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**Subject: Permit for cinematography within the protected areas of Dyrhólaey, Geysir, Gullfoss, Goðafoss, Skógafoss, Mývatn, Hverfjall and Dimmuborgir.**

The Environment Agency of Iceland has received an application from Mohammad Bhebehani, dated 22. July 2021, for cinematography within the protected areas of Dyrhólaey, Geysir, Gullfoss, Goðafoss, Skógafoss, Mývatn & Laxá, Hverfjall and Dimmuborgir.

The applicant also mentioned Reynisfjara, Fjarðargljúfur and Fagradalsfjall in the application. These locations are not under the supervision of the Environment Agency. Regarding these areas the applicant needs to contact the landowner or municipality of the area.

**Dyrhólaey** is protected as a nature reserve, cf. regulation no.101/1978. Construction work and disturbance to geological formations and wild animal life in the protected area is prohibited. A permit from the Environment Agency is needed for camping inside the nature reserve. This includes tents, motorhomes and campers.

**Geysir** is protected as natural monument, cf. regulation no. 660/2020. All disturbance of geological monuments is prohibited, incl. any inscriptions and disturbance of the activity and water level of the hot spring area, disturbance of hot springs, hot springs, soils and rocks, without permission. Helicopters and other manned aircraft may not land within the area without the permission of the Environment Agency. Operating an unmanned aircraft/drone within the protected area is subjected to a permit from the Environment Agency of Iceland.

**Gullfoss** is protected as a nature reserve, cf. regulation no. 141/1979. Disturbance to geological formations, vegetation and wild animal life is prohibited. Operating an unmanned aircraft/drone within the protected area is subjected to a permit from the Environment Agency of Iceland.

**Goðafoss** is protected as natural monument, cf. regulation no. 1261/2011. Disturbance to vegetation, wildlife and geological formation is prohibited. Operating an unmanned aircraft/drone within the protected area is subjected to a permit from the Environment Agency of Iceland.

**Skógafoss** is protected as a natural monument, cf. regulation no. 477/1987. Disturbance to geological formations, vegetation and wild animal life in the protected area is prohibited. Camping overnight is only allowed in a designated campsite. This includes tents, motorhomes and campers. Photography, cinemaphotography and events that can affect visitors experience in the area are subjected to a permit from the Environment Agency of Iceland.

**Mývatn and Laxá** area is protected according to act no. 97/2004. Permission from the Environment Agency of Iceland is needed for construction work and all activity that can affect wildlife, geological formations, vegetation and landscape in the area.

**Hverfjall** is protected as a natural monument, cf. regulation no. 1261/2011. Disturbance to vegetation and wildlife is prohibited. The guest should follow marked paths at any given time.

**Dimmuborgir** is protected as a natural monument, cf. regulation no. 1262/2011. Disturbance to geological formations, vegetation and wild animal life in the protected area is prohibited. Events and commercial filming is subjected to a permit from the Environment Agency of Iceland.

A separate application needs to be made to the Vatnajökull National Park authority.

***Description of the project:***

The project is personal photography of Iceland's natural wonders. On a road trip around the Ring Road, the licensee plans to see most of the main attractions and natural wonders in Iceland and capture footage with a DJI Drone (Model: Mini, less than 250 gram weight). Footage captured is not going to be used for commercial reasons. For all locations, the flight time will be kept to the absolute minimum amount of time possible, each flight will take approximately 5 minutes and a maximum time of 20 minutes. For all locations, the flight path will be at an altitude between 10 meters and 120 meters above ground/sea level. For areas where there are people or potentially high winds, or for areas where there may be rough conditions (for example waterfalls), or for areas where there are special minimum height requirements the minimum height will be increased to be at least 30 or 50 meters above ground, as required. Special precautions will be taken for potential disturbance to birds and other wildlife. The potential for high winds will be taken into account.

The drone will be kept in the operator's sight at all times. There will be no disturbance of geological features. No plants, wildlife or other living or non-living organisms and objects will be touched or moved. The drone will be further than 200 meters away from all birds and other animals at all times. The drone will not land on or touch any moss or any other fauna.

***Review:***

In accordance with art. 25. in regulation 665/2012 the Environment Agency of Iceland requested a review from the Icelandic Institute of Natural History and the Lake Mývatn Research station on 23. July 2021.

The review from the Icelandic Institute of Natural History was received on 23. July. In their review the Institute emphasizes that although the breeding season is mostly over in August, large groups of ducks, many with ducklings, will be on site in many places on Lake Mývatn and there is some risk that these groups or individual birds may be frightened if drones come too close. Therefore, the operator of the drone must be very careful and avoid flying the drone over these bird groups and keep at least 200 meters away. Avoid flying over places where birds could hide, e.g. in lush bays where there is a lot of shelter. Drone flying should be stopped if birds are frightened or in motion, e.g. when groups of birds are in flight. The noise of the drone should be reduced as much as possible.

The review from the Lake Mývatn Research station was received on 30. August. In their review the research station does not object to drone flights at the locations mentioned within the Mývatn area.

***Impact assessment:***

The Environment Agency of Iceland considers the project not likely to have lasting negative impact on the conservation value of the protected areas. Many of the areas listed are important bird habitats and special care must be taken during the drone flights not to disturb birds or other animals. The drone flight could have a temporary negative effect on bird life and the project might disrupt and have negative impact on the experience of other guests at these locations. It is extremely important that the licensee complies fully with the conditions set out here below and follows the rules of the Icelandic Transport Authority regarding the use of drones.

***Conclusions and conditions:***

The Environment Agency of Iceland hereby grants Mohammad Bhebehani permission on its behalf for cinematography within the protected areas of Dyrhólaey, Geysir, Gullfoss, Goðafoss, Skógafoss, Mývatn & Laxá, Hverfjall and Dimmuborgir as described above on the 5. - 13. August 2021, on the following conditions:

- Keep this letter with you on site during the project.
- The licensee shall inform rangers in the areas about their arrival and departure. This is to be done no later than 24 hours before entering the area and again before leaving it.
- If the project dates or description changes, the Environment Agency shall be notified as soon as possible.
- The licensee should always stay on authorized paths/tracks/roads.
- The licensee must take great care not to break geysirite at the Geysir area.
- The licensee must follow rules of conduct that apply to the area.
- Every measure must be taken not to cause damage to the site and limit the size of the filming site.
- All traces of the project must be removed when the project is over and all litter must be removed from the sites.
- The licensee should be conscious of other guests on the sites and make sure that filming causes as little disturbance as possible to other visitors. If the material is meant for public viewing it must be noted in the video/subtext that permission from the Environment Agency was obtained for the filming/photography.
- An unmanned aircraft should never be flown in close proximity to people. Please take precaution not to disturb people's experience, their safety or personal privacy nor the general peace of the protected areas being filmed.
- According to Icelandic law it is forbidden to fly close to cliffs where birds nest. An unmanned aircraft should never be flown near animals or birds, neither in nesting areas nor during nesting season or any other seasonal time when animals or bird habitats are considered vulnerable.
- Flight time should be kept to a minimum and flight should be avoided during the area's busiest times of the day.
- At Mývatn & Laxá the operator of the drone must be very careful and avoid flying the drone over bird groups, keep at least 200 meters away from bird groups and avoid

flying over places where birds could hide, e.g. in lush bays where there is a lot of shelter.

- If the use of unmanned aircraft causes disturbance to wildlife in the area, its use should be ceased at once.
- The conductor of the unmanned aircraft is responsible for the aircraft within the protected area. This includes taking responsibility of any possible risk of harm to people, fauna and nature and leaving no permanent marks on the site in question. Should the aircraft crash, all components from it must be collected and removed from the area.
- For safety reasons, the pilot of an unmanned aerial vehicle must wear marked clothing so that the person can be identified.
- **It is forbidden to fly over Strokkur in altitudes below 50 meters.**
- **It is forbidden to fly drones in the canyon in front of the waterfall at Skógafoss.**
- It is forbidden to fly drones next to bird cliffs in a closer proximity than 200 meters during nesting season. For rest of the year it is not allowed to fly in a closer proximity to bird cliffs than 50 meters, if birds are in the cliffs.
- All disturbance to animals and wildlife is strictly prohibited.
- Off-road driving in Iceland is strictly prohibited.
- If travel toilets are used within the sites, to disposal of the contents should done in authorized discharge site outside the protected area.

If the licensee causes damage to nature, the Environment Agency of Iceland can, according to art. 87 in the Nature Conservation Act no. 60/2013, order the licensee to fix damage to nature and vegetation and/or stop the project.

The Environment Agency of Iceland can according to art. 89 in the Nature Conservation Act no. 60/2013 change conditions of the permit, add new conditions or withdraw the permit in order to prevent damage to nature if environmental conditions change.

According to art 89. in the Nature Conservation Act no. 60/2013 the Environment Agency can withdraw the permit if conditions of the permit are not complied to.

Unmanned aircraft should take off and land in a safe distance from other visitors according to regulation no. 990/2017 on unmanned aircrafts.

The usage of a drone shall be according to regulation no. 990/2017 on the operation of remotely piloted aircraft (<https://www.icetra.is/aviation/drones/>).

Please note that according to the regulation all drones used for commercial flight need to be registered at the Icelandic Transport Authority.

A permission from the landowners and/or the municipality might be needed for the project.

Regarding all areas applied for, except Mývatn and Laxá, the decision may be appealed to the Ministry for the Environment and Natural Resources according to art. 26 of Act no. 37/1993 on Administrative Procedures, based on Art. 91 of Act no. 60/2013 on Nature Conservation within three months from the date of this letter.



Regarding Mývatn and Laxá the decision may be appealed according to art. 26 of Act no. 37/1993 on Administrative Procedures, based on Art. 11 of Act 97/2004 on protection of Mývatn and Laxá within one month since the applicant knew about the decision.

***Permission fee:***

Environment Agency of Iceland charges a fee for processing applications for permits in protected areas based on Article 92 of Act no. 61/2013 on Nature Conservation. The fee for cinematography and/or photography is 52.600 ISK according to art. 24. b. in the agency's tariff no. 535/2015.

***Supervision:***

The Environment Agency will supervise the project. The supervisor will be a ranger from the Environment Agency.

Sincerely

René Biasone  
advisor

Sigríður Skaftadóttir  
lawyer