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Comment on “Þjóðgarðar og önnur friðlýst svæði – lykilþættir”

Icelandic National Parks and other protected areas encompass places among those that I value and cherish the most in Iceland. I am an outdoor enthusiast enjoying travelling and exploring these places in my free time – usually hiking or sightseeing, but I also had the privilege to share this pleasure with foreign guests as a guide for past few years. As a geographer at the University of Iceland, I had the opportunity to work on an assessment of trail conditions in some of these places, while my research focused on the social acceptance of nature conservation in Iceland. My comment here only reflects my personal opinion, based on my background and experience, and does not represent the institution or companies to which I am attached.

General comment:

The document presents a good overview of the issues at stake and highlights potential solutions to these problems but could benefit from a clarification on the purpose of this document and more elaborated recommendations instead of general guidelines.

1 - Stjórnskipulag stofnana og samræming stjórnsýslu

I don't feel qualified to comment on this section.

2 - Merkingar og upplýsingarmiðlun

Simplifying and coordinating signage and information platforms is beneficial, but I don't think that trail markers or direction signs should be replaced by a single design/system, as I don't trust that this would be done with material and designs that are well suited to the character of the areas. Different materials and systems can be used for different areas.

Regarding the symbology of maps, I would recommend a similar design as what is being used by Vatnajökull National Park, with a basemap from Fixlanda ehf. and a consistent color-coding system. Printed version should be available on a more durable support (i.e. water resistant, such as those produced by Nordeca in Norway)

The comment that some signs can be discouraging/dissuasive/repulsive/unwelcoming (about visitor fees) isn't necessarily related to the design of the sign than it's content itself. Entrance fees are not popular, even when disguised as parking fees.

3 - Fjármögnun og gjaldtaka

I agree that there is a need for a holistic fee collection policy in Iceland, though I would prefer not to have any entrance fees, parking fees and toilet fees would for the following reasons:

- Equity between those who can afford and those who cannot.
- Fairness between those who pay and those who never do.
- There shouldn't be any financial gain from not using toilets.

Accordingly, protected areas' operation should be financed by tax revenues from tourism as research has been shown that these outweigh many times conservation costs.

4 - Efnahagsleg áhrif

I agree that tourism in protected areas provides economic benefits for the local community, beyond the boundaries of the protected area. Tax revenues from visitor expenditures and tourism companies should therefore largely cover for conservation costs.

There is also an urgent need to reduce the "leakage" of economic benefits made by companies based in a different municipality or countries than the one they operate in. I don't know how this should be done, but overall, local benefits of tourism should be optimized. Regarding the operations of foreign companies and leakage of all related taxes (including on salaries), it is critical to control that workers are paid according to wage agreement (even if they are hired abroad, according to the Act 45/2007 on Posted Workers) to prevent social dumping and make it more viable to hire locally.

5 - Uppbygging Innviða á Friðlýstum Svæðum

I would like to clearly emphasize that the design of tourist infrastructure needs to be as minimalistic as possible, blend well in the landscape and use local or natural materials and techniques along with traditional architectural styles. There are too many examples of tourist sites designs using overly intrusive artificial structures (viewing platforms, visitor centers).

A good example of sensible hiking trail design can be found in the work done for the past ten years in Þórsmörk by the trail teams, which could be used elsewhere too.

Dry-wall techniques (e.g. by Krísuvíkirkirkja), turf house designs (e.g. Fjalladýrð at Möðrudalur), wooden (e.g. Gamlabúð in Höfn í Hornafirði) or corrugated iron house designs (e.g. Nýr miðbær á Selfossi) could also be used for visitor centers and related constructions.

6 – Viðhald Nátturulegra Gæða Friðlýstra Svæða

I would like to emphasize the importance of managing tourist flows to preserve domestic visitation. It is indeed important that protected areas do not lose their character, authenticity, natural quality and attractiveness for domestic users. It is therefore important to consult domestic users to know how to preserve the area for them as well. This is what I have done for the Highland of Iceland and found that most people want the number of tourists in the area to be limited. I would therefore suggest that road access to the Central Highland should not be further improved to keep the visitor numbers reasonable, especially in the southern Highland (Fjallabak area). Projects of upbuilt roads, paved roads, bridges, and walking bridges can have a negative impact on how these places are experienced.

7 - Lagaumgjörð

I overall don't feel qualified to comment on this section.

Regarding the collection of fees to develop infrastructure, I would like to emphasize that building infrastructures should not be a goal in itself unless such infrastructures are particularly needed.

8 - Kortlagning óbyggðra víðerna.

One of the issues with the application of wilderness mapping work in land-use planning is that it tends to lead to zoning of wilderness versus non-wilderness areas while the reality is more nuanced, with various degrees of wilderness qualities. There is a need to actively involve experts from that field when defining policies based on the interpretation of these maps for planning purposes.

9 - Almannaréttur

I agree with the need for clarification of the almannaréttur in regard with the existing law.

I would like some of the principles of Almannaréttur to be more present in protected area management, such as the provision of rights which come along with responsibilities (e.g. to not damage the land, etc.).

It would be interesting to provide space for more flexibility in outdoor recreation management in protected areas, by creating some sort of recreational permit system (free of charge), which could allow certain uses under conditions, while keeping track of the applicant/user, making it responsible/accountable. As an example, someone could plan an overnight stay outside of a designated camping area and use an online form to provide further info on the planned location and receive additional information or conditions. Another example could be for the use of drone where footage could be collected at the same time in a database for scientific research (e.g. to monitor glacier recession).

10 - Aðkoma Nærsamfélaga

11 - Byggðamál og Atvinnuuppbygging

12 - Sjálfbóðaliðar

13 - Öryggi Ferðamanna og Starfsmanna

14 - Vegaskrá um Vegi í Náttúru Íslands og Akstur Utan Vega

15 - Komur Skemmtiferðaskipa

16 - Umsjón Vega á Friðlýstum Svæðum

Thank you for your considerations,

Michaël Bishop