

Australian Climbing Association Victoria (ACAV)

Submission to Parks Victoria in response to the

Greater Gariwerd Landscape Draft Management Plan (GGLDMP)



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Australian Climbing Association (Vic) Inc

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Executive Summary and Key Recommendations

We present a summary of our key recommendations in response to the Draft Greater Gariwerd Landscape management Plan (GGLDMP), as it was issued for public consultation in November 2020:

- 1.1 Draft GGLDMP be withdrawn and referred to [Planning Panels Victoria](#) for review.
- 1.2 Adopt the established climbing management strategies presented within the [Victorian Climbing Management Guidelines](#).
- 2.1 Access restrictions to be workshopped through consultation with climbing groups: ACAV, VCC/Cliffcare and Crag Stewards Victoria.
- 2.2 Take a climb-by-climb approach to managing climbing in environmentally and culturally sensitive areas.
- 2.3 A ten metre exclusion zone to be introduced as a default clearance to protect significant cultural locations, such as rock art sites.
- 2.4 Legal set-asides to be sought and legally compliant signage to be installed at each restricted location.
- 2.5 The presence of stone quarrying must not be used as a blanket justification for excluding public access.
- 2.6 Designated rock climbing areas and permit plans to be abandoned.
- 2.7 Safety bolts to be managed and maintained by climbing groups.
- 2.8 Bouldering mats must not be prohibited as they are essential to reduce the risk of injury and death.
- 2.9 Chalk use to be accepted, subject to guidelines.
- 2.10 Proposed ban on new climbing locations to be removed from the GGLDMP.
- 2.11 Off-track walking restrictions to be cancelled to allow off-track walking and the use of game trails.
- 2.12 Parks Victoria to work with Crag Stewards Victoria and Cliffcare to maintain walking tracks and cliff bases.
- 2.13 Bush camping to remain permissible subject to existing conditions.
- 2.14 Parks Victoria to instigate peer reviews of all archaeological surveys conducted in the Greater Gariwerd region over the last two years.
- 2.15 Wherever graffiti occurs in the Grampians/Gariwerd, Parks Victoria must prosecute the perpetrators to the full extent of the law to protect the park.

GGLDMP Review - Introduction

The Australian Climbing Association Victoria (ACAV) is the largest rock climbing organisation in Victoria and the largest in Australia. ACAV was established in April 2019. As of January 2021 we have 583 members.

The ACAV is a representative body for the specific purpose of supporting and facilitating climbing access in Victoria. We aim to promote and protect access to rock climbing in Victoria while being respectful of unique cultural and environmental values.

We are grateful for the opportunity to comment on the draft Greater Gariward Landscape Management Plan (GGLDMP). We have serious concerns with many of the management proposals described in the GGLDMP.

The ACAV strongly believes that the best management approach is to maintain access to as many climbs and bouldering areas as possible. This helps distribute and minimise impacts across a large area of the National Park. By restricting climbing as outlined in the GGLDMP, Parks Victoria would create serious issues, which would become increasingly apparent over time. The most obvious of these is the increased traffic at the small number of climbing locations which remain open. The plan also creates some serious safety concerns, not least due to the fact that implementation of the plan would result in the loss of the safest climbing in the region.

We would like to see a resolution in which all stakeholders are properly consulted. If regulations are clearly explained and understood, compliance will come naturally. However if they are opaque, inconsistent, apparently arbitrary, poorly explained and summarily rolled out, this will result in resistance and upheaval. The more restrictions are put in place, the higher the likelihood that climbing will be forced into an underground activity. We want to help Parks Victoria work with the climbing community to achieve the best possible outcome for all involved. A plan must be put in place that is supportive and collaborative, and which will gain respect and compliance from climbers.

The ACAV would like to see a plan that we can support and which we can encourage our members to support. This Draft Plan will have massive social and economic impacts on the region. It is dangerous. It is a public policy failure.

In regards to rock climbing and bouldering, there are numerous proposals that are entirely untested in such a large area, let alone in combination. Massive restrictions have been proposed for a major user group, with no genuine consultation.

Many of the proposals are completely unnecessary, excessive, counter-productive and, in cases, outright dangerous with a strong likelihood of future litigation against Parks Victoria. This plan would be seriously damaging to the local community; not only the climbing community but also the broader community and the local economy.

The eagerness of the climbing community to work collaboratively with Parks Victoria and Traditional Owners has been ignored. The Draft Plan is quite obviously biased against rock climbers and Parks Victoria has been inconsistent and at times hypocritical (take for example the Grampians Peaks Trail) in regards to its management of cultural heritage and environmental issues in the Greater Gariward region.

Parks Victoria has lost the respect of the broader climbing community throughout its management of this process, and it is unlikely to gain the cooperation of the climbing community for any of the major proposals therein.

The ACAV takes serious issue with the major proposals relating to rock climbing in this draft plan, including the extensive banning of entire climbing areas, the designated climbing areas system and the proposed climbing permit.

Consequently, we recommend that the draft plan should be withdrawn and referred to Planning Panels Victoria for review.



Detailed concerns

Proposed Rock Climbing Bans

The Grampians National Park is internationally renowned for its world-class rock climbing. The ACAV appreciates Parks Victoria's stated intention to continue to support 'a diverse and extensive range of climbing opportunities'. However, the restrictions currently proposed in the GGLDMP fail to do this.

The proposed restrictions unequivocally reduce the breadth and quality of rock climbing across Greater Gariwerd, compromising its reputation and status as a notable and exceptional rock climbing site. Rock climbers familiar with the range, quality and diversity of rock climbing across Greater Gariwerd are unanimous in this assessment. Under the GGLDMP, the vast majority of popular rock climbing across this region has been banned.

Very little quality climbing would remain

At first glance, a significant number of climbing areas remain open under the proposed plan, in keeping with Parks Victoria's intention to support an extensive range of climbing opportunities. However, several critical omissions make the data within the draft management plan misleading.

The GGLDMP currently notes that rock climbing is currently permitted at 86 out of 281 areas listed, with climbing permitted at 31 percent of all climbing areas. In fact there are considerably more climbing areas across Greater Gariwerd, and **the climbs which have been approved as Designated Climbing Areas account for only 20 percent of the rock climbing across Greater Gariwerd**. If the proposals in the GGLDMP were enacted, bouldering would fare even worse, with access allowed to only 6% of bouldering locations.

The website *Save Grampians Climbing* has created [this resource](#) to help explain the impact of the currently proposed restrictions from a climber's perspective.

Ongoing, non-assessed closures

There are 126 climbing areas currently classified as "Possible Climbing Areas (Under Review)". Under the GGLDMP, these will be closed to climbing until assessed. Assessments of this kind requires time, budget and resources, and there is no guarantee when (or whether) this will happen. Given that climbing has occurred at many of these locations for decades, there appears to be no practical reason to ban climbing as we wait for these assessments to be completed.

Popular routes disproportionately affected

On the climbing website TheCrag.com, routes are given a 'three-star rating' for their quality. This includes rock quality, quality of fixed protection, and can be used as a guide for climbers looking for popular, well-travelled routes.

Under the proposed restrictions, 46% of the 'three-star' rated climbs in Greater Gariwerd are permanently closed. A further 32% are closed pending assessment. In total, 78% of the most popular routes across Greater Gariwerd are currently closed.

A more pragmatic approach would be to keep as many popular routes and areas open as possible, as popular routes are:

- More likely to be well-travelled, on good-quality, less friable rock and therefore be safer.
- More likely to have well-maintained fixed protection and anchors.
- More likely to have established, formal access tracks.
- More likely to have hardened areas at the base of the crag, reducing damage.
- Contained areas where any impacts can be limited and mitigated.

Sport climbing disproportionately affected

Sport climbs are protected by bolts, which offer a greater safety margin than climbs which use traditional (removable) protection. Given the choice, many climbers may choose a sport climbing area over a higher risk traditional climbing area. In removing so many sport climbing options, Parks Victoria is impeding on a climber's ability to make this choice, potentially driving climbers towards other, higher-risk climbing areas.

Currently, 24% of sport routes are closed, with a further 46.5% closed pending assessment. In total, 70.5% of existing sport climbs are currently closed, with only **three** out of the **top 50** most popular sport routes (6%) currently open.

Of the top 50 most popular 'hard' sport climbs (grade 26+), a major drawcard for local and international climbers alike, only two remain open, with 23 closed permanently and 25 closed pending assessment.

Bouldering has been decimated

Bouldering is a style of rock climbing that focuses on precision, strength and technique on small, free-standing boulders or at the base of cliffs. Rather than using ropes for protection, boulderers use padded mats which absorb impact when they fall. The maximum distance of fall is generally 4 metres.

Greater Gariwerd is a world-renowned bouldering destination, boasting the [most famous bouldering problems](#) in Australia. Under the proposed restrictions, 94% of all bouldering routes would be closed. In total, 475 problems are designated as permanently closed, with 811 closed pending assessment. Of the most popular, world-famous bouldering problems, none remain.

However, since the plan also absurdly proposes to prohibit the use of safety pads for bouldering, the activity will become so high-risk it will effectively be wiped out.

So despite Parks Victoria's stated intention to continue to support 'a diverse and extensive range of climbing opportunities', what we see is a plan that does the opposite and actually decimates the activity.

A Precautionary Approach

We understand the value of taking a “precautionary approach” to management in the potential presence of cultural heritage values. In 2019, Parks Victoria announced a series of climbing bans across Special Protection Areas and conducted a series of archaeological surveys, to identify cultural places and cultural values in rock climbing areas within the Grampians (Gariwerd) National Park.

These surveys, which covered 125 climbing areas, yielded a total of 37 previously undocumented cultural places, including ‘23 stone quarries, four rock shelter deposits, three potential archaeological deposits, three artefact scatters, three rock wells and one ochre source.’

We note that these surveys did not discover a single occurrence of rock art at these 125 climbing areas.

These assessments have shown incredibly little to no impact on cultural heritage values. For example, as will be discussed below, it is extremely difficult and unlikely that climbers could or would permanently damage stone quarry sites.

We also note that documentation resulting from surveys commissioned by Parks Victoria depicts impacts, such as historical graffiti, which could not possibly have anything to do with rock climbers, and yet climbers are being blamed. Parks Victoria has created a serious credibility issue for itself here. The failure to include representatives from the climbing community in the surveys, as requested, is a serious oversight.

If Parks Victoria hoped that the results of these surveys would demonstrate significant climber interference with cultural heritage values, thereby justifying its “precautionary approach” to management, it has most certainly failed to do so.

The protection of cultural heritage is one thing that we can certainly agree on. However, when Parks Victoria bans entire cliff lines, sometimes hundreds of metres long, due to evidence of stone quarrying in one area, it is quite clear that it is acting far in excess of what is necessary. The ACAV finds this to be a completely unacceptable approach to managing public land.

The ACAV believes that climbs and boulder problems must remain open unless there is shown to be a good reason for them not to be. We note that speculative banning is inappropriate in a National Park.

The GGLDMP proposes to prohibit rock climbing and bouldering everywhere except specifically approved locations which are extremely limited in number. The ACAV rejects this approach to management. It has not been shown as necessary in the Grampians/Gariwerd National Park, and the use of this approach creates many serious problems which will be identified in the following pages.

Designated Climbing Areas

The Draft Plan proposes the following system for classification of cliffs:

- Designated Climbing Areas - green
- Designated Climbing Areas (LTO only) - blue
- Climbing Not Permitted - red
- Possible Climbing Areas (Under Review) - orange

This system does not allow for the necessary fine-grained approach to climbing and bouldering management. The ACAV rejects the proposed Designated Climbing Areas system outright.

A more nuanced, climb-specific approach is required, allowing some climbs to remain open, while other climbs are closed. Climbers are eager to work with Parks Victoria and Traditional Owners to address cultural heritage and environmental impact concerns.

Note that this climb-by-climb approach to protection and management is standard practice at climbing locations within national parks around the world. One such site in Albarracin, Spain (one of the largest global bouldering areas) is a UNESCO World Heritage site and the management practices used to conserve the beautiful Levantine rock paintings have been well balanced with the recreational users of the area. See [here](#) for reference.

The proposal to ban all climbing areas unless they are specifically approved is untested for such a large number of climbing sites spread over such a large geographical area, and the ACAV rejects this proposal. From a climber's perspective it seems punitive, fundamentally unfair and heavy-handed. This labour and resource-intensive management approach will likely be difficult to enforce, and seems unnecessary given climbers' genuine eagerness to collaborate with Parks Victoria and Traditional Owners.

Rock Climbing Permit

The ACAV is opposed to the climbing permit system outlined in the GGLDMP. It is incompatible with the management of crown land set aside for the nation. These areas have been set aside for the people and this principle must be upheld for the sake of future generations.

Our concerns are outlined below:

- Climbers are eager to participate in voluntary cultural and environmental inductions - there is no need to implement a permit system to achieve this outcome.
- The proposed permit system appears inconsistent, as it applies to rock climbing, but not other comparable recreational activities such as hiking, fishing, 4-wheel driving or geocaching. The only other activities requiring a permit are competitive and/or commercial events (car rallies and competitive events).
- A permit system impinges on free and equal access to crown land.
- An online permit system would exclude the less technologically-literate.

- It is difficult to imagine how all climbers would be made aware of the permit system, and unintentional failure to comply could lead to unpleasant confrontations between climbers and rangers. A more collaborative approach would be far more effective at achieving positive management outcomes.
- The permit system raises legal and privacy concerns, which would need to be addressed and potentially tested in court.

Implications for Safety

The ACAV is greatly concerned about many measures proposed in the GGLDMP, which will adversely affect the safety of rock climbers across Greater Gariwerd.

Management of Fixed Protection

Parks Victoria has provided no practical plan for the maintenance and installation of safety bolts. The climbing community has specialist knowledge, and this work has been done voluntarily by climbers for decades. The proposed requirement to apply for authorisation from Parks Victoria before any existing bolts can be removed or replaced is wholly impractical, and would create an impediment to the timely maintenance of these vital safety bolts.

Note that failure of a safety bolt is likely to bring about serious injury or death. Some of the existing mild steel safety bolts in the park are 30 to 50 years old.

If Parks Victoria does not wish to accept full responsibility for assessing and ensuring the integrity of existing anchors, and fails to allow additional safety anchors to be added in certain specific places, then Parks Victoria should not involve itself with this process at all. Any involvement by Parks Victoria would involve taking full responsibility for all risks and potential litigation which might arise from any sub-optimal safety bolts installed.

Climbers have been replacing and upgrading this safety equipment for decades and the specialist knowledge to mitigate future risk should be left entirely in the hands of the climbing community.

Furthermore, the suggestion that the unauthorised placement or addition of anchors will result in the closure of entire climbing areas is wholly unacceptable. This kind of group punishment is inappropriate, and the ACAV rejects this punitive approach. We note that no other user group is subject to such harsh and discriminatory measures.

Impacts of specific restrictions

Under the GGLDMP, nearly 80% of the sport climbing and 94% of the bouldering in Greater Gariwerd would be closed. This represents the vast majority of the safest rock climbing in Victoria.

When managing risk, climbers are constantly making decisions regarding safety, and route selection is an important consideration. The closure of much of the safest climbing in Victoria severely restricts climbers' options when making these safety decisions. The nature of the

proposed restrictions is such that climbers will be funnelled into climbing in areas of poorer quality rock and poor natural protection.

For boulderers, the banning of bouldering pads would seriously compromise safety, leading to accidents, injuries and potentially fatalities.

New Climbing Areas

The Draft Plan proposes an indefinite ban on the development of new climbing areas. This is counter-productive to the goals stated within the Parks Victoria Healthy Parks Healthy People plan: to unlock the power of nature and parks for their preventative and restorative health and wellbeing benefits, and support economic growth and vibrant, healthy communities.

The establishment of new climbing areas after zones of cultural heritage values have been clearly identified will:

- Alleviate pressure on the extremely limited areas where climbing would otherwise be permitted under the GGLDMP.
- Allow climbing to occur in areas where it will not impinge on cultural heritage values.
- Mean that in time, the rock climbing community may return to the region, contributing once more to the regional economy.

The ACAV does not see the development of new climbing areas as a particularly big issue in the scheme of things. Prior to the announcement of climbing bans in 2019, a new climbing area of any significance was probably only discovered once every few years. Most of the good and accessible climbing areas in the Grampians have been documented and climbed upon years ago, and if they were good, they would have become popular well-known areas by now. The development of new climbing areas really only becomes an issue if Parks Victoria instigates extensive climbing bans and as a result climbing is forced underground. When there is extensive closure of documented climbing areas, there may well be climbers who will then look to go off-grid in search of the wilderness experiences. This is a further reason why the closure of popular and established climbing areas is counter-productive.

Aboriginal cultural heritage

Respecting and Reporting cultural heritage

For generations, climbers and boulderers have held a deep respect for cultural heritage in the region. Cultural sites and artifacts have been found, reported and respected. The community has kept away from known cultural sites out of decency and respect. Information has been discreetly shared and behaviour has been self-policed.

This approach fosters universal goodwill and encourages further reporting of any art discoveries that might be made by members of the climbing community. Automatic closure of climbing areas due to the existence of rock art is certainly not encouraging of such reporting and the ACAV recommends against the heavy-handed policing of the national park.

Archaeological Assessment

The ACAV has significant concerns about the veracity of the archaeological assessments of climbing areas that have occurred in recent times. Specifically, we are concerned about a bias against climbers. According to Parks Victoria's documentation, climbers have been deemed responsible for certain impacts, despite there being no evidence of their involvement. In some cases climbers were blamed for impacts they simply could not have been responsible for, for example, [bird guano has been described as climbers chalk](#). We also note that Parks Victoria has contracted archaeologists who have demonstrated a tendency to blame climbers for impacts without just cause.

The ACAV therefore insists that Parks Victoria instigates peer reviews of all archaeological surveys conducted in the Greater Gariward region over the last two years, and that these reviews are carried out by independent archaeologists. Further, any archaeological surveys directly concerning climbing interactions must include attendance by a representative of the ACAV and/or VCC to ensure that appropriate consultation can occur.

Inconsistent approach to regulation

Examination of the GGLDMP reveals that Parks Victoria is being highly inconsistent in its approach to regulation of cultural heritage issues in the Greater Gariward region. For example, walkers seem to have far more of an impact than climbers, and yet they're not subject to the same restrictions.

If climbing areas are going to be shut down for no other reason than that there is a **potential** for harm, the only rational course of action for Parks Victoria has is to immediately close down all walking tracks in the Grampians, where it is clear that serious harm **is already** occurring to cultural heritage on a regular basis. Walking tracks which are of issue include the Hollow Mountain Track, Beehive Falls track, the Wonderland Range tracks, and sections of the Grampians Peaks Trail. This issue has been brought to the attention of Parks Victoria by climbers in the past, yet no action has been taken.

The ACAV considers this continued scapegoating of our activity to be completely unacceptable and we insist that Parks Victoria addresses the threats to Aboriginal cultural heritage fairly and consistently across all activities.

Rock Art

The ACAV acknowledges that Aboriginal rock art has highly significant cultural heritage values, and agrees that serious efforts should be made to ensure its protection and preservation.

Parks Victoria has often used rock art as a justification for closing climbing areas, for example in February 2019, when Special Protection Areas of the park were formally closed to climbing “to protect values, such as rock art and native vegetation.” However, we note that in Parks Victoria’s subsequent survey of 125 climbing areas, **not one single occurrence of rock art was discovered**.

It is therefore unreasonable to keep using rock art as justification for closing climbing areas. Furthermore, if rock art is present at a climbing area, the closure of the entire area may not always be necessary. In some instances rock art near or within established climbing areas could easily be protected through small rock perimeters and interpretive signage. We therefore feel it is unreasonable for Parks Victoria to keep using rock art as a justification for closing climbing areas. We reiterate our request that Parks Victoria adopt a more fine-grained approach to management.



The respected rock art site at The Plaque at Mount Arapiles, protected by a simple small rock perimeter.

Stone Quarries

Stone quarries are where hard rock on the ground, or at the base of cliffs, was chipped to create stone tools in the past. Stone quarrying sites, being hard rock, are incredibly difficult to damage unless done so deliberately, and do not require the same measure of protection as rock art.

Climbing is a minimal impact activity; someone walking near, or climbing in the vicinity of a quarry site could not possibly damage it. Yet some Parks Victoria staff seem to misunderstand the issue. For example, [at a cultural heritage induction at Summer Day Valley](#) one Parks Victoria representative stated that stone quarries were in danger because climbers **may drop generators on them!** This is absurd, as climbers do not use or carry generators around the bush.

The presence of stone quarry sites appears to underlie the closing of many climbing areas. The ACAV believes that the automatic closure of entire climbing areas due to the presence of quarry sites is completely unnecessary, unreasonable and inconsistent. **We note that there is some evidence of pre-colonial, man-made rock breakage at almost every location in Gariwerd where hard rock exists.**

It has most certainly not gone unnoticed by the climbing community that Parks Victoria's management of this issue is both hypocritical and inconsistent. Parks Victoria allows bush walkers to walk across stone quarry sites, indeed some formal tracks established by Parks Victoria **go right over the top of significant quarry sites.** If walking over the top of them can be allowed - and it is - there is simply no justification for banning climbing in their vicinity.



Bushwalkers walking over a significant quarry site on the formal Hollow Mountain track.

Graffiti

Despite some claims in the GGLDMP that “observed impacts included: - deliberate scratching and painting with charcoal, typically on the cliff face at the bases of climbs” (p.102), there is no evidence that this graffiti was inflicted by the climbing community. The GGLDMP has accompanying documentation showing numerous photos of historical graffiti, which also appears to have been blamed on rock climbers. Any suggestion that graffiti can be attributed specifically to rock climbers stretches Parks Victoria’s credibility significantly. The graffiti and other vandalism in tourist areas is staggering. [See also this article by Glenn Tempest.](#)

There are also several examples of graffiti over actual Aboriginal rock art in these tourist areas. The GGLDMP completely ignores these impacts when clearly this is the greatest threat to Aboriginal cultural heritage there is. Why is this being ignored?

The ACAV finds this scapegoating of one activity, our activity, whilst Parks Victoria is ignoring greatly more significant threats to cultural heritage, to be morally repugnant and completely rejects any efforts to ban rock climbing due to graffiti issues.



Graffiti in Hollow Mountain.

Environmental Impact

Off-track walking

In the GGLDMP it is deemed acceptable to allow recreational hiking to occur off-track, and may only be closed where there is a sensitive area identified. However, off-track hiking at Designated Climbing Areas is forbidden.

The ACAV rejects this discriminatory approach, and we have concerns that climbers and boulderers will find this situation untenable in the real world, out in nature. Walking to, in and around a climbing location is no different to hiking off-trail and should be treated as such.

We are aware that in some areas, all park users may need to follow environmental restrictions to control the spread of noxious weeds, algae and fungi. Where there is a sensitive area identified on or near an access track for rock climbing, appropriately signposted in the same manner as suggested for hiking. Where there are protocols in place to reduce the spread of Chytridiomycosis and Phytophthora, this can be communicated and strictly followed by climbing park users.

Chalk

The GGLDMP proposals for managing the use of climbing chalk are impractical, unsafe and potentially harmful. Chalk use is a safety issue, as a climber may fall without warning when hand friction cannot be controlled. The climbing community has established chalk clean-up solutions and has volunteer labour available to regularly clean climbing and bouldering sites that are not washed off by rain.

Camping

We most certainly agree with the importance of leave-no-trace and minimal impact principles, these are fundamental principles for responsible bush camping. However, we do not agree that the restriction of bush camping, as the GGLDMP proposes, is an appropriate management approach in a vast national park like the Grampians. It is unnecessarily draconian and impinges on the public's enjoyment of the natural environment. We also see practical problems arising from the greatly reduced number of camping options.

It appears that Parks Victoria plans to prohibit free bush camping in the national park, while failing to provide any significant number of new authorised camping sites. This is a failure of policy and planning. It is concerning to see the public's connection to the natural environment being severed in this way.

Economic and Social Factors

The ACAV is greatly concerned about the impact the proposed restrictions will have on the climbing community, and the broader community across the Wimmera.

Economic Impact

There has been some unhelpful narrative in recent times dismissing the potential economic impact to the Wimmera should climbing and bouldering become severely impacted under a new management plan. This has been hurtful to the community, as climbers and boulderers are fully aware that the losses would be considerable. Those struggling to maintain employment and businesses in the region feel disrespected and ignored.

A [report](#) has been issued by the [Victorian Climbing Club](#), addressing and quantifying the likely economic impact arising from the loss of climbing in the Wimmera region.

We note the following statements from the introduction:

*“The estimated direct and indirect rock climbing tourism benefits to regional communities in 2018 are **\$12.3 million for Mount Arapiles (Dyurrite)** and **\$11.9 million for the Grampians** (Gariwerd). In the Grampians that’s almost double what the Grampians Peaks Trail is estimated to generate by 2025 (\$6.39 million), the trail itself costing the taxpayer \$26 million and clearing 14.4 hectares of native vegetation.”*

“The economic value of rock climbing is increasingly recognised internationally. This tourism not only provides income and employment but also draws experienced and skilled individuals to regional areas. Labour attraction and retention are critical issues for regional areas in Victoria.”

*“Climbing access changes may also impact the Victorian employment sector. Based on questionnaire surveys **it is estimated that there are 290 individuals seriously considering a move, moving, or have moved**. The IT and professional sectors may be impacted the most across Victoria, however changes may be more greatly felt in regional areas in the health, business and education sectors.”*

Mental Health

Climbing and bouldering are immersive activities that become a way of life for many people. The dramatic loss of these activities across Greater Gariwerd is already impacting the mental health of local communities in particular. The incidence of suicide is of great concern in the region as there are increasing medicated cases of anxiety and depression surrounding the outcomes of this management plan and the future of this recreation in the region.

Healthy Communities

The ACAV recognises the value of spending time in nature. Physical activity has positive outcomes for people’s physical, mental, social and spiritual health and rock climbing is recognised as contributing to a fit, healthy and positively engaged society.

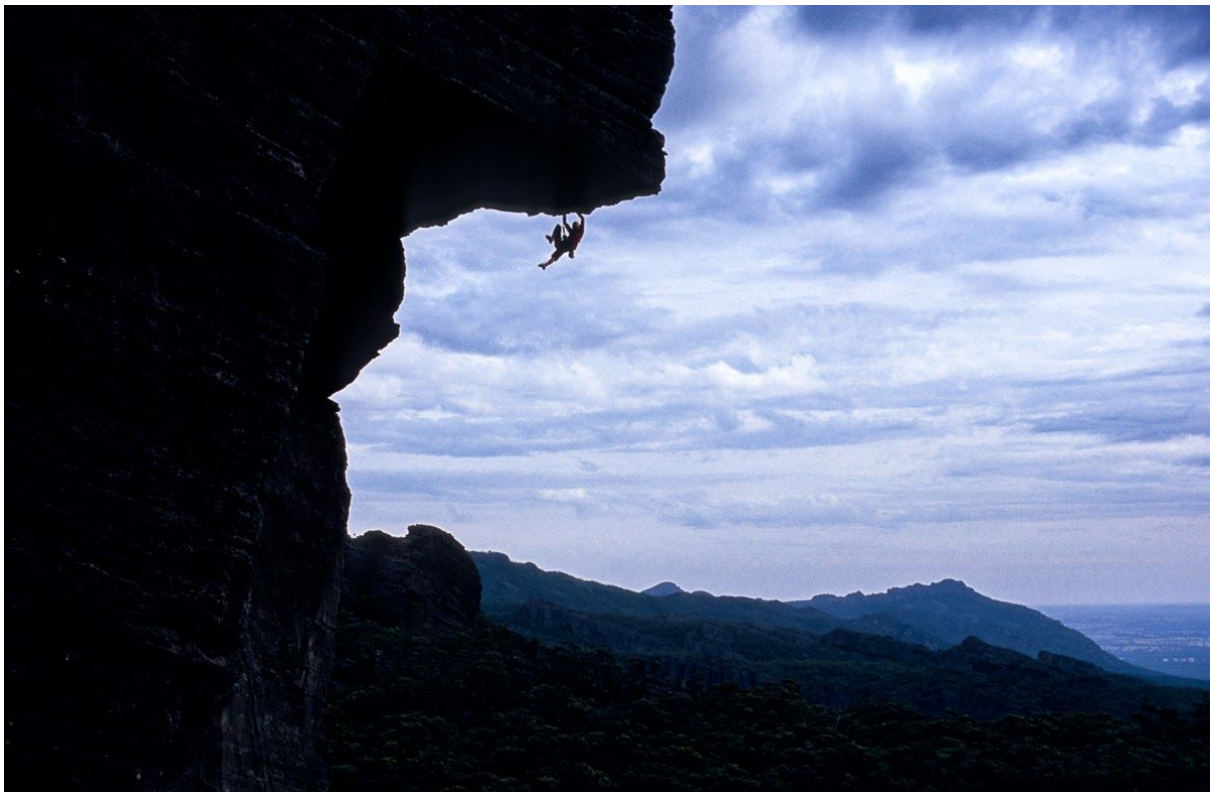
Social Contribution

Rock climbing helps foster socially responsible and engaged citizens by developing vital life skills such as risk-analysis, decision-making, self-discipline and accepting responsibility for one's actions. Many of Australia's rock climbers have contributed greatly to civic society as doctors, firefighters, nurses, search and rescue operators and successful business owners.

Generations of rock climbers have been introduced to the sport in the Wimmera region, where exceptional rock quality and a warm community welcome those new to climbing. Many young professionals, including health-care workers and teachers have brought sought-after skills to Horsham and surrounding areas, with climbing being the primary drawcard. Since the rapidly implemented climbing bans in 2019, some of these have left the area.

Parks Victoria's Healthy Parks Healthy People initiative

The exclusion of the climbing and bouldering community from the majority of locations within the national park goes strongly against Parks Victoria's Healthy Parks, Healthy People mission statement.



Climber on the iconic traditionally protected climb *Passport to Insanity* at The Fortress, in a remote part of the Victoria Range in the Grampians. This is one of thousands of routes and problems set to be banned under the draft plan.

Recommendations

Major Recommendations

1.1. Draft GGLDMP be withdrawn and referred to Planning Panels Victoria for review.

Considering the heavy social and economic impacts that the implementation this plan would bring about, as well as serious safety issues this plan would create, we request that the draft plan is withdrawn and the whole process is referred to [Planning Panels Victoria](#). This is the only way the public can have confidence in the plan and be sure that it has been conducted in an informed, rigorous and transparent way.

1.2. Adopt the established climbing management strategies presented within the *Victorian Climbing Management Guidelines*.

Many of the major problems with Parks Victoria's GGLDMP stem from its failure to adopt a nuanced fine-grained approach to the management of rock climbing in the Greater Gariwerd region.

Since 2019 subject matter experts in the rock climbing community have been working on guidelines to provide the mechanism for fine-grained management. In September 2020, the [ACAV announced](#) Version 4 of the **Victorian Climbing Management Guidelines**, and the 101 page document can be viewed [here](#).

This document was brought to the attention of Parks Victoria staff at the "Roundtable" meetings in 2020, but was dismissed with the claim that Parks Victoria can not have other forms of management within their plans. This is simply not true. Take, for example, the Australian Speleological Federation's *Code of Ethics*, and the [Minimal Impact Code](#) and references within the **Ngootyoong Gunditj Ngootyoong Mara South West Management Plan**, May 2015 (refer pp. 90; 96; 98; 99 and 103). The ACAV requests that Parks Victoria utilises the *Victorian Climbing Management Guidelines* and integrates it into the Greater Gariwerd Landscape Management Plan.

Further Recommendations

2.1. Access restrictions to be workshopped through consultation with climbing groups: ACAV, VCC/Cliffcare and Crag Stewards Victoria

- We urge Parks Victoria to take a fully collaborative approach to consultation with the climbing community, to reach a greater understanding of the range and depth of rock climbing experiences available across Greater Gariwerd.
- We reject the speculative closure of climbing areas. The case for a "precautionary approach" has not been proven.
- Parks Victoria to recognise the severe impact of the management proposals within the draft GGLDMP.

2.2 Take a climb-by-climb approach to managing climbing in environmentally and culturally sensitive areas

- All areas should be open with guidelines based on the cultural heritage present.
- Any environmental impacts should be addressed directly and specifically on a case-by-case basis.
- Climb-by-climb closures are standard practice for the protection of cultural locations around the world.
- All areas **without** cultural heritage present to remain open for rock climbing.
- Areas **with** cultural heritage present to be:
 - Managed in ways which are proportional to the significance and delicacy of the cultural heritage present.
 - Managed with a nuanced (fine-grained) management approach, whereby suitable perimeters around cultural heritage are drawn, appropriate to the risk involved. For example, stone quarrying may only require interpretive signage, whereas rock art may require a simple stone barrier and interpretive signage.
 - The ACAV suggests that a 10m perimeter around areas of significant cultural heritage (eg. rock art) be used as a benchmark, in line with international best practice. In keeping with existing practices, a small rock wall and interpretive signage is all that should be required at climbing areas.
 - Likewise, a reasonable perimeter and signage is recommended wherever rock shelter deposits, potential archaeological deposits, artefact scatters, rock wells and ochre sources are identified at climbing areas.
- Consult and coordinate with the climbing community to implement appropriate management practices in areas of environmental sensitivity. This may include rotating seasonal closures, caps on numbers at certain areas, and opening more areas to disperse the numbers.

2.3 A ten metre exclusion zone to be introduced as a default clearance to protect significant cultural heritage locations.

- A ten metre exclusion zone to be introduced as a default clearance to protect *significant* cultural heritage locations (such as rock art sites; whereas stone quarries sites would not require this same level of exclusion for their protection).
- Exclusion zone precedents exist at climbing and bouldering locations throughout the world.

2.4 Legal set-asides to be sought and legally compliant signage to be installed at each restricted location

- Parks Victoria cannot enforce and protect key locations without following the law in this manner.

2.5 The presence of stone quarrying must not be used as a blanket justification for excluding public access

- If the presence of stone quarrying required exclusion of the public, all tourist walking tracks in the Grampians would need to be closed.
- The installation of interpretive signage may be all that is required to ensure that culturally significant quarry sites are avoided.

2.6 Designated rock climbing areas and permit plans to be abandoned

- Parks Victoria to review its management approach and take a fine-grained approach to keep as many climbing and bouldering areas open as possible. Please refer to the *Victorian Climbing Management Guidelines*.
- Assessments for Designated Climbing Areas are only partially completed. The red/orange/blue/green cliff designations should not be included in this document, and will be out of date as soon as it is written.
- Climbing subject matter experts must be consulted to peer review the list and names of areas to cross check their validity.
- Permit proposals, combined with punitive restrictions will lead to the failure of this initiative, as the GGLDMP does not have the cooperative support of the climbing community.
- The ACAV supports a voluntary online cultural heritage induction process.

2.7 Safety bolts to be managed and maintained by climbing groups

- This is a serious safety and litigation issue. There is no other feasible solution.
- Parks Victoria must desist with its proposed group punishment approach to management. The proposal that the placement (or replacement) of a single bolt without the express permission of Park Victoria shall result in the closure of an entire climbing area for all climbers must be dropped.

2.8 Bouldering mats must not be prohibited as they are essential to reduce the risk of injury and death

- Potential litigation issue for Parks Victoria.

2.9 Chalk use to be accepted, subject to guidelines

- Chalk is required for safety purposes and it is an accepted practice worldwide.
- The ACAV encourages chalk clean-up initiatives and supports the efforts of Crag Stewards Victoria and Cliffcare in this regard.

2.10 Proposed ban on new climbing locations to be removed from the GGLDMP

- The public has a right to access the national park and reasonably engage in recreational activities

2.11 Off-track walking restrictions to be cancelled to allow off-track walking and the use of game trails

- The public has a right to access the national park and reasonably engage in recreational activities

2.12 Parks Victoria to work with VCC Cliffcare and Crag Stewards Victoria to maintain walking tracks and cliff bases

- Cliffcare has decades of expertise and experience in this area and Crag Stewards Victoria has gathered additional resources and enthusiastic volunteers to carry out this vital work.
- Work with Cliffcare and the Climbing Stewards Victoria to rehabilitate any impacted climbing and bouldering areas.

2.13 Bush camping to remain permissible subject to existing conditions

- "Camp Sandy" near Mount Stapylton to be recognised as a formal campground.

2.14 Parks Victoria to instigate peer reviews of all archaeological surveys conducted in the Greater Gariward region over the last two years.

- Archaeological surveys not only need to be impartial, they need to be seen to be impartial.
- For the sake of credibility, especially in the eyes of those park users who are being adversely affected by management decisions, Parks Victoria needs to address the threats to Aboriginal cultural heritage fairly and consistently across all activities. This will require Parks Victoria to acknowledge and address the significant vandalism and damage that is occurring to cultural heritage along numerous walking tracks in the Grampians.

2.15 Wherever graffiti occurs in the Grampians/Gariwerd, Parks Victoria must prosecute the perpetrators to the full extent of the law to protect the park.

- The ACAV encourages all members of the climbing community to report any graffiti, and encourages the prosecution of any member of the public engaging in such vandalism.
- There does not appear to be a single proven case of graffiti by recreational rock climbers in the Greater Gariward area. Therefore, this is not a reasonable justification for closing climbing areas.