price control on boat trip to Sceilg Mhichíl should be introduced.</li> <li>6) Raised concerns over Fáilte Ireland's involvement in the sites management.</li> <li>7) Believes other monastic sites in the area should be made accessible to visitors so that the monastic site on Skellig Michael is seen in its wider context.</li> <li>8) The Proposed Plan could be expanded to include, as well as research in the ordinary sense, artistic elements such as writers, musicians, visual artists and others.</li> </ol>	<ol style="list-style-type: none"> <li>1) All interested parties including stakeholders and the public were notified of the consultation through the same formal process. This included public advertising in a wide-reaching newspaper to the plan and online notification via <a href="https://www.worldheritageireland.ie/">https://www.worldheritageireland.ie/</a>.  It would not be appropriate for the Department to use details acquired for the purposes of the 2019 Consultation to make further contact with respondents.  We regret lack of previous acknowledgement and we trust through recent widely publicised consultation that you will see a willingness on the part of the Management Team to garner views from the public and all interested parties, which we welcome.</li> <li>2) Noted</li> <li>3) In the long-term objective to protect, conserve and promote an appreciation of the Sceilg Mhichíl WHS, we embrace all aspects of the heritage of Sceilg Mhichíl, tangible and intangible. Branding of the World Heritage Site as a 'Star Wars' filming location has never been, nor ever will be an objective of the Department.</li> <li>4) OPW acknowledges the need to ensure that visitors are allowed to spend time navigating the site properly and without undue time pressure. This has been factored in the form of a minimum 2.5 hour visit and this is considered sufficient to allow a full traverse of the site. This will be kept under review, particularly</li> </ol>

Public Observation	Summarised Comment	Responses
		<p>having regard to the future addition of the Lighthouse building to the visit experience.</p> <p>5) The pricing of boat trips to Sceilg Mhichíl is a commercial matter outside the remit of the Department or OPW and does not fall under the jurisdiction of the Management Plan</p> <p>6) Management of Sceilg Mhichíl is the responsibility of DHLGH and OPW with the aim to protect the OUV of the World Heritage Site. Stakeholder engagement is of course essential in terms of the management of the site, in line with UNESCO Operational Guidelines and issues will be heard by such stakeholders though these in no way distract from the prime objective of the Management Team.</p> <p>7) One of our objectives is to establish a visitor centre on the mainland which will enable the telling of the story of the rich heritage of the region in an exciting and accessible format. One of the aims will be to manage any pressures on the island and to disperse visitors to other key sites in the locale.</p> <p>8) Access to the island as a source of creativity and artistic endeavour has been enabled and we will continue to facilitate such when feasible, against the obvious logistical constraints. Additionally, the proposed new Visitor facility to be provided at Portmagee will, as part of its remit, seek to engage in appropriate outreach to the artistic community and provide support for local artists.</p>
PO6	Suggested inclusion of Voices at the World’s Edge: Irish Poets on Skellig Michael (Dedalus Press, 2011) in the bibliography included in the draft plan.	Comment noted, however, as the work is not referenced in the Plan it has not been included in the bibliography.