

**A submission from the Victorian Climbing Club in response to the**

# **GREATER GARIWERD LANDSCAPE DRAFT MANAGEMENT PLAN**

**19 January 2020**



# Acknowledgements

The Victorian Climbing Club (VCC) acknowledges the Traditional Owners of the cultural landscapes of Gariwerd and acknowledges their spiritual and cultural connection to it and the importance of their ongoing role in caring for Country.

This submission has been formulated by the VCC, on behalf of its members, in response to the Greater Gariwerd Draft Landscape Management Plan.

The contributions of many individuals and organisations are acknowledged, including those who have provided access to reports, archives, photos and other information.

## Photo credits

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Save Grampians Climbing Fig 6 (p16), Fig 7 (p17), Figs 19 & 20 (p68)

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# **Introduction to the VCC submission**

This submission is made on behalf of over four hundred VCC members and with feedback or direct input from many of them. Its focus is to recommend amendments or inclusions for the improvement of the Greater Gariwerd Landscape Draft Management Plan (the Plan).

In particular, this submission looks at those parts of the Plan that would impact significantly on recreational rock-climbers. Many of the management approaches outlined in the Plan create severe limitations on the range of places where rock-climbing would be allowed and even greater limitations on where bouldering would be allowed.

The restrictions that are outlined in the Plan have ostensibly been formulated in response to the legislative obligation to protect cultural and environmental values in the Gariwerd landscape. Protection of such values is critically important, not just to land managers as custodians of the landscape, but also for current and future users of this landscape.

However, some of the assumptions apparently underpinning the management approaches to rock-climbing outlined in the draft Plan, particularly in relation to how climbing 'works' and the supposed risks of harm it poses to the cultural and environmental values of the places where it is carried out, are contentious and are not based on credible, peer-reviewed scientific evidence.

The approaches suggested in the draft Plan for managing these perceived risks, compared to managing similar and often greater risks from other recreational pursuits such as hiking, are inconsistent.

Many management options that could achieve the desired aims of robust cultural and environmental values protection, without draconian measures that will forbid climbing the vast majority of rock climbs in Gariwerd (and will effectively kill bouldering as a vibrant recreational alternative there) have seemingly not even been considered in the formulation of the draft Plan.

This submission endeavors to outline specific, constructive suggestions that, if adopted, would:

- *maintain or improve outcomes related to the protection of cultural and environmental values,*
- *improve opportunities for outdoor enthusiasts, particularly rock-climbers, to recreate in Gariwerd*
- *lead to improved physical and mental health outcomes by creating more such opportunities for people to be active in the natural outdoor environments of Gariwerd*
- *have a significant positive impact on the regional economy*

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# Executive Summary

Climbing in the Grampians/Gariwerd has a rich history dating back over 110 years, including a laudable history of climbers working collaboratively with Parks Victoria to pre-empt any environmental impacts and to minimise the footprint of climbing in the landscape.

Nonetheless, Parks Victoria has very recently adopted a so-called 'precautionary approach' which has seen climbing banned at hundreds of yet-to-be assessed sites until it can be established beyond any doubt that climbing is not likely to pose a significant threat to environmental or cultural values at these sites.

It is notable that such a precautionary approach has **not** been applied to the recreational group that has caused, and continues to cause, the most damage (graffiti, litter, erosion) to environmental and cultural values in Gariwerd - walkers (including general tourists causing damage along Parks Victoria trails).

*To achieve effective and sustainable management outcomes that are also equitable and just, Parks Victoria should:*

- *even-handedly apply the same management principles and approaches to all recreational users,*
- *seek to develop management interventions which achieve their objectives whilst minimizing the impacts upon other users of the Park, including climbers and*
- *examine how other jurisdictions and climbing communities have cooperatively managed similar heritage and environmental protection issues*

At first glance, the fact that climbing is allowed at 86 out of 281 areas listed would indicate that climbing is still allowed at 31 percent of climbing areas. However, over 200 climbing sites have been overlooked and are not in the Plan. Climbs in Designated Climbing Areas account for only 20% of all climbs in Gariwerd.

The best climbing sites and some of the most iconic, internationally celebrated climbs are now off-limits. Saying that there are still lots of places to climb in Gariwerd is like saying to a Victorian surfer that surfing is banned at Bells Beach, Johanna, Winki Pop, and Gunnamatta, but they can still surf in Port Phillip Bay!

If the proposals in the draft Plan are to be enacted, bouldering would fare even worse, with access allowed to only 6% of bouldering sites.

***The draft GGLMP proposes restrictions on rock-climbing (and bouldering) which, while not quite killing off this recreational pursuit in the Grampians/Gariwerd landscape, will effectively leave it on life-support.***

Unless a more nuanced set of proposals are adopted by Parks Victoria to protect environmental and cultural values, without blunt, widespread banning of climbing, the negative economic impacts on the region due to loss of climbing tourism and an exodus of climber tree-changers from the region will be heavy.

The need to protect environmental and cultural values in Gariwerd is not disputed. Indeed, this need is embraced by the climbing community. But such protections could and should be developed and delivered in ways that are more appropriately tailored to the particular circumstances of the various specific sites under consideration.

***A major aim of land managers should be to provide such protections in ways that enable climbing (and other recreations) to continue to flourish without compromising the environmental and cultural values of the Gariwerd landscape.***

***The following recommendations have been put forward based on this aim.***

## Recommendations

The Victorian Climbing Club recommends to Parks Victoria that

- 1) Parks Victoria adds another category - Designated Climbing Area with Restrictions - to the four categories used in the Plan to classify climbing areas. It should give due consideration to climbing areas that might be more appropriately classified as belonging to this category.
- 2) Parks Victoria adopts an approach of breaking up large climbing areas into smaller sectors for climbing access classification purposes.

Such an approach would result in greater climbing access than would be delivered by a classification system overlaid on a lesser number of larger areas. It can be achieved without any negative impacts on environmental and cultural values protections.

It would, consequently, also ensure less climbing tourists are deterred from visiting the region and more tourist dollars would flow into the region than would be the case if prohibitions were based on geographically broader areas.

- 3) Parks Victoria discards its discriminatory suggestion that climbers "only access climbing and bouldering areas via the designated access tracks".

Accessing climbing areas (once you step off the road) is walking, and should be treated as walking.

If walking off the track is prohibited (as it has been prohibited at Wilsons Promontory) then walking to cliffs other than by a track is prohibited. Indeed, to be consistent, walking off-track to do anything (photography, bird-watching, exploring) would need to be prohibited.

Prohibition of off-track walking would mean that access to the vast majority of what are classified in the draft Plan as Designated Climbing Areas would actually be prohibited.

If walking off-track is permitted, then walking to cliffs off track should be permitted.

- 4) Parks Victoria constructs a limited number of cliff access tracks (or formalizes some existing informal tracks) to some of the more popular cliffs as soon as possible.

To this end, we would recommend that Parks Victoria:

- collaborates with the climbing community to establish a list of appropriate climbing sites where this approach - constructing or formalizing appropriate approach tracks from existing PV tracks or roads to appropriate 'staging areas' at the base of crags or bouldering areas - could be employed,
- develops a priority list that ensures that any track construction timeline gives preference to suitable climbing sites that are also very popular and for which reinstated access would likely bring most visitors back to Gariwerd,
- develops a priority list of 'staging areas' at cliff bases that should be formalised, by surface hardening, discrete fencing or signage where appropriate, to minimise erosion and other potential environmental impacts.

- 5) Parks Victoria considers for assessment any 'standalone' boulders or bouldering areas that don't happen to be located close to a roped climbing area.

Such sites should be prioritized for assessment, whether they be in Designated Climbing Areas or not. In cases where there is deemed to be no significant risk to environmental or cultural values at such sites, bouldering should be allowed.

- 6) In cases where assessments of bouldering sites indicate that a particular site cannot adequately handle many boulderers simultaneously, Parks Victoria considers a range of possible measures that could be implemented to restrict numbers, in

preference to a blanket ban on bouldering at the site in question.

- 7) Parks Victoria accepts feedback from climber representatives to help inform a priority list of climbing sites and bouldering sites for assessment of cultural and environmental values.

Parks Victoria works to expedite such assessments as soon as possible with a view to allowing climbing access to those sites where there is no identified cultural values and no significant threats to environmental values.

- 8) Parks Victoria invites and seriously considers suggestions from the climbing community as to which large climbing areas, as currently defined in the Plan, might/should be assessed as a number of smaller sites - see recommendation 2.

Climbers are aware that there will undoubtedly be some sites that have value because of their part in a larger surrounding cultural landscape (and therefore should be viewed as an integral part of it).

Nonetheless, there will undoubtedly be other sites that could be subdivided from the larger areas that they are currently categorised as part of, and where climbing could occur without any risk of harm to cultural or environmental values.

- 9) Parks Victoria works to expedite such assessments (see recommendation 8) as soon as possible with a view to allowing climbing access to those sites where there are no identified cultural values and no significant threats to environmental values.

- 10) Parks Victoria jettisons its proposal to "Close any climbing areas where unauthorised replacement or addition of anchors occurs" (p107) – to punish a whole community because of a possible future transgression by an individual is appalling and discriminatory (since the same approach is not proposed for any other recreational user group – an equivalent response to

instances of graffiti caused by walkers on PV tracks would see virtually all walking tracks in Gariwerd permanently closed).

Instead, VCC proposes that Parks Victoria sets up an advisory body for the purpose of vetting/assessing proposals that climbers might put forward in regard to the installation, removal or replacement of fixed safety infrastructure.

This advisory body to be made up of a small number of experienced climber representatives and a small number of land manager representatives. This body would meet periodically for the sole purpose of assessing and making recommendations on any such proposal to the land managers (Parks Victoria and Traditional Owners). The land managers would then accept or reject the recommendations.

- 11) Parks Victoria sets up an advisory body for the purpose of vetting/assessing proposals or for the development of any 'new' potentially appropriate climbing sites.

As per recommendation 10, such an advisory body to be made up of a small number of experienced climber representatives and a small number of land manager representatives.

The advisory body suggested in recommendations 10 and 11 could either be one single body or two separate bodies.

- 12) Parks Victoria implement a system or mechanism that would enable climbing clubs or organisations to operate in a similar vein to Licensed Tour Operators (LTOs) in areas where it is currently intended (according to the Plan) that only LTOs and their clients can climb.

Such a system or mechanism would allow clubs or organisations to apply to run club trips on the strict proviso that all participants abide by prescribed rules and behaviors. Land Managers could stipulate, for example:

- a booking system
  - maximum numbers of participants allowed for each trip,
  - that participants agree to abide by specified codes of conduct and only climb in tightly defined areas,
  - that trip leaders successfully complete recognised inductions in regard to environmental and/or cultural values,
  - that all trip participants complete a briefing that could include briefing in regard to environmental and cultural values in the area concerned.
- 13) At sites where climbing is to be prohibited, it is recommended that any removal of fixed safety infrastructure be carried out by professionals who have extensive experience and expertise in the removal of various types of fixed protection. Such professionals can ensure that removal is completed with minimal trace and minimal impact on environmental or cultural values.
- 14) Given the intended prohibitions outlined in the draft Plan leave extremely limited options for people with disabilities wanting to climb, Parks Victoria should reconsider the prohibitions for climbing at sites that would be particularly suitable and where any risks of harm could be readily mitigated (perhaps including Back Wall at Summerday Valley).
- 15) Parks Victoria jettisons its proposal to require all climbers to get a permit to climb, boulder or abseil in the greater Gariwerd landscape.

It is discriminatory, given that the only other permits required for recreational activities are for competitive and/or commercial activities. It is also puzzling given participation in other recreational activities – activities such as hiking, 4-wheel driving or geocaching, to name just a few - do not require such a permit. This is despite, for example, far greater damage done to the environment and to cultural heritage by walkers using Parks Victoria tracks.

Instead, the VCC recommends that Parks Victoria works with the climbing community, particularly Crag Stewards Victoria, to develop an appropriate on-line induction module for climbers planning to climb, boulder or abseil in the Gariwerd landscape. This could be promoted by all climbing clubs in Victoria, advertised in climbing gyms and online climbing websites and forums, and actively supported by Parks Victoria and Crag Stewards Victoria.

The VCC's view is that such a pro-active, educational approach that fosters shared beliefs and actions that are concordant with the protection of environmental and cultural values, is likely to be far more effective than a punitive approach relying on fear of being fined for non-compliance with a discriminatory permit system.

- 16) Parks Victoria should formulate an evidence-based definition of low impact recreation and allow such low-impact recreational access to SPAs.

Such access could be contingent on following specified restrictions regarding how those low-impact activities can or can't be carried out. Any such restrictions should be dependent on the specifics of the values at the particular sites that need to be protected (for example, no access to specific sites at certain times of the year corresponding to raptor nesting).

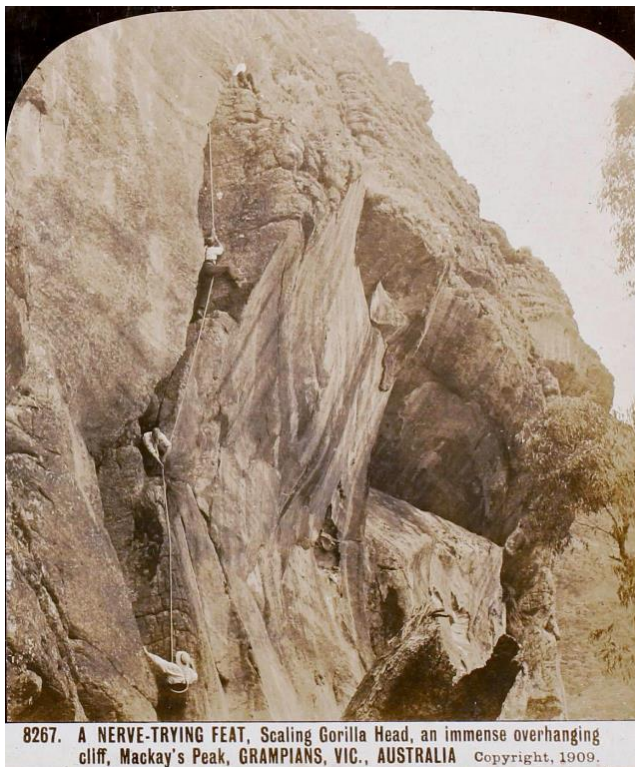
- 17) Parks Victoria should articulate a mechanism for regular engagement and pro-active collaboration with recreational user groups, including with the climbing community, in the Plan.

# 1 Context

## 1.1 History and evolution of climbing in the Gariwerd landscape

Rock-climbing, defined as using ropes and rudimentary belaying techniques, has been occurring in Gariwerd for at least 110 years.

The region is now a well-developed, world-renowned climbing destination - you could ask a random climber in the US, Japan, Brazil, Germany or France and they would all know of Gariwerd and most would desire to visit the area at least once in their lifetime.



Most records of climbing activities from the first 40 years have been lost – understandable given that two World Wars would have demanded the attention of, and probably claimed the lives of, many of the leading climbers of those times – though some records remain. Climbing in Gariwerd has continued to enjoy a steady growth over the decades.

*Figure 1 – climbers on Mackay's Peak, c 1909.*

Up until the 1960s, so called Traditional Climbing was the only style practiced. From about that time onwards, different styles developed – traditional climbing benefitted by the development of more sophisticated types of removable protection (such protection was placed by hand by the leader and removed by hand by the second). This clean climbing 'leave no trace' ethic became the dominant paradigm in the 1970s.

“Sport Climbing”, which relies on fixed protection (typically small 10mm diameter safety bolts that protruded by about 1 cm from the rock and sometimes required a small hanger about 3 cm in size), gained a growing number of followers in Gariwerd in the '80s.

In Gariwerd, the biggest surge in the development of sport routes occurred in the '90s, and the development of new sport routes has continued steadily since then, though at a more sedate pace.

Of the approximately 9,000 routes that have been climbed in Gariwerd, approximately 85-90% are traditional routes and 10-15% are sport routes.

The practice of using gymnasts' chalk (Magnesium Carbonate) to absorb sweat/moisture on the hands and improve grip was introduced into Australia in the '70s. It is widely used in Gariwerd and throughout the world.

Bouldering – climbing boulders that were usually small enough not to require ropes or harnesses to climb safely – has been practiced for over a century. It has gained more popularity and emerged as a form of recreation in its own right in more recent decades. The use of bouldering mats to protect boulderers from harm has been a notable development.

The other issue of note has been the development of a culture of proactive crag and environmental stewardship across the Victorian climbing community, particularly over the last few decades.



*Figure 2: Retaining wall repair at Summerday Valley, 2008*



*Figure 3: Flat Rock track repair, 2008*

Climbers are mindful of the increasing impact, and potential impacts made by larger numbers of climbers and other visitors to the places where they climb and to which they feel a special affinity. In response, they have endeavored to educate their community and to work 'on the ground' to minimize such impacts.

This has led to numerous collaborations with land managers in Victoria, including Parks Victoria, on a range of environmental and cultural values protection and maintenance projects in Gariwerd and across the state.



CliffCare working bee at Mount Rosea to repair access track after the 2011 floods. Work included track delineation and stabilization, clearing of debris, water bar/trenches above landslide track.



CliffCare produces and disseminates a range of educational posters for the climbing community, 2019

*Figure 4 – more examples of environmental stewardship initiatives.*

A more comprehensive list of climbers' environmental stewardship initiatives can be found on the CliffCare website:

<https://www.cliffcare.org.au/our-record>

Additionally, a more detailed overview of the development of climbing in Victoria can be gained from the *Victorian Climbing Management Guidelines*.

## 1.2 Climbing impacts on the Gariwerd landscape and consequent climbing management challenges

Several issues related to climbing have created some consternation among Parks Victoria staff and Traditional Owners. These issues include:

### **The use of fixed protection** (safety bolts).

Land managers are sometimes nervous about the prospect of fixed protection being placed in cliffs since they cannot vouch for its structural integrity or reliability. The failure of such protection is extremely rare and there has never been a case of climbers attempting to sue land managers in Victoria for such failure. Regardless, some land managers remain uneasy about this prospect.



*Figure 5 – Parks Victoria funded safety anchor installed at Staughton Vale, Brisbane Ranges to protect trees, prevent erosion and improve safety at this site. Work completed by CliffCare and Parks Victoria. CliffCare collection.*

The impact of a proliferation of fixed safety infrastructure on the 'visual amenity' of crag sectors which are close to public walking tracks can also be an issue, though such protection is usually difficult to discern and certainly pales into insignificance compared to 'official' Parks Victoria safety infrastructure such as hand-railings, signs, boardwalks or stairs.

It is notable that, within Gariwerd, the overwhelming majority of climbing routes (85-90%) neither have, nor need, fixed protection.

### **The use of chalk**

Though chalk residue left from hand contact with the rock is usually ephemeral (quickly washed off most routes by rain or, in places such as overhanging walls where rain or runoff does not reach, easily removed with a camel-hair brush or soft bristle-tooth-brush without causing any harm to the rock surface) it can be visually intrusive.

In response to possible impacts on the visual amenity of climbing landscapes, coloured chalk products have been developed to blend in with the natural colour of the rock. However, the uptake of such products by climbers has been limited thus far.

### **Bouldering and the use of bouldering mats.**

At some bouldering sites, there have been issues with ground compaction and damage to shrubs caused by use of bouldering mats at the base of boulders.

"bouldering may cause harm through trampling, touching the rock surface and the intensive use of chalk. Because of bouldering's intensive trampling footprint, partly due to the social nature of the activity and the use of bouldering mats along and around the base of rock features, it also poses a greater threat of damaging vegetation, soil compaction and erosion and has the potential to harm both surface and subsurface archaeological deposits."

p101, *Greater Gariwerd Landscape Draft Management Plan, November 2020*

### **The development of unofficial access tracks.**

Any walkers who leave official tracks to walk through the bush can leave traces of their passing such as trampled grasses or shrubs, broken twigs or compacted soil. The more people who take the same routes, the more likely such traces of their passing will be discernable.

VCC notes that many unofficial tracks in Gariwerd do not lead to climbing areas, and is struggling to understand why PV seemingly regards unofficial tracks as a climbing issue rather than a track issue. A reasonable person could see it as an excuse rather than a reason to restrict climbing.

Most of the walking access to crags in Gariwerd is along established tracks, including existing 4wd management tracks, walking tracks and roads, for most of the approach. Generally, the off-track component is short (though there are some notable exceptions). Where cliffs aren't popular, walking through the bush leaves minimal trace.

Where cliffs are very popular, climbers have traditionally worked with Parks Victoria (through organisations such as the VCC's environmental arm, CliffCare) to ensure appropriate tracks are built. These tracks avoid environmentally sensitive areas or places of significant cultural heritage and are constructed to minimise the potential for erosion. The climbing community has supplied volunteers to work under Parks Victoria direction in carrying out many such micro-infrastructural projects over the last two decades.

In summary, climbers' occasional use of safety infrastructure/fixed protection, boulderers' use of bouldering mats, the use of gymnasts' chalk and issues relating to the creation of unofficial access tracks to cliffs and boulder areas are all important considerations for land managers when evaluating ways of minimizing climber impacts on crag environments.

## 2 Draft Plan implications and concerns

### 2.1 Implications

#### 2.1.1 Implications for Climbing

***Climbing, both traditional climbing and sport climbing, will be hugely impacted by the proposed climbing prohibitions.***

The Parks Victoria figures presented in the Plan indicate that 281 climbing 'areas' have been defined and categorized. Of these areas, it is proposed that climbing be allowed in 86 of these. Many other areas are to be assessed at some unspecified time in the future but the intention is that climbing not be allowed in these areas until such assessments are carried out. Presumably, some areas might be opened up to climbing in years to come if it is determined that there are no significant risks to cultural or environmental values.

Analysis of the areas listed in the draft Plan is misleading. 86 out of 281 areas would indicate that climbing is still allowed in 31% of these areas. However, when we take into account the many climbing sites that are not listed in the Plan (see section 2.2.4 and Appendix 2) and look at the number of climbing routes that there are in these areas, the percentage of routes still accessible to climbers is significantly less:

21% approved – 1887 routes/problems

18.5% closed permanently – 1618 routes/problems

59.2% closed pending assessment – 5177 routes/problems

0.7% approved only for Licensed Tour Operators – 64 routes

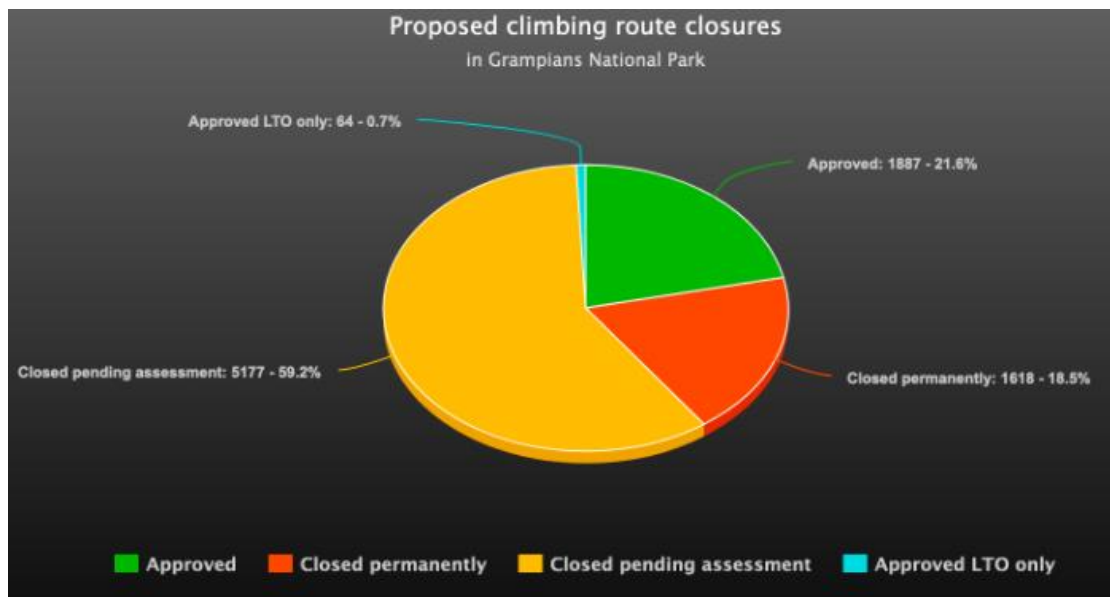


Figure 6 –proposed climbing route closures

***The proposed prohibitions on climbing impose a disproportionate burden on climbers with disabilities.*** This has been the experience of people with disabilities in the United States where climbing sites that are readily accessible, and therefore popular with people with disabilities, have been made off-limits to climbers.

As Access Fund Executive Director, Chris Winter, notes (Access Fund, 2020)

“These regulations can have disparate impacts and create equity issues, especially if people who already face barriers find it even harder to get out on public lands.”

***In Gariwerd, judging from the very limited range of good quality, easily accessible crags that are Designated Climbing Areas listed in the draft Plan, there will be very few options for people with disabilities wanting to climb.***

### 2.1.2 Implications for Bouldering

***Gariwerd's world-famous bouldering will be almost eliminated by the proposals in the Plan.*** A maximum of only **6%** of previously available boulder problems would remain 'open' if bouldering is limited to areas where roped climbing is allowed (in the Designated Climbing Areas as currently defined in the draft Plan).

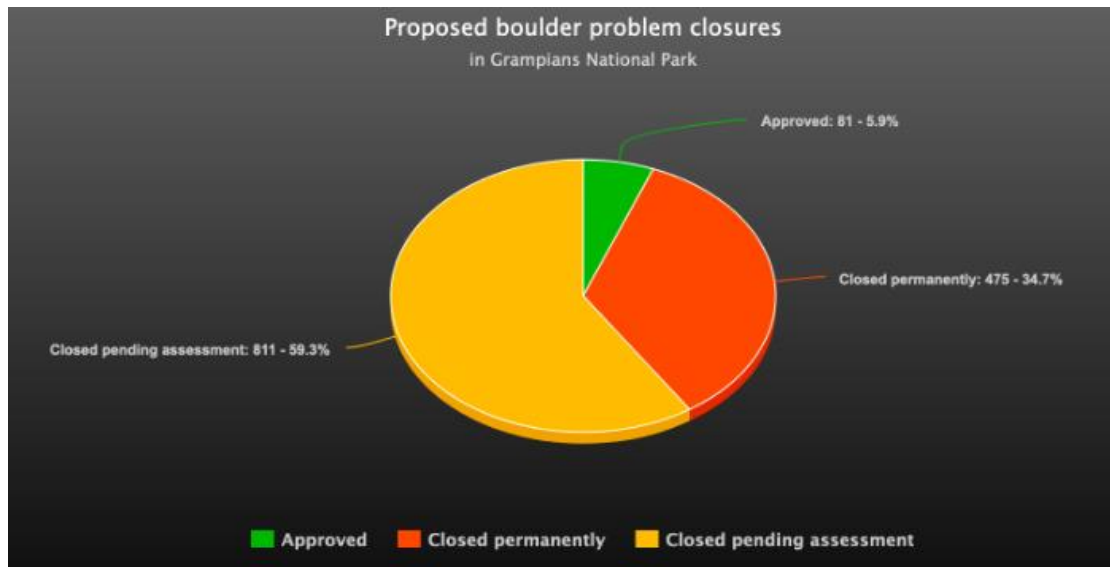


Figure 7 –Proposed boulder problem closures

In terms of the best quality boulder problems, the ones that act as a magnet drawing climbing tourist from all over the world to this region, the figures are even bleaker – none will remain legal (see Appendix 3).

If we look at the highest quality boulder problems at the higher end of the difficulty scale (grade V8+), the ones that draw elite international boulderers from around the planet and that have put Gariwerd 'on the map' as an international bouldering destination, the figures are heart-breaking – only 2.4 % of the best (3 star) top 50 harder problems remain accessible. See Appendix 3.

## 2.2 Concerns

### 2.2.1 Lack of a robust evidentiary basis for many management strategies impacting on climbing

Many of the intended approaches relating to the management of rock-climbing, as mapped out in the Greater Gariwerd Landscape Draft Management Plan, seem anomalous when compared to the intended approaches to management outlined for other recreational activities in Gariwerd. Some of the apparent assumptions underpinning these intended approaches for managing rock-climbing don't appear based on robust evidence.

One example relates to management of recreational activities in Special Protection Areas (SPAs). It is argued in the draft Plan that

"Recreation and use will be allowed where it is compatible with the protection of the cultural and natural values of the landscape ...with restrictions proposed on recreation where activities risk harming these values." (p92)

Yet there is no substantive peer-reviewed research cited that provides robust evidence that would indicate the relative levels of risk to cultural or environmental values posed by various recreational activities.

Unfortunately, the *Archaeological Field Survey of Climbing Areas* (Parks Victoria, 2020), upon which climbing-related decisions by Parks Victoria seem to have been predicated, contains a range of errors (see Appendix 4). These include a number of unsubstantiated attributions of harm and a range of erroneous assumptions about what the authors appear to believe to be universal climbing practices. These have led to false extrapolations, based on wrong understandings or on obsolete historical practices, and over-statements of risks of harm from climbing.

Management details for each specific SPA, outlined in Appendix 3 of the draft Management Plan, typically state that either "Standard restrictions on recreation activities apply" or "Only passive

recreation activities, such as walking and wildlife observation are permitted”.

Yet “Standard restrictions” is not defined in the draft Plan. Rather, different restrictions are outlined (in section 5.3 of the Plan) that are to be applicable to different activities. There does not seem to be a consistent or standard application of such restrictions across the different recreational activities.

Nor is any definition of “passive recreation” given. Presumably, PV’s idea of “passive” relates to the physical impact of the activity on the landscape.

***The greatest impacts or harm that have been done to the landscape by recreational users in Gariwerd have been caused by casual walkers. Similarly, based on the number and scope of instances of harm already done, the greatest ongoing risk of more harm being done is also by casual walkers. This is true whether the harm in question is to cultural values or environmental values*** – see appendix 1.

***By allowing people to walk in Special Protection Areas (SPAs) on the basis that walking is a passive recreation, such harm will continue to occur. There does not seem to be a defensible logic to banning a low-impact recreation such as climbing in SPAs whilst still allowing walking in those same SPAs.***

## **2.2.2 Current climbing area classification categories in the Plan.**

In the current draft Plan, there are four classifications used:

- *Designated Climbing Areas*
- *Designated climbing Areas (LTO only)*
- *Climbing Not Permitted*
- *Possible climbing Areas (under review)*

Unfortunately, ***there is no category that allows for climbing with particular restrictions (other than designated climbing areas only for LTOs).***

There are a number of cliffs where it could be appropriate for climbing to occur but with some restrictions. At Taipan Wall, for example, conversations between land managers and climbers have led climbers to believe that it could be feasible to allow climbing to occur at some sectors along the wall but not others, and/or subject to certain stipulations.

Such restrictions might include, but not be limited to:

- bans on access to the base of certain cliff sectors (perhaps with discrete fencing of these sectors to channel traffic around or away from them) but which allow access to other sectors,
- abseil access to specified point above the ground that enables routes to be climbed that would otherwise be off-limits, or
- seasonal climbing restrictions for specified sectors.

Such an approach would be welcomed by climbers but does not seem to be countenanced in the four-tier area classification approach as currently outlined in the draft Plan.

### **2.2.3 The defined climbing areas**

Climbing “areas”, as defined in the Plan, are too large. We can see that this is causing climbing to be banned from sectors where there may not be any cultural values sensitivities and where climbing is unlikely to cause harm – i.e. climbing will be prohibited in those sectors simply because they are in a larger area in which there are some identified cultural values.

Consider, for example, the area known as Brim Springs (or Geranium Springs). When artwork was re-discovered at some boulders in the area (in the early 1990s) climbing was immediately banned. The VCC was quick to walk with the archaeologist to the site and point out that

the climbing was actually a couple of hundred metres away. The ban was promptly rescinded (though, interestingly, it is back again now).

Consider a further example of Gilham's Crag which is currently categorised as an area where no climbing will be allowed. There is a small rock shelter (where cultural values have been identified) at the far left/northern end of Gilham's. There is a series of climbing 'sectors' stretching rightward for approximately 400-500m, around to a sector called The Chilly Bin.

It is understandable that Parks Victoria have seen that there is a place that climbers use called Gilham's Crag and that there are cultural values there, ergo, climbing will be prohibited there.

It might be more appropriate for climbing to be prohibited from where cultural values actually *are* (understood to be a sector called Goat Crag where there is a small rock shelter with evidence of indigenous occupation), and perhaps even from the sector on the right and the sector on the left (creating a reasonable 'buffer zone'), but allowed at the various sectors further right/south. Such an approach could ensure the protection of cultural values without the need to prohibit climbing along the whole escarpment.

***If Parks Victoria continues to use the areas as defined in the Plan as the basis of its classifications the end result will be:***

- ***climbing will remain prohibited from a larger number of climbing sectors than the protection of cultural and environmental values would require***
- ***loss of significant income from groups in the educational sector who are no longer able to conduct training in easy to access sectors without an LTO***
- ***Gariwerd being a less attractive destination for climbing tourists***
- ***loss of considerable climbing tourist income into the region, and the state***

#### 2.2.4 Errors or omissions

##### - The existence of some climbing areas overlooked

"Parks Victoria defined 281 Possible Climbing Areas across the park." (p101 *Greater Gariwerd Landscape Draft Management Plan*, 2020).

**Over 200 crags have been overlooked and not taken into account by Parks Victoria in its assessments or classifications of areas.** These overlooked walls or buttresses will, by default, be off-limits to climbers until they can be assessed and classified. See Table A2 (Appendix 2).

##### - No breakdown of figures by different climbing genres

The figures related to climbing areas given in the Plan make no attempt to show any breakdown into numbers indicative of areas or number of routes according to different climbing genres (bouldering, sport, trad) despite the acknowledgement elsewhere in the document that these are separate "activities".

Consequently, the bald figures for numbers of climbing areas where climbing is to be allowed, allowed with LTOs only, prohibited, or where the decision is still pending future assessments, give **no** indication of the impacts on these different types of climbing activities.

**The prohibition of climbing from the areas listed in the Plan would have a hugely disproportionate impact on bouldering and sport climbing (the style of climbing that is the biggest climbing tourism drawcard), compared to the impact on trad climbing**

##### - There is a disproportionate burden of intended climbing bans on climbers with disabilities

Perhaps the most appropriate venue in Gariwerd for climbers with disabilities, Summer Day Valley, can only be accessed by climbers with the financial wherewithal to afford to pay for a Licensed Tour Operator.

***Such restrictions, and an intended ban on the development of any new climbing areas, including those where there is no risk to environmental or cultural values and which might be appropriate for climbers with disabilities, have severely and disproportionately limited the options for people with disabilities to get out and climb.***

The disproportionate negative impacts of such restrictions on people with disabilities is at odds with Parks Victoria's stated commitment in its 2017-2020 Disability Action Plan to create "an inclusive environment that enables visitors with a disability, their families and carers to obtain the health and wellbeing benefits from visiting a park."

#### **2.2.5 Uncertainty about timelines for ongoing cultural and environmental values assessments**

Since the set-aside determination for Gariwerd was announced almost two years ago (in February 2019), Parks Victoria, by assigning considerable resources to the task, has been able to carry out cultural heritage assessments of 125 sites. These assessments were followed by the assessments of two more sites, Taipan Wall and Bundaleer.

Generally, these assessment sites have been the 'low hanging fruit' – relatively easy to reach sites, usually approached by a short walk along good Parks Victoria walking tracks and often very close to each other (e.g. Sandinista Wall, Gun Buttress, Amnesty Wall, Andersens bouldering area are all within 200m of each other and from the PV Hollow Mountain track).

Over 300 climbing sites remain to be assessed (not just the 126 sites that are indicated in the draft Plan as still needing to be assessed), including approximately 5,000 routes. Some of these sites require a long, arduous uphill approach through the bush, taking well over an hour for a fit individual to reach from a car.

Assembling and organising representatives from each of the three indigenous mobs, plus PV staff, plus an archaeologist to be able to

walk in to a crag such as Green Gap Pinnacle, for example, which has a long arduous off-track approach, could be a considerable logistical challenge. And that is just one cliff. It is difficult to see how Parks Victoria could get around to carrying out assessments on the hundreds of crags that haven't yet been assessed in anything less than another two or three years.

***The continuation of climbing exclusions from these yet-to-be-assessed crags is likely to be for years after the GGLMP is finalized. It would mean that the significant negative economic impacts on climbing tourism caused by these exclusions (including the significant drop in international climbing visitors noted in the wake of the bans and before the Covid pandemic) will also continue for that time.***

## 2.2.6 Channeling climbers into less climbing sites

Since the announcement of the Set-aside Determination in February 2019 prohibiting climbing from large swathes of Gariwerd, climbing sites where climbing was still allowed received markedly increased pedestrian traffic in the remainder of the year than they had experienced prior to the announcement of the Determination.



*Figure 8:  
erosion on  
the  
approach  
to the  
Watchtower  
(near Halls  
Gap)*



*Figure 9:  
erosion  
near the  
base of The  
Watchtower  
(near Halls  
Gap)*

*Some of these areas that remain open are showing considerably more signs of 'wear and tear' than ever previously seen as individuals and groups of climbers (including groups guided by Licensed Tour Operators) choose from a significantly diminished number of suitable climbing venues still available to them.*

#### **2.2.7 No development of new climbing areas**

The proposal in the draft Plan that "no new potential climbing areas will be designated following the publication of the final Management Plan" is problematic.

*Such a proposal would:*

- *forego the possibility of developing climbing, even in areas where there are no cultural heritage values or any likelihood of significant negative environmental impacts.*
- *limit the growth of climbing in Gariwerd and the growth of climbing tourism as a means of bringing more money into the regional economy*
- *mean that any growth that does occur would lead to greater pressures on the hugely decreased number of sites where climbing will be allowed (the Designated Climbing Sites).*

#### **2.2.8 Bouldering – problems with assumptions and recommendations**

Currently the draft Plan states that bouldering will only be allowed at a limited number of locations within the 'Designated Climbing Areas'. Even in such areas,

"Bouldering and bouldering mats are to be prohibited in these areas unless specified as one of a limited number of 'bouldering permitted' locations (locations yet to be determined)." (p104).

Further, Parks Victoria

"...aims to complete evaluations and determinations for the remaining areas of most active climbing use, completing the highest priority areas within 12 months of the release of the final management plan. Areas not completed within that timeframe will then be evaluated on the basis of demonstrated need ... The evaluation and determination for potential bouldering sites within Designated Climbing Areas will be undertaken in parallel with the above assessment process." (p103)

In other words, ***no bouldering whatsoever will be allowed in Gariwerd from when the Plan is adopted until after a limited number of assessments of potential bouldering sites (and only within Designated Climbing Areas) have been completed and some sites are deemed to be suitable for bouldering.***

This approach is problematic for a number of reasons:

- 1) Evaluations of bouldering sites are only intended to be carried out for sites within a few Designated Climbing Areas. This seemingly ignores that fact that ***many bouldering sites are not contiguous to roped climbing sites. Some of such 'stand-alone' bouldering sites would undoubtedly be sites where there would be no significant risk of harm to environmental or cultural values. Yet, because they don't happen to be at places where roped climbing occurs, they will seemingly not even be considered as potentially appropriate and legitimate bouldering locations.***

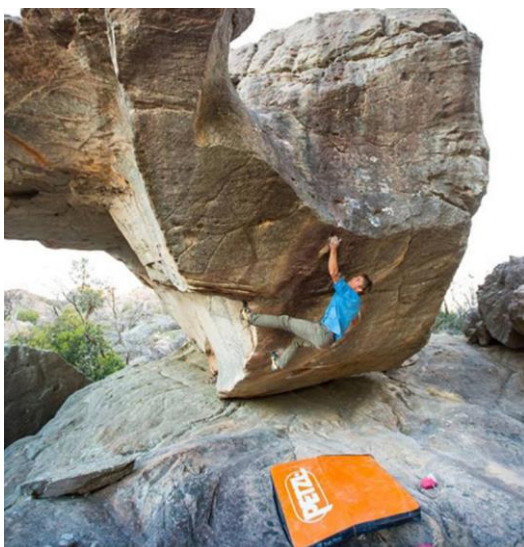


figure 10:  
The world-famous boulder problem, Ammagamma, located less than 50m from an official Parks Victoria track.

The base area (and potential landing area) around the boulder is rock, so the use of mats at this location does not contribute to soil compaction or erosion or constitute a risk of harm to environmental values.

- 2) It is noted in the Plan that evaluations of bouldering sites
- “... will consider the need for sites to be able to accommodate intensive use”.

It is ambiguous from a reading of the Plan as to whether bouldering will automatically be banned at any site that is deemed to be unable to accommodate intensive use. ***There appears to be no consideration of an option to cap maximum numbers of people bouldering at sites, in preference to total banning of bouldering at such sites.***

Bouldering can be a very social activity where people encourage the efforts of the rest of the boulderers in their group. However, it can also be an enjoyable activity for individuals who boulder on their own or in pairs; to proscribe this possibility because of fears about possible impacts of larger groups would be unnecessary and ill-conceived.

- 3) The flow of the component of international, interstate and intrastate tourism that is made up of boulderers will effectively cease for an indeterminate time (until bouldering site assessments are carried out), resulting in a significant negative impact of the regional economy.

Even after such assessments are eventually carried out, the prospects for bouldering will remain grim. ***Bouldering is only being considered as a possible recreational activity within designated climbing areas (where roped climbing will be allowed to occur). Even if bouldering is allowed at ALL such sites after assessments are completed this would still result in 94% of all known/current bouldering in Gariwerd being prohibited.***

## 2.2.9 Adverse economic impacts on the local and regional economies

### Climbing Tourism

Estimates of the economic contributions of climbing tourism to the Western Victorian regional economy vary but the general consensus is that such contributions are very significant and the following facts are indisputable:

- Most climbers who travel to Western Victoria to climb primarily visit Gariwerd (The Grampians) and Dyurrait (Mt Arapiles). Climbing visits to these destinations tend to include stays over at least one night.
- Compared to climbing visits to Dyurrait, where most overnight stays are at the Arapiles/Tooan State Park campsite and a few accommodation places in Natimuk, climbing visits to Gariwerd are more dispersed across a much wider range of climbing sites and accommodation sites and numbers are therefore more difficult to accurately estimate.
- 2018 figures for Dyurrait indicate 87,000-day visits (over 90% of these visits - 78,300 - are for rock-climbing) and approximately 20,000 overnight stays (17% of these are international climbing visitors).
- Gariwerd has a far greater range of Sport climbs (and world-famous boulder problems) than does Dyurrait (Dyurrait is world renowned as a centre for Traditional climbing).
- Most international climbers (particularly European and American climbers) generally prefer sport climbs. They are often unfamiliar and unprepared to attempt climbs requiring traditional climbing techniques. For this reason, it is reasonable to assume that ***the annual number of international climber overnight stays at Gariwerd annually is significantly higher than the approximately 3,400 at Dyurrait. The risk of the loss of the bulk of these international visits, plus the many tens of thousands of other (interstate and intrastate) climbing visits is substantial.***

The recent economic assessment of rock climbing in the Grampians (Gariwerd) National Park and Mount Arapiles/Dyurrait (Rowlands, 2021) estimates direct and indirect benefits of rock climbing in 2018 in western Victoria to be \$24.2 million. In the Grampians region alone, the economic benefit was just under \$12 million.

Around the world, communities near climbing areas are becoming acutely aware of the positive impact that climbing is having on regional economies. The direct benefits identified by Morris (2007) and Maples et al (2017), when adjusted according to currency differences and climber numbers, are concordant with the figures proffered by Rowlands (2021).

It is of note, by way of comparison to the economic contributions of climbing tourism to the Grampians, that the estimated economic contribution of the Grampians Peaks Trail is far less, despite tens of millions of dollars spent on it (over thirty million dollars for stage 2 alone) compared to no significant government spend on climbing:

"The major economic benefit is the increased visitor spending and employment flowing directly from people who have come to walk the Grampians Peaks Trail, as well as increased visitation to the Grampians in general. In 2015 the trail will generate an estimated \$2.55 million, increasing to \$6.39 million by 2025. " (Parks Victoria, 2014)

### **Climbing as a catalyst for skilled people moving to the region**

Apart from money injected into the local economy by climbers visiting Gariwerd from outside the region in order to climb, there is also a substantial economic benefit from climbing 'tree-changers' who have moved to the region to live, primarily because of the climbing lifestyle opportunities there.

Some of the small communities close to Gariwerd, where many climbers have settled because of the climbing opportunities that the region offers, have been thriving while many similar sized hamlets across the state are in steep decline.

For example, in the small hamlet of Pomonal (population 322) on the eastern side of Gariwerd, a significant number of property owners are climbers. They include financial planners, teachers, paramedics,

small business owners, LTOs, hospitality staff and other professionals. They have moved to the town because of the climbing lifestyle opportunities it offers. Most have children in local schools. If they were to leave because those opportunities were to dry up because of climbing prohibitions, the town would lose over 10% of its population.

A more dramatic example is Natimuk (close to Dyurrait but also relatively close to Gariwerd) where about a quarter of the population of 530 people are climbers or families of climbers. Of all the houses in Natimuk, 47 (21%) are owned by climbers. Many of these people have moved to Natimuk over the years because of the opportunities to climb at Dyurrait and nearby Gariwerd.

They have opened businesses in the region (a rock climbing guiding business that employs over 30 people, a climbing gear store, a local café opened by climbers, and various accommodation businesses, for example) and created many jobs for locals.

They have brought hard-to-attract professional skills to Natimuk and nearby Horsham; medical professionals (according to the 2016 national census, 14.9% of the Natimuk labour force were employed in hospitals compared to the Victorian state average of 4.1%), lawyers, teachers, tradespeople, scientists, engineers, artists, accountants, IT professionals and administrators.

***There are fears these people will abandon the region if the current temporary bans on climbing in much of Gariwerd are made permanent or, worse, spread to Dyurrait.***

Without the children of climbers, Natimuk Primary School would most likely have closed years ago. Climbers are on the school board. They are in the local CFA brigade - of the last 103 turnouts, 99 had climbers forming part of the response crew. Of the 324 individual person-responses underpinning these turnouts by the Natimuk brigade, climbers accounted for 271 of these (84%). Climbers are in the SES, and are members of sporting clubs and organisations that are critical to the fabric of small towns such as this. 39.1% of the Natimuk

workforce do voluntary work through an organization or group (compared to the Victorian state average of 19.0%).

Already, many who are, or were, considering moving to Natimuk have delayed plans due to the uncertainty about the future of climbing at Gariwerd and at Dyurrait. There is great concern in the town; a mixture of incredulity, despair and anger.

Natimuk residents are acutely aware of the severe downturn in patronage of many businesses in the Gariwerd region following the announcement of the climbing bans in Gariwerd in February 2019.

***In the 12 months since those climbing bans were announced (i.e. before Covid-19 was an issue), the effects on some local Gariwerd businesses have been dramatic.***

Happy Wanderer Holiday Resort owner Janet McLachlan, of Wartook, noted that climbing access concerns have "decimated" businesses in the area (Wimmera Mail Times, 2019).

Her views are mirrored by Steve and Jenny Vines, owners of the Grampians Edge Caravan Park, at Dadswells Bridge, on the opposite side of Gariwerd. They had made significant investments in their business to cater for climbers, only for climbing visitor numbers to plummet in the wake of Parks Victoria's announcement of the bans. Visits by international tourists coming to climb had fallen by over 25% in the 12 months of 2019, compared to the annual figures for the previous few years.

Mount Zero Log Cabins owner Neil Heaney's experience is similar, with 2019 visits down approximately a quarter on the previous year. Mr. Heaney suggests that,

"Parks Victoria are picking on the wrong people. The climbers who stay at our cabins are deeply respectful of the environment. Some of them fill bags with litter collected from the Park and bring it back to our bins, which I don't mind. If Parks did their homework, they would find that most of the negative impacts on the Park including litter and graffiti are

from general tourists, not from climbers. Are they going to ban walkers from accessing the places from which climbers are being excluded?”

According to Rowlands (2021), **an estimated 290 individuals are seriously considering a move from the region, in the process of moving, or have moved, because of the climbing bans.**

#### **2.2.10 Problems with the proposal to close any climbing areas where unauthorized replacement or addition of anchors might occur.**

Climbers would be happy to work with Parks Victoria to ensure that existing safety anchors are only removed or replaced with Parks Victoria’s authorization.

*However,* the suggestion that it is appropriate to punish a whole community because of a possible future transgression by an individual is appalling.

If an angler took an undersized fish from a particular beach location, Parks would not ban all anglers from fishing there. If a walker left litter or added graffiti along a Parks Victoria track, PV would not close the track to all walkers.

***If Parks Victoria were to be consistent with the approach they are proposing for climbers, and closed walking tracks whenever a tourist defaced rock with graffiti, most of the walking tracks in Gariwerd would be permanently closed.***

***So why would PV even consider such a discriminatory approach in regard to climbers, particularly when there are far more effective options available for ensuring protection of cliff environments?***

### **2.2.11 Risks associated with the proposal for removal of fixed protection from areas/sites where future climbing will be prohibited**

Parks Victoria notes (p130 of the draft Plan) that it intends to “liaise with the Defense Force so that training in climbing skills ... assists with ... remediation of bolts and chalk at priority rock shelters and lower cliff faces to restore them to their natural and cultural state”. This is an alarming proposal if the goal is to protect or restore the integrity of cultural or environmental values.

***This task requires significant expertise if it is to be done in a way that avoids harm and improves rather than worsens any impact on the rock environment.***

There are vertical access professionals (invariably including experienced climbers in their employ) who have developed this expertise over many years and who are conversant with world’s best practices for removing ‘carrot’ bolts, expansion bolts and glue-in bolts, respectively.

The ADF’s vertical access and climbing capability to carry out this task and, more importantly, the number of people in its ranks with the requisite expertise to remove protection bolts in a manner that does not lead to rock scarring, is extremely limited.

Using an unskilled labour force to remove fixed protection runs a considerable risk of causing irreversible harm. It is imperative that such risks be minimized by using skilled professionals.

### **2.2.12 Problem with the proposal that climbers “only access climbing and bouldering areas via the designated access tracks” (p106)**

***Accessing climbing areas (once you step off the road) is walking, and should be treated as walking.***

***If walking off the track is prohibited (as it has been prohibited at Wilsons Promontory) then walking to cliffs other than by a track is prohibited. Indeed, to be consistent, walking off-***

**track to do anything (photography, bird-watching, exploring) would need to be prohibited.**

Prohibition of off-track walking would mean that access to the vast majority of what are classified in the draft Plan as Designated Climbing Areas would actually be prohibited.

**If walking off-track is permitted, then walking to cliffs off track should be permitted.**

The use of the term “designated access tracks” is confusing. It does not appear to be defined anywhere in the draft Plan. Nor are any access tracks designated in the draft Plan as the appropriate tracks to access particular cliffs.

Almost none of the climbing sites currently identified in the draft Plan as Designated Climbing Areas (DCAs) have formal tracks leading to the base of the crags or boulders in these DCAs.

Presumably, that would mean that almost **no climbing or bouldering, even within Designated Climbing Areas**, would be allowed until Parks Victoria finally gets around to constructing tracks to the base of these cliffs or boulders.

### **2.2.13 Problems with mandatory permits for recreational climbers**

***It is incongruous that Parks Victoria is proposing that participation in climbing, bouldering or abseiling in the Gariwerd landscape will require a permit, whereas participation in other recreational activities – activities such as hiking, fishing, 4-wheel driving or geocaching, to name just a few - do not require a permit. Given the far greater damage done to the environment and to cultural heritage by walkers using Parks Victoria tracks, this is puzzling. It is also hard to justify, given that the only other permits required for recreational activities are for competitive and/or commercial activities (e.g. car rallies or competitive events).***

Climbers understand that Parks Victoria want to be reassured that climbers are exposed to appropriate cultural heritage induction, expected climbing behaviours and up-to-date information about regulations and any area-specific restrictions that apply. Whether a mandatory permit system would garner adequate support and compliance, particularly when it is seen as unfairly applied to one recreational user group, is debatable.

If the aim of the proposed permit system is educational (i.e. intending to provide factual information and a clear outline of behavioural expectations) then the failure by P.V to discuss other options with the climbing community for achieving this aim (e.g. an online induction process supported by climbing clubs and the broader climbing community) is a major opportunity missed.

#### **2.2.14 Lack of a suggested mechanism for genuine ongoing consultation during the life of the Plan**

Lots of people have made deep connections to the Gariwerd landscape in the last two hundred years. It was heartening to hear the acknowledgement of these people's connection to country by Damein Bell in the video accompanying the launch of the draft Plan:

"We need to work together because Gariwerd is important to all of us" - from the video that accompanied the launch of the draft Plan, November 2020.

***Unfortunately, there appears to be no commitment in the Plan to a mechanism that would help enshrine that sentiment by ensuring regular, pro-active consultation between land managers and representatives of recreational climber user groups.***

There are certainly precedents for such genuine collaboration with other recreational user groups in PV-managed parks in Victoria. For example, Parks Victoria "engages with the Victorian Speleological Association Inc., the Australian Speleological Federation Inc., and the Australian Caves and Karsts Management Association to protect caves and karsts." (Parks Victoria, 2015).

Such a commitment to genuine collaboration would better enable potential problems to be avoided or mitigated, and solutions to be developed that would likely be more efficacious and satisfactory to both the land managers and recreational user groups.

### **2.2.15 Lack of emphasis on proactive management**

p91 of the Plan lists lots of “potential impacts from recreation”, but the only ways of managing and minimizing these impacts that are mentioned (p91,92) are those related to management by regulations and (implied) associated fines for anyone who infringes these regulations (i.e. reactive rather than pro-active approaches).

***Unfortunately, the opportunity to articulate and emphasize options for pre-empting harm*** (for example, by working collaboratively with groups such as *CliffCare* and *Crag Stewards Victoria* to protect and maintain cliff/crag environments, and by planning and developing appropriately routed tracks that deliberately avoid sensitive areas whilst facilitating access to popular climbing sites, rather than banning such access) ***seems to have been largely neglected.***

## 3 VCC Recommendations

### 3.1 A consistent approach to managing recreational activities

There is a need for Parks Victoria to adopt a more consistent, non-discriminatory approach to managing recreational activities, particularly in places of special cultural or environmental value, such as Special Protection Areas (SPAs).

**VCC suggests that Parks Victoria adopts a less arbitrary approach that can be applied equally to all recreational user groups.**

**This could be accomplished by banning all recreational access to SPAs (including access to walkers, since they cause far more harm to cultural and environmental values than any other recreational user group).**

**VCC suggests, instead, that Parks Victoria formulates an evidence-based definition of low impact recreation and allows such low-impact recreational access to SPAs.**

**Such access could be contingent on following specified restrictions regarding how those low-impact activities can or can't be carried out. Any such restrictions could be dependent on the specifics of the values at the particular sites that need to be protected (for example, no access to specific sites at certain times of the year corresponding to raptor nesting).** In the case of rock-climbing, see recommendation 3.2.

### 3.2 Climbing area classifications

There is a need for a category of climbing areas where climbing is allowed but with particular restrictions – this would allow climbing to occur contingent on specified restrictions that are appropriate for the specifics of the site or sites in question.

- **VCC recommends that Parks Victoria add another category - Designated Climbing Area with Restrictions - to the four categories used in the Plan to classify climbing area.**

### **3.3 Climbing areas defined in the Plan – the benefits of further subdivision**

There is a need for a more granular/geographically specific break up of areas into appropriate sectors. Where there are sectors where no cultural values or particular environmental sensitivities have been identified, these sectors could be re-classified to allow climbing.

Similarly, for areas yet to be assessed, some of these should be subdivided into smaller sectors. That way, future re-discoveries of cultural values in a large area, as currently defined, does not automatically lead to exclusions from all of the sectors within that area.

Of course, Traditional Owners will be the ones who will decide what needs to be protected and how close is too close.

- **VCC recommends that Parks Victoria adopts an approach of breaking up large climbing areas into smaller sectors for climbing access classification purposes.**

**Such an approach would result in greater climbing access than would be delivered by a classification system overlaid on a lesser number of larger areas. It can be achieved without any negative impacts on environmental and cultural values protections.**

**It would, consequently, also ensure that fewer climbing tourists are deterred from visiting the region and more tourist dollars would flow into the region than would be the case if prohibitions were based on larger areas.**

### 3.4 Access tracks to climbing and bouldering areas

If any recreational user group, such as walkers, find a particular place is an enticing attraction and large numbers of people want to visit it (consider, for a Gariwerd example, The Grand Canyon/Wonderland or any of the easily accessible rock pools or waterfalls close to Halls Gap) ***a proactive land manager will head off the track proliferation problem by mapping out and constructing an approach track that can handle the foot traffic, that is designed to pre-empt erosion problems, that will endeavor to avoid sensitive areas, and will channel people away from using other possible approaches across more sensitive ground.*** From a land management and conservation point of view, this is 'best practice'.



*Figure 11: A Parks Victoria sign pointing the way for thousands of climber access visits to Taipan Wall. Ground compaction and erosion problems could be easily rectified by a simple, appropriately designed and carefully constructed track.*

Of course, making any tracks causes some environmental damage (a recent salient example is the construction of the Grampians Peaks Trail - VCC is appalled at the scale of the earth works and steel works associated with the GPT. These works include not just those along the track itself but also the quarrying of rock throughout the surrounding bush. We believe the scale of impact of the GPT is in the order of a hundred times greater than that of all climbing in Gariwerd).



*Figure 12: Work on the Grampians Peak Trail*

Nonetheless, the creation or upgrade of a limited number of thoughtfully considered, well designed and appropriately constructed tracks to popular cliff-sites, and staging areas at cliff bases, would deliver a number of desired outcomes:

- The pre-empting/avoiding of possible future damage (broken branches, rock cairns or tape markers, erosion issues) that can occur on informal trails to cliffs. Such formally constructed tracks would, of course, be designed to avoid sensitive areas (environmental or cultural values), pre-empt/avoid track proliferation problems and result in a win-win for land managers and recreational users of the Park.
- Assuming concerns about impacts on environmental or cultural values can be adequately ameliorated by upgrading informal trails or replacing them with well-constructed (and perhaps re-aligned) tracks, and this enables climber access to a number of popular cliffs to be allowed, this would no doubt attract a

significantly large number of climbing tourists back to the region from Victoria, Australia and around the world.

**VCC recommends that Parks Victoria adopt this approach of constructing a limited number of cliff access tracks and cliff base staging areas as soon as possible.**

**To this end, it recommends that Parks Victoria:**

- collaborates with the climbing community to establish a list of appropriate climbing sites where this approach - constructing appropriate approach tracks from existing PV tracks or roads to appropriate 'staging areas' at the base of crags or bouldering areas - could be employed, and**
- develops a priority list that ensures that any track construction timeline gives preference to suitable climbing sites that are also very popular and for which reinstated access would likely bring most visitors back to Gariwerd.**

### **3.5 Access to climbing for people with disabilities**

**Given that the intended prohibitions outlined in the draft Plan leave extremely limited options for people with disabilities wanting to climb, Parks Victoria should reconsider the prohibitions for climbing at sites that would be particularly suitable and where any risks of harm to environmental or cultural values could be readily mitigated.**

Back Wall at Summerday Valley is one of the very few options for individuals who struggle to walk any significant distance but who have the ability to climb easy grade climbs.

A Parks Victoria track goes to the very foot of this wall. A wood and wire fence beside the track keeps people out of the valley floor that separates them from the Wall of Fools where there are examples of tangible cultural heritage in the form of quarried edges. This fence also keeps people out of the scrub of the valley floor where there could be waste rock fragments left over from the stone-working processes (see Figure 13).

Currently, people with disabilities who don't have the financial wherewithal to continually pay for LTOs every time they want to climb there are excluded from participating in this activity.



*Figure 13 – the base of Back Wall at Summerday Valley. Note the stonework constructed by Parks Victoria and CliffCare at the base of climbs. Note also the wood post and wire fence that separates the public from the regrowth in the valley floor and from the quarry sites across the valley at Wall of Fools.*

### 3.6 Stewardship and ongoing collaborative partnerships with climbers

Climbers have a rich legacy of working collaboratively with land managers to preserve the environmental and cultural values of the parks in which they climb.

- **It is recommended that Parks Victoria includes within the GGLMP a commitment to genuine collaboration with climbers and other recreational user groups.**

**Ideally, such a commitment would be characterized by**

- **regular dialogue with representatives of recreational user groups (in lieu of a peak body for climbers, the logical 'go to' groups for land managers wanting considered and constructive input from climbers would be those bodies most representative of the broader climbing community; VCC - including CliffCare - and Crag Stewards Victoria) and**
- **a focus on all parties alerting each other about potential problems and on forward planning and collaboration in order to pre-empt or mitigate any such problems.**

Such collaboration could be leveraged to provide the necessary input in relation to recommendations 3.4, 3.9 and 3.12.

Ongoing liaison would better enable solutions to be developed that would likely be more efficacious and satisfactory to both the land managers and the recreational groups who visit Gariwerd.

### 3.7 Bouldering

Many boulders and bouldering sites, including some of the most celebrated, world-famous boulder problems, are not located immediately near the base of roped climbing sites.

- **It is recommended that any 'standalone' boulders that don't happen to be located close to a roped climbing area are not automatically excluded from consideration as a potentially appropriate and legitimate bouldering site.**

Many bouldering sites are relatively close to Parks Victoria walking tracks and also happen to have rock bases where ground compaction is not an issue.

- **It is recommended that such sites are prioritized for assessment, whether they be in Designated Climbing Areas or not and, where there is deemed to be no significant risk to environmental or cultural values, bouldering is allowed.**
- **It is also recommended that, where assessments of bouldering sites indicate that a particular site cannot adequately handle lots of boulderers simultaneously, measures to limit numbers be considered in preference to a blanket ban on bouldering at the site. Such measures could include a specified 'cap' or maximum number of boulderers allowed at the site at any one time, or of a maximum number of bouldering mats at the site at any one time, or physical barriers that constrain/prevent the overflow of spectators into the immediate surroundings.**

### **3.8 Maximising economic benefits of climbing tourism into the region**

Given the considerable contributions that climbing tourism makes to the regional economy, land managers need to be cognizant of the deterrent effect that widespread climbing bans will have on climbing tourism to Gariwerd and the consequent potentially severe negative economic impacts that such bans will have on the region.

***It is incumbent on land managers to consider and adopt methods of protecting environmental and cultural heritage values that can achieve such protections without requiring***

***large-scale blanket bans on any group or groups of recreational users, wherever this is possible.***

Access restrictions, where these are the only means of achieving robust environmental or cultural protections, should be geographically fine-grained and tailored to the specifics of the various sites being protected. **To this end, VCC recommends a number of approaches that PV could consider adopting that, together, could achieve stout cultural values protections and environmental protections and prove far less of a deterrent to climbing tourism than the current draft proposals.**

**Specifically, VCC recommends that Parks Victoria:**

- **accepts feedback from climber representatives to help inform priority lists of climbing sites and bouldering sites for assessment of cultural and environmental values.**

The lists in Appendix 6 could provide a useful starting point.

- **adopts suggestion 3.3 (very large areas, as currently classified, should be divided for assessment purposes into a number of smaller sites), wherever practical.**

Climbers are aware that there will undoubtedly be some sites that have value because of their part in a larger surrounding cultural landscape (and therefore should be viewed as an integral part of it).

Nonetheless, there will undoubtedly be other sites that could be subdivided from the larger areas that they are currently categorised as part of, and where climbing could occur without any risk of harm to cultural or environmental values.

- **works to expedite such assessments as soon as possible with a view to allowing climbing access to those sites where there is no identified cultural values and no significant threats to environmental values.**

**Such a clutch of recommendations has the potential not only to protect the unique environmental and cultural values of Gariwerd but also protect the reputation of Gariwerd as a world-class climbing destination and protect the contributions of climbing tourism to the regional economy.**

### **3.9 Safety bolts - decision making in regard to any additions or replacements**

**The VCC proposes that Parks Victoria jettisons its proposal to “Close any climbing areas where unauthorised replacement or addition of anchors occurs” (p107).**

**Instead, VCC proposes that Parks Victoria sets up an advisory body for the purpose of vetting/assessing proposals that climbers might put forward in regard to the installation, removal or replacement of fixed safety infrastructure, or for the development of any ‘new’ climbing sites.**

**It recommends that this advisory board be made up of a small number of experienced climber representatives and a small number of land manager representatives. This body would meet periodically for the sole purpose of assessing and making recommendations on any such proposal to the land managers of the Grampians/Gariwerd National Park and nearby state parks in the Gariwerd landscape. The land managers of these parks would then make informed decisions on whether the various recommendations are accepted or rejected.**

This approach has been and continues to be successfully used by a number of land managers around the planet.

The example of the Action Committee for Eldorado (ACE), in Colorado is illustrative of the approach taken in many parks across the United States to regulate the installation, removal or replacement of fixed climbing protection. See Appendix 5.

### **3.10 Proposal for removal of fixed protection from areas/sites where future climbing will be prohibited**

Removal of fixed protection, if carried out by individuals or groups without the prerequisite knowledge and skills to complete such a task in ways sympathetic to the rock to which the protection has been affixed, runs a significant risk of causing irreparable harm to the rock.

**It is recommended that any removal of fixed protection be carried out by professionals who have extensive experience and expertise in the removal of various types of fixed protection and who can ensure that such removal is completed with minimal trace.**

### **3.11 An alternative to mandatory permits to climb in Designated Climbing Areas**

**The VCC recommends that Parks Victoria jettisons its proposal to require all climbers to get a permit to climb, boulder or abseil in the greater Gariwerd landscape. Instead, the VCC recommends that Parks Victoria works with the climbing community, particularly Crag Stewards Victoria, to develop an appropriate on-line induction module for climbers planning to climb, boulder or abseil in the Gariwerd landscape. This could be promoted by all climbing clubs in Victoria, advertised in climbing gyms and online climbing websites and forums, and actively supported by Parks Victoria and Crag Stewards Victoria.**

The VCC's view is that such a pro-active, educational approach that fosters shared beliefs and actions that are concordant with the protection of environmental and cultural values, is likely to be far more effective than a punitive approach relying on fear of being fined for non-compliance with a discriminatory permit system.

### **3.12 Permits in currently proposed LTO-only areas**

**It is recommended that Parks Victoria implement a system or mechanism that would enable climbing clubs or organisations to operate in a similar vein to Licensed Tour Operators in areas where it is currently intended (according to the Plan) that only LTOs and their clients can climb.**

Such a system or mechanism would allow clubs or organisations to apply to run club trips on the strict proviso that all participants abide by prescribed rules and behaviors. Land Managers could stipulate, for example,

- maximum numbers of participants allowed for each such trip/visit,
- that participants agree to abide by specified codes of conduct and only climb in tightly defined areas.
- that trip leaders successfully complete recognised inductions in regard to environmental and/or cultural values.
- that all trip participants complete a briefing that could include information related to environmental and cultural values in the area concerned.

### **3.13 A process for assessing the appropriateness of allowing the development of potential new climbing sites**

Developing climbing in areas where there are no cultural heritage values or any likelihood of significant negative environmental impacts should be allowed.

Such development would take the pressure off the hugely decreased number of sites where climbing will be allowed (the Designated Climbing Sites).

It could help offset the impacts of the prohibition of climbing from other sites where cultural and environmental sensitivities have been identified.

**The VCC recommends that Parks Victoria sets up an advisory body (which would, ideally, include climber representatives and land manager representatives) which can look at any applications for the development of new climbing areas and assess these applications on their merits.**

**Such an advisory body could either be the same body as that which we have recommended in relation to assessing applications in regard to installing, replacing or removing fixed safety infrastructure (climbing anchors) – see recommendation 3.7 - or could be a separate body.**

**Such an advisory body does not make decisions. It makes recommendations to the land managers who make the decisions.**

### **3.14 A process for regular engagement and pro-active collaboration with recreational user groups.**

**Parks Victoria should articulate and commit to a mechanism for regular engagement and pro-active collaboration with recreational user groups, including with the climbing community, in the Plan.**

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# Appendices

## Appendix 1 – harm to cultural and environmental values in the Gariwerd Landscape

The greatest amount of harm done to cultural values or environmental values by people recreating in Gariwerd is done by casual tourists accessing sites via Parks Victoria walking trails.

It is of note that Parks Victoria makes it clear (in the draft *Rock Climbing Decision Framework for the Gariwerd landscape* document) that

“Where the land manager does not have the resources to actively manage a site where values are present, the site will be closed to rock climbing”.

Yet the same approach is seemingly deemed not to be appropriate for walking despite overwhelming evidence of Parks Victoria’s inability to manage sites where walkers continue to cause significant harm to cultural and environmental values.

Figure 14 – harm to cultural heritage very close to the walking track at **Beehive Falls**



Handprint covered  
in graffiti



Figure 15 – **Hollow Mountain** – cultural and environmental values, accessible via Parks Victoria tracks, compromised by numerous examples of graffiti, litter, and illicit campfire remains.

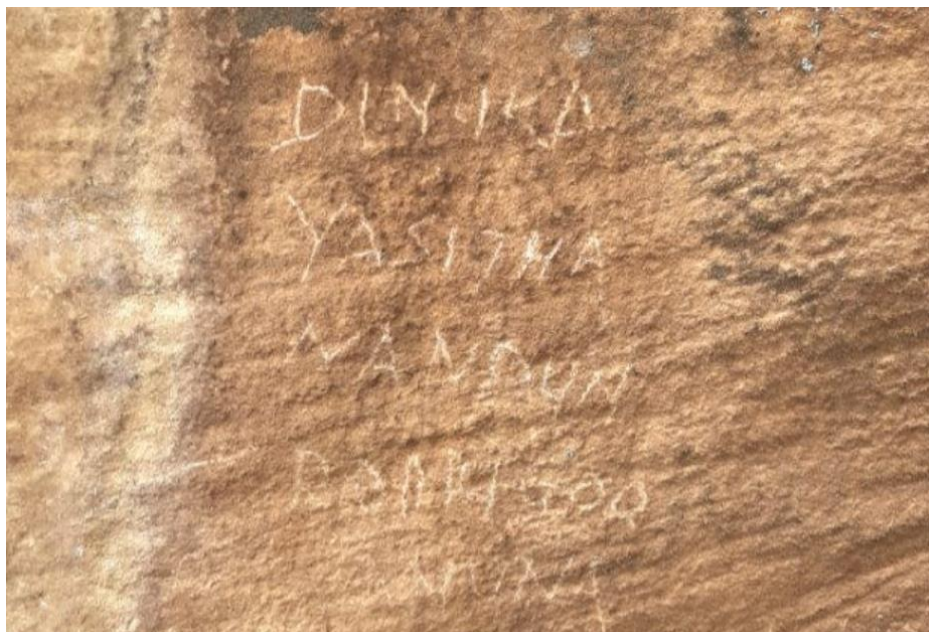


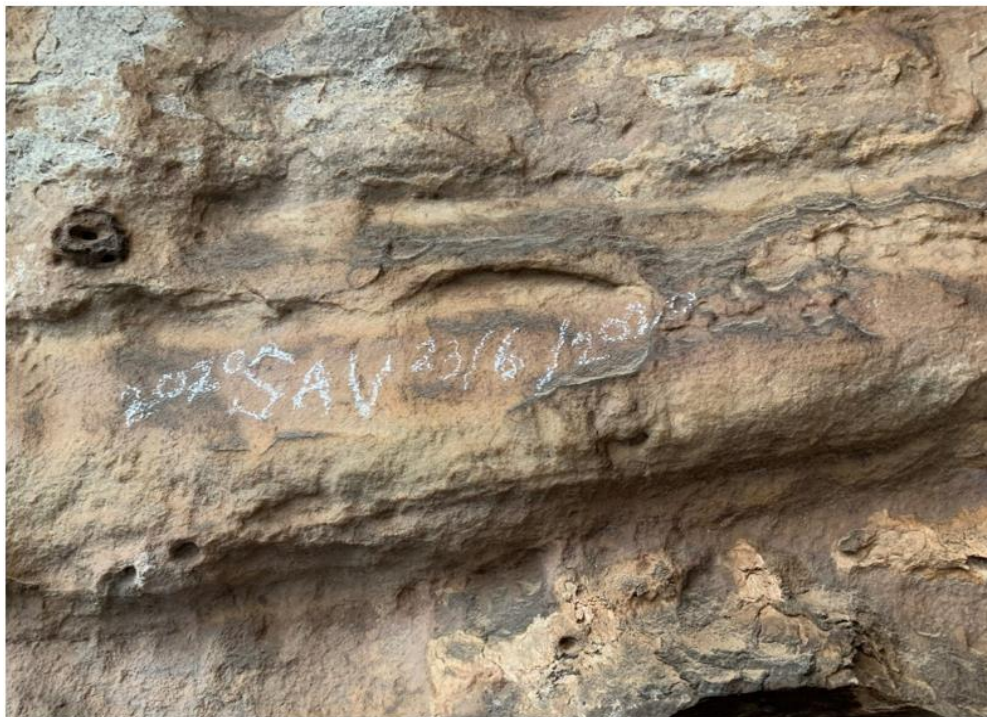


Figure 16 – more graffiti very close to cultural heritage, **Hollow Mountain** walking track

Figure 17 – graffiti very close to cultural heritage, PV sanctioned campsite on **The Fortress** walking track.



Figure 18 - **Manja Shelter** – examples of graffiti very close to cultural heritage



## Appendix 2

**Table A2 Climbing areas not in the Plan**

Climbing Area	General location	Guidebook
2 <sup>nd</sup> Dial	Seven Dials Range	Southeast Grampians, Baxter, 1991
3 <sup>rd</sup> Dial		
4 <sup>th</sup> Dial		
5 <sup>th</sup> Dial		
Alex Creek	Upper Alex Creek	The Victoria Range, Loughran, 1986
Alex Creek Tiers	Alex Creek Sth	The Definitive Victoria Range guidebook, Hampton
Alpenglow Rock	Ostler's Road 37°04'58.6"S 142°30'32.4"E	
Apocalypse Walls	Roses Gap Area 36°57'23.1"S 142°26'25.0"E	
Asses Ears:	Asses Ears region	Sublime Climbs, Lindorff et al., 2011
Main Face		Asses Ears Area, Donohue, 2000
Summit Track Wall		
Dead Ahead Cliff		
Schroeder's cliff		
Top of the Range Wall		
Asses Ears Southern Face	Asses Ears region	Asses Ears Area, Donohue, 2000
Baby Buttress	Graham's Creek Area	The Definitive Victoria Range guidebook, Hampton
Back and Beyond	Eagle's Head Summit	The Definitive Victoria Range guidebook, Hampton
Ball Bag	Red Rock Creek Area	The Definitive Victoria Range guidebook, Hampton
Banksia Buttress	Golton – North 36°54'56.3"S 142°25'16.0"E	
Barr's Buttress	Roses Gap Area 36°57'49.3"S 142°26'12.7"E	

<b>Climbing Area</b>	<b>General location</b>	<b>Guidebook</b>
Beardstroker Hill	No 1 Creek/ Deathmarch Track area	The Definitive Victoria Range guidebook, Hampton
Bechervaise Rocks	Central Grampians	Central Grampians, Vol 2, Toal
Besser Buttresses	Waterworks Track	The Definitive Victoria Range guidebook, Hampton
Big Wall / Stumpytail Rock	Alex Creek South	The Definitive Victoria Range guidebook, Hampton
Billabong Block	Scoop Rocks Area	The Definitive Victoria Range guidebook, Hampton
Billywing Bluff	Buandik Area	The Definitive Victoria Range guidebook, Hampton
Blazed Rock	Pomonal Area -37.18690, 142.57825	Central Grampians, Vol 1, Toal, 2019
Blink Buttress	Golton - South 36°55'37.2"S 142°25'34.0"E	
Boot Hill	No 1 Creek/ Deathmarch Track area	The Victoria Range, Loughran, 1986
Bosch Wall	Geerak Track North	The Definitive Victoria Range guidebook, Hampton
Breeders Wall	Scoop Rocks Area	The Definitive Victoria Range guidebook, Hampton
Briggs Bluff East	Mt Difficult Range 36°58'59.3"S 142°27'50.2"E	The Mt Difficult Range, McIntosh, Andrews, 1999
Briggs Bluff North	Mt Difficult Range 36°58'44.7"S 142°27'29.7"E	
Brim Creek	Asses Ears region	The Asses Ears Area, Donohue, 2000
Brim Springs/ Geranium Springs		The Asses Ears Area, Donohue, 2000
Brown Creek Gorge	Brown Creek	The Definitive Victoria Range guidebook, Hampton
Buandik	Buandik Area	The Victoria Range, Loughran, 1986

<b>Climbing Area</b>	<b>General location</b>	<b>Guidebook</b>
Buffoon Block	Buandik Area	The Definitive Victoria Range guidebook, Hampton
Bundlethere	Bundaleer area	Central Grampians, Vol 2, Toal
Burke's Backyard	Central Grampians	Central Grampians, Vol 2, Toal
Canyon Crag	Red Rock Creek Area	The Definitive Victoria Range guidebook, Hampton
Cape Canaveral	The Mount Difficult Range	The Mt Difficult Range, McIntosh, Andrews, 1999
Carter's Col	Roses Gap Road 37°03'13.6"S 142°25'43.4"E	
Castle Creek	Central Grampians	Central Grampians, Vol 2, Toal
Castle Creek Upper	Central Grampians	Central Grampians, Vol 2, Toal
Cave Cliff (Wave Wall)	Golton – North 36°54'02.9"S 142°24'50.9"E	Grampians Climbing, Monteith, 2015
Centipede Gully	Northern High Tops	The Definitive Victoria Range guidebook, Hampton
CG Wall	Southern High Tops	The Definitive Victoria Range guidebook, Hampton
Chasm Saddle Slabs	Buandik Area	The Definitive Victoria Range guidebook, Hampton
Chatterbox Rocks	Roadside Crag Area	The Definitive Victoria Range guidebook, Hampton
Cinders Block	Heatherlie area, 36°59'59.0"S 142°28'47.0"E	
Cliff Richard	Central Grampians	Central Grampians, Vol 2, Toal
Cliff Young	Central Grampians	Central Grampians, Vol 2, Toal
College Wall	Alex Creek Sth	
Conservative Crag	Heatherlie Area 37°00'11.5"S 142°28'51.5"E	

<b>Climbing Area</b>	<b>General location</b>	<b>Guidebook</b>
Coppermine Cliff	Golton – South 36°55'37.0"S 142°25'24.6"E	
Coup de Grace Wall	Mt Difficult area	Sublime Climbs, Lindorff et al., 2011
Craigend	Southern High Tops	The Definitive Victoria Range guidebook, Hampton
Crank Start Amphitheatre	Mt Stapylton /Hollow Mtn area -36.8914, 142.3822	Grampians Climbing, Monteith, 2015
Crawford's Crag	Bullawin Track, south of Chimney Pots	The Victoria Range, Loughran, 1986
Crazed Rock	Pomonal Area	Central Grampians, Vol 1, Toal, 2019
Cub Wall	Mount Fox Area	The Definitive Victoria Range guidebook, Hampton
Cultivation Crag	Northern High Tops	The Definitive Victoria Range guidebook, Hampton
Cyclops Wall	Bullawin Track	The Victoria Range, Loughran, 1986
Crystal Palace	Southern High Tops, Victoria Range	Grampians Selected Climbs, Tempest and Mentz, 2001
Cub Wall	Mount Fox Area	The Victoria Range, Loughran, 1986
Dazed Rock	Pomonal Area	Central Grampians, Vol 1, Toal, 2019
Dead Explorers Slab	Eagle's Head Summit	The Definitive Victoria Range guidebook, Hampton
Deathmarch Wall	No 1 Creek/ Deathmarch Track area	Grampians Selected Climbs, Tempest and Mentz, 2001
Deep Creek		The Victoria Range, Loughran, 1986
Deep Creek Walls	Briggs Bluff area 36°59'51.9"S 142°27'45.5"E	
Devil's Peak	Wonderland Range	Central Grampians, Vol 1, Toal, 2019
Diseased Wall	Graham's Creek Area	The Definitive Victoria Range guidebook, Hampton

<b>Climbing Area</b>	<b>General location</b>	<b>Guidebook</b>
Distortion Wall	Roses Gap Road 36°59'18.0"S 142°27'04.1"E	
Dragon Wall	Mosquito Creek Area	
Eagle's Head Summit Slabs	Eagle's Head Summit	The Definitive Victoria Range guidebook, Hampton
Egypt	Pines Road 37°03'45.9"S 142°30'26.6"E	
Elephant's Foot	Central Grampians	Central Grampians, Vol 2, Toal
Emu Cave	Victoria Range, -37.2117, 142.2679	Grampians Climbing, Monteith, 2015
Epacris Cliffs		Southeast Grampians, Baxter, 1991
Epaminondas buttress	Mount Difficult area 37°01'23.2"S 142°26'06.0"E	Sublime Climbs, Lindorff et al., 2011
Falcon's Lookout	Red Rock Road North	The Definitive Victoria Range guidebook, Hampton
Feral Black Cat Walls	Roses Gap Area 36°57'25.0"S 142°26'32.0"E	
Ferret Hill	Upper Alex Creek	The Victoria Range, Loughran, 1986
Fossil Rock	Mosquito Creek Area	The Definitive Victoria Range guidebook, Hampton
Flame Wall	Graham's Creek Area	Grampians Climbing, Monteith, 2015
Foxy Rocks	Mount Fox Area	The Definitive Victoria Range guidebook, Hampton
Freestone Rocks	Mosquito Creek Area	The Definitive Victoria Range guidebook, Hampton
Gap Hill	Geerak Track North	The Definitive Victoria Range guidebook, Hampton
Gastronomique Wall	Slander Gully Area	The Definitive Victoria Range guidebook, Hampton
Goat Wall	Northern High Tops	The Definitive Victoria Range guidebook, Hampton

<b>Climbing Area</b>	<b>General location</b>	<b>Guidebook</b>
Gog Magog Crag	Access Halls gap – Mt Zero Rd	A Rock Climber's Guide to the North Grampians, Andrews, 2000
Goldirocks	Waterworks Track Native Pines Creek area	The Victoria Range, Loughran, 1986
Golton Gorge	Golton –South 36°55'24.3"S 142°25'29.6"E	
Golton Wall	Golton – North 36°55'18.7"S 142°25'30.6"E	
Good Friday Gully	Graham's Creek Area	The Definitive Victoria Range guidebook, Hampton
Graham's Creek	Graham's Creek Area	The Victoria Range, Loughran, 1986
Green Gully Area	Buandik Area	The Definitive Victoria Range guidebook, Hampton
Guernica Block	Mt Stapylton /Hollow Mtn area -36.8912, 142.3811	Grampians Climbing, Monteith, 2015
Gully Cliffs South	Heatherlie Area 37°00'15.2"S 142°28'52.5"E	
HB Wall	Eagle's Head Summit	The Definitive Victoria Range guidebook, Hampton
Hidden Buttress	Victoria Gap Crag	The Definitive Victoria Range guidebook, Hampton
High Cirque	Red Rock Road North	The Definitive Victoria Range guidebook, Hampton
High Wall	Red Rock Road North	The Definitive Victoria Range guidebook, Hampton
Hindu Kush	Alex Creek South	The Definitive Victoria Range guidebook, Hampton
Hollywood Valley	Mount Fox Area	The definitive Victoria Range guidebook, Hampton
Isolation Wall	Scoop Rocks Area	The Definitive Victoria Range guidebook, Hampton

<b>Climbing Area</b>	<b>General location</b>	<b>Guidebook</b>
Jurassic Park	Northern High Tops	The Definitive Victoria Range guidebook, Hampton
Kaitland	Victoria Range Track North	The Definitive Victoria Range guidebook, Hampton
Keeyuga Cathedral	Northern High Tops	The definitive Victoria Range guidebook, Hampton
Kindergarten Wall	Alex Creek South	The Definitive Victoria Range guidebook, Hampton
Koori Country	Central Grampians	Central Grampians, Vol 2, Toal
Latte Land	Scoop Rocks Area	The Definitive Victoria Range guidebook, Hampton
Lego Blocks	Buandik Area	The Definitive Victoria Range guidebook, Hampton
Livingstone	Central Grampians	Central Grampians, Vol 2, Toal
Lizardry Outcrop	Roadside Crag Area	The definitive Victoria Range guidebook, Hampton
Loon Attic	Pines Road 37°04'32.5"S 142°30'29.4"E	
Loose Rock /Candy Outcrop	Mount Fox Area	The Definitive Victoria Range guidebook, Hampton
(The) Lost World:	Victoria Gap Crag -37.1891, 142.2724	Grampians Climbing, Monteith, 2015
Orinoco Flow area		
Upper right cliff		
Indiana Jones area		
One Small Step area		
Machu Picchu	Geerak Track North	The Definitive Victoria Range guidebook, Hampton
Magic Mountain	Northern High Tops	The Definitive Victoria Range guidebook, Hampton
Maiden's Delight	Golton –South 36°56'02.5"S 142°25'47.1"E	

Climbing Area	General location	Guidebook
Mawson Slab	Roses Gap Road 37°01'37.6"S 142°26'06.0"E	
McDonald Creek Gorge	McCutchen's Road	The Definitive Victoria Range guidebook, Hampton
Meaty Nipples Block	Slander Gully Area	The Definitive Victoria Range guidebook, Hampton
Meteorological Wall	Mountain Lion Area	The Definitive Victoria Range guidebook, Hampton
Middle Ages	Bullawin Track	The Definitive Victoria Range guidebook, Hampton
Minmin Hill	Roadside Crag Area	The Definitive Victoria Range guidebook, Hampton
Mordor	Between Deep Creek and Hut Creek	The Definitive Victoria Range guidebook, Hampton
Mount Abrupt – Southern, Middle and Northern Cliffs	Serra Range	Southeast Grampians, Baxter, 1991
Mount Bloody Impossible	Roses Gap road 37°00'27.4"S 142°26'21.7"E	
Mount Cactus	Muline Creek Area	The Definitive Victoria Range guidebook, Hampton
Mount Difficult	Mt Difficult range	Sublime Climbs, Lindorff et al., 2011
Mount Emu (Noddy's Cliff)	Access from Smith Road	A Rock Climber's Guide to the North Grampians, Andrews, 2000
Mount Frederick	Serra Range	Southeast Grampians, Baxter, 1991
Mount Thackery		The Victoria Range, Loughran, 1986
Mount William		Southeast Grampians, Baxter, 1991
Nearby Crag	Hut Creek area	The Definitive Victoria Range guidebook, Hampton
New Era Wall	Golton – North 36°53'57.4"S 142°24'50.1"E	

<b>Climbing Area</b>	<b>General location</b>	<b>Guidebook</b>
Norman Neve Memorial Pinnacle area	Northern High Tops	The Definitive Victoria Range guidebook, Hampton
Nottle Rocks (Denied Walls)	Waterworks Track	The Definitive Victoria Range guidebook, Hampton
Nowhere Crag	Roadside Crag Area	
Occupational Hazard	Golton – South 36°55'51.3"S 142°25'19.0"E	
Off Road Walls	Roadside Crag Area	The Definitive Victoria Range guidebook, Hampton
Outsider Rocks	Upper Alex Creek	The Definitive Victoria Range guidebook, Hampton
Orange Blossom Wall	Mt Stapylton /Hollow Mtn area	Sublime Climbs, Lindorff et al., 2011
Party Wall	Northern High Tops	The Definitive Victoria Range guidebook, Hampton
Pinnacle of Achievement	Buandik Area	The Definitive Victoria Range guidebook, Hampton
Point 630	Bundaleer Area	Central Grampians, Vol 2, Toal
Pot Wall	Roadside Crag Area	The Definitive Victoria Range guidebook, Hampton
Prism Wall	Victoria Gap Crag	The Definitive Victoria Range guidebook, Hampton
Pygmy Terraces	Northern High Tops	The Definitive Victoria Range guidebook, Hampton
Quarry Hill	Halls Gap area 37°07'26.3"S 142°31'35.2"E	
Quartz Bluff	Buandik Area	The Definitive Victoria Range guidebook, Hampton
Quartz Edge	Southern High Tops	The Definitive Victoria Range guidebook, Hampton
Random Rock	Scoop Rocks Area	The Definitive Victoria Range guidebook, Hampton
Red Cave	Hut Creek area	The Definitive Victoria Range guidebook, Hampton
Red Sail	Victoria Range, -37.1966, 142.2823	Grampians Climbing, Monteith, 2015

Climbing Area	General location	Guidebook
Red Light Buttress	Pohlner – East 36°57'22.0"S 142°25'24.0"E	
Redman's Bluff		Southeast Grampians, Baxter, 1991
Renaissance Walls	No 1 Creek/ Deathmarch Track area	The Definitive Victoria Range guidebook, Hampton
Rhino's Horn	Victoria Range Track South	The Definitive Victoria Range guidebook, Hampton
Roadside Crag	Roadside Crag Area, off Geerak Track, S of Glenelg River Rd	The Victoria Range, Loughran, 1986
Roadside Creek Ravine	Roadside Crag Area	The Definitive Victoria Range guidebook, Hampton
Roadside Prow Area	Roadside Crag Area	The Definitive Victoria Range guidebook, Hampton
Sawmill Cliff	Sawmill Track	The Victoria Range, Loughran, 1986
Secret Crag	Asses Ears Area	
Shallow Grave Cliff	Red Rock Road North	The Definitive Victoria Range guidebook, Hampton
Shangri-La	Mt Stapylton Area -39.9088, 142.3928	Grampians Climbing, Monteith, 2015
Sickle Wall	Roses Gap Road 37°01'44.0"S 142°26'01.8"E	
Small Block	Scoop Rocks Area	The Definitive Victoria Range guidebook, Hampton
Smallgoods Area	Graham's Creek Area	The Definitive Victoria Range guidebook, Hampton
Sports Wall	No 1 Creek/ Deathmarch Track area	The Definitive Victoria Range guidebook, Hampton
Sunset Crag:	Asses Ears region	The Asses Ears Area, Donohue, 2000
Left-hand Cliff		
Central Cliff		
Right-hand Cliff		

<b>Climbing Area</b>	<b>General location</b>	<b>Guidebook</b>
Swamp Wall	Alex Creek South	The Definitive Victoria Range guidebook, Hampton
Taj Mahal	Northern High Tops	The Definitive Victoria Range guidebook, Hampton
Teddy Bear Rocks	Just N of Teddy Bear Gap	Southeast Grampians, Baxter, 1991
The Apron	No 1 Creek/ Deathmarch Track area	The Definitive Victoria Range guidebook, Hampton
The Avenue	Southern High Tops	The Definitive Victoria Range guidebook, Hampton
The Back Blocks	Roadside Crag Area	The Definitive Victoria Range guidebook, Hampton
The Battlements	Seven Dial Range	Southeast Grampians, Baxter, 1991
The Buandik Boulder	Buandik Area	The Definitive Victoria Range guidebook, Hampton
The Cat-House	Pohlner – East 36°57'08.5"S 142°25'45.1"E	
The Chilly Bin	No 1 Creek/ Deathmarch Track area	Grampians Climbing, Monteith, 2015
The Crow's Nest	Access from Smith Road	A Rock Climber's Guide to the North Grampians, Andrews, 2000
The End of the Earth	Briggs Bluff area 36°59'14.6"S 142°27'54.0"	
The Eyrie	Access from Smith Road	A Rock Climber's Guide to the North Grampians, Andrews, 2000
The G&T Buttress	No 1 Creek/ Deathmarch Track area	The Definitive Victoria Range guidebook, Hampton
The Gorge	Graham's Creek Area	The Definitive Victoria Range guidebook, Hampton
The Guardians	Wonderland Range	Central Grampians, Vol 1, Toal, 2019

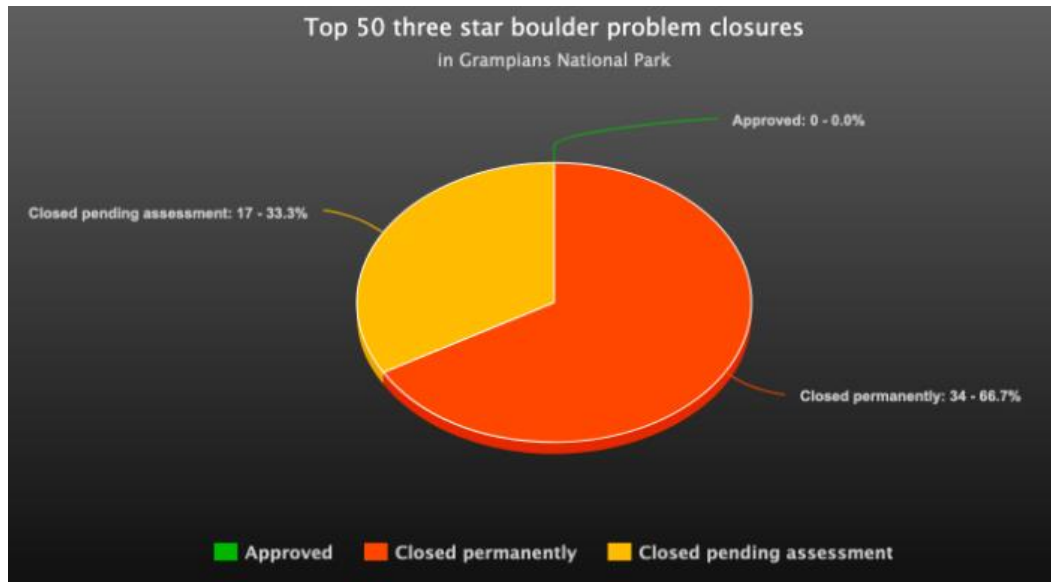
<b>Climbing Area</b>	<b>General location</b>	<b>Guidebook</b>
The Heavens	The Mount Difficult Range	The Mt Difficult Range, McIntosh, Andrews, 1999
The Hindu Kush	Geerak Track	The Definitive Victoria Range guidebook, Hampton
The Labyrinth	Red Rock Road North	The Definitive Victoria Range guidebook, Hampton
The Land that Time Forgot	Heatherlie area 36°59'43.2"S 142°28'26.9"E	
The Locust Towers	Northern High Tops	The Definitive Victoria Range guidebook, Hampton
The Mall	Northern High Tops	The Definitive Victoria Range guidebook, Hampton
The Mangy Kitten	Mountain Lion Area	The Definitive Victoria Range guidebook, Hampton
The Observatory	Wonderland range	Central Grampians, Vol 1, Toal, 2019
The Planetarium	Redman's Bluff Area	Southeast Grampians, Baxter, 1991
The Prow	Scoop Rocks Area	The Definitive Victoria Range guidebook, Hampton
The Rockwall	Roses Gap Area 36°57'32.8"S 142°26'48.9"E	The Mt Difficult Range, McIntosh, Andrews, 1999
The Secret Cliff Area:	Asses Ears region	The Asses Ears Area, Donohue, 2000
The Secret Cliff		
The Top Secret Cliff		
Hidden Wall		
White wall		
The Sheltered Workshop	Buandik Area	The Definitive Victoria Range guidebook, Hampton
The Sun Gate	Golton – North 36°54'01.1"S 142°24'42.4"E	
The Tombstones	Victoria Range Track South	The Definitive Victoria Range guidebook, Hampton
The Tufa Tower	Scoop Rocks Area	The Definitive Victoria Range guidebook, Hampton

<b>Climbing Area</b>	<b>General location</b>	<b>Guidebook</b>
The Turret	Upper Alex Creek	The Definitive Victoria Range guidebook, Hampton
The Watchface	Seven Dials Range	Southeast Grampians, Baxter, 1991
The Workshop	Wonderland Range	Central Grampians, Vol 1, Toal, 2019
The Zumyangs	Asses Ears region 37°05'52.7"S 142°23'46.4"E	The Asses Ears Area, Donohue, 2000
Thylacine Wall	No 1 Creek/ Deathmarch Track area	The Definitive Victoria Range guidebook, Hampton
Tom Tom Cave Area	Muline Creek Area	The Definitive Victoria Range guidebook, Hampton
Troopers Creek Cliff	Roses Gap Road 37°00'56.2"S 142°25'59.2"E	
Ultima Thule	Mosquito Creek Area	The Definitive Victoria Range guidebook, Hampton
Victoria Point Boulders	McCutcheons Road	The Definitive Victoria Range guidebook, Hampton
Victory Wall	Central Grampians	Central Grampians, Vol 2, Toal
Wall of Deceit	Buandik Area	The Definitive Victoria Range guidebook, Hampton
Wallyworld	Graham's Creek Area	The Definitive Victoria Range guidebook, Hampton
War Wall	No 1 Creek/ Deathmarch Track area	The Definitive Victoria Range guidebook, Hampton
Warlu Buttress	Buandik Area	The Definitive Victoria Range guidebook, Hampton
Water Race Wall	Roadside Crag Area	The Definitive Victoria Range guidebook, Hampton
Weetbix Wall	Mountain Lion Area	The Definitive Victoria Range guidebook, Hampton
Western Front	Heatherlie Area 37°00'19.7"S 142°28'58.7"E	

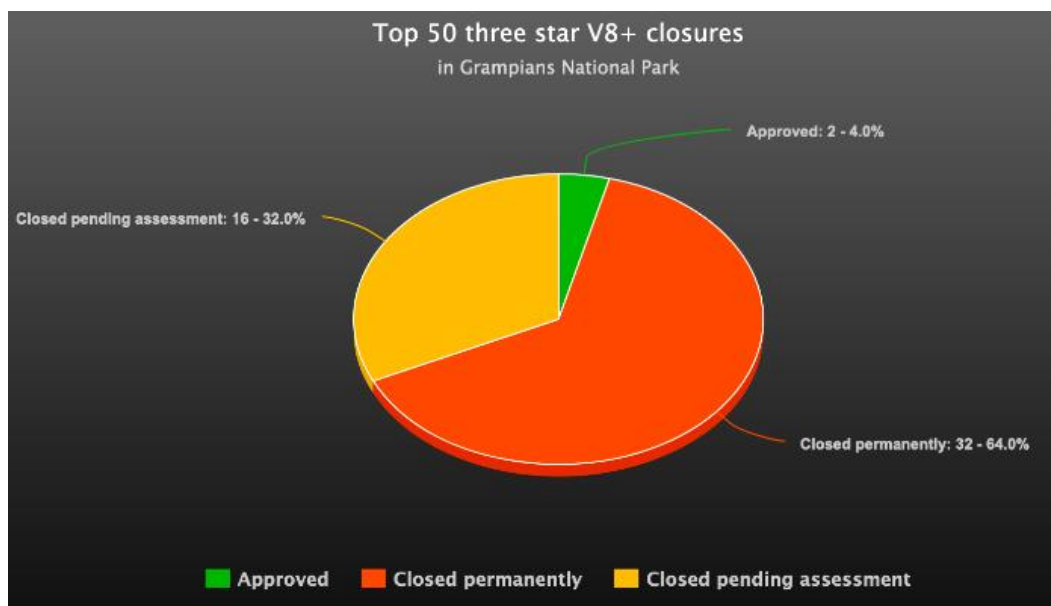
<b>Climbing Area</b>	<b>General location</b>	<b>Guidebook</b>
Western Walls	Roses Gap Area 36°57'26.7"S 142°26'18.2"E	
Wind Cave	Roses Gap Road 37°01'11.8"S 142°25'47.2"E	
World's End	Victoria Range Track South	The Definitive Victoria Range guidebook, Hampton
Worthless Wall	Northern High Tops	The Definitive Victoria Range guidebook, Hampton
Wuss Rocks	Red Rock Road North	The Definitive Victoria Range guidebook, Hampton

## Appendix 3

**Access to the best (3 star) boulder problems according to access status categories as proposed in the draft Plan:**



*Figure 19 – Closures: the best (3 star) boulder problems*



*Figure 20 – Closures: the best of the hardest (V8+) boulder problems*

## Appendix 4

### Errors and erroneous assumptions in the Archaeological Field Survey of Climbing Areas

A report, titled *Archaeological Field Survey of Climbing Areas*, accompanied the launch of the Greater Gariwerd Landscape draft Management Plan (the Plan). It appears that the findings and recommendations of this survey report have significantly informed and influenced the Plan.

For this reason alone, some of the many errors and unjustifiable assumptions that riddle the Archaeological Field Survey document need to be put on the public record.

The types of errors are many and various, but the two main broad categories of errors relate to:

- Unsubstantiated attributions of harm – in a number of examples the authors of the report claim, despite no evidence to back these claims, that climbers have caused particular instances of harm at sites that are co-frequented by general tourists (some of these sites, particularly under overhanging rock shelters, have been used for years by various walkers and school groups as informal walk-in camp sites).
- Erroneous assumptions about what the authors appear to believe are universal climbing practices. These have led to false extrapolations, based on wrong understandings or on obsolete historical practices, and over-statements of risks of harm from climbing.

Examples of unsubstantiated attributions of harm are included with the commentary attached to some of the photos in the report showing markings or graffiti at cliff bases. Mostly, the commentary accompanying these photos simply notes what the damage is, without attribution. However;

- The comment referencing photo 42, for example, falsely states, without any supporting evidence, that the H-shaped mark that has been carved into the rock is a “climbing route marker”. It is not.

Many decades (40-50 years) ago, small painted squares (typically 2cm square) with a climb's initial(s) were occasionally used at some crags to help locate the start of routes. This practice fell out of favour with the environmental 'awakening' during the '70s and would now be universally decried by climbers. It is also now completely unnecessary with the advent of photo-topos used in guidebooks to enable climbers to readily locate climbs.

Yet, despite this fact, and the facts that

- at the cliff in question in this photo (Bundaleer) small paint squares were (historically) sometimes used but such deep scratchings were not,
- there is only one climb at the cliff in question (Bundaleer) with a climb name beginning with the letter 'H' and the marking in question is no-where near that climb,
- the cliff is frequently visited by non-climbers and general tourists (whose history of defacing rock and leaving graffiti far exceeds any historical markings left by climbers) and, therefore,
- there is a very high probability that non-climbers have created the mark in question,

the authors of the field survey report still state, confidently but without foundation, that it is a climbing route marker!

- The comment is made, referencing photos such as photos 44 and 45 in the report, that "graffiti was present, some in an elevated position, likely to be accessible only by climbers".

The locations in photos 44 and 45 are easily able to be scrambled to by non-climbers. To pretend otherwise, and imply that climbers were at fault, is not merely disingenuous, it is defamatory to a group of recreational park users.

- A further example of an unsubstantiated attribution of harm and one that shows a lack of understanding of the history of development of walking and climbing in the Grampians over the last forty years is seen in the following excerpt from p23 of the draft Plan:

An 'informal access trail' in this report refers to an unsanctioned route created by park visitors to access parts of the park that lie off-track. Informal access trails are not official or identified walking tracks which have been planned, appropriately authorised and maintained by Parks Victoria. In considering the origin of these trails, it was noted that they were found to only lead to climbing areas and their presence is documented within climbing and bouldering guide books. They are therefore understood to be climbing-related. The trails are subtle and without the published references they would be difficult to detect. The incremental way these trails have developed has led to a complex network of paths that can be found throughout the park. In general, informal markers, a series of small cairns of stones, flagging tape or cuts made to a tree with a sharp implement like an axe or knife have been used to create a directional indicator. The construction of cairns within any National Park is an offence.

A typical trail is no more than 40 cm in width. They typically lead, via the most efficient route, to the base of a cliff and then branch in either direction along the cliff base to various starting points for individual climbs which are also marked. It is estimated that approximately 50% (81 km) of the distance walked in this survey followed informal access trails. The conduct of the survey was quickened by the presence of these informal access trails, which have interconnected climbing areas so that it is possible to loop through several climbing areas without having to retrace the route. A notable example is the connection between the Citadel and Sandinista Cliffs, making it possible to circumnavigate between Mt Zero Carpark and Hollow Mountain Carpark via the south-eastern flank of Gunigalg (Mt Stapylton). This network of informal access trails has come at considerable environmental cost with observed segmentation of the landscape, trampling of vegetation, compaction of soil, introduction of weed species and possible incursion of cinnamon fungus. The trails provide easier access for both humans and pests into the wilder portions of the National Park. Rubbish, toilet paper and faeces were often observed near informal access trails, sometimes hundreds of metres from official walking trails.

The reference to a "notable example ... the connection between the Citadel and Sandinista cliffs ... via the south-eastern flank of Gunigalg (Mt Stapylton)" is bizarre. The trail from Sandinista beneath the series of cliffs that form the south-eastern flank of the mountain ends at a cliff called Van Diemen's Land. Whilst it is possible to walk and link almost any two points on a map, it is of note that between Van Diemen's Land and the Citadel there is no trail.

Two climbers who recently checked this out for this submission each independently verified this. Climbers are NOT approaching Van Diemen's Land via the Citadel (or The Citadel via Van Diemen's Land) – it makes no sense, as the approach is much longer and more strenuous than the approach to Van Diemen's Land via Sandinista.

There is a walking circuit in this area that goes via the Parks Victoria track through the breach in the cliffs near Sandinista, up over Hollow Mountain and along the cliff tops to pick up the PV walking track to continue past the Citadel and eventually down and around beneath Lower Taipan Wall and down Flat Rock to the Mt Zero carpark. This walking circuit did not have its genesis as a track used by climbers to "loop through several climbing areas without having to retrace the route."

It was a circuit that gained popularity among walkers who discovered it was one of the best and most exhilarating day walks in Victoria.

See, for example:

<https://www.trailhiking.com.au/stapylyon-ampitheatre/>

<http://osp.com.au/?p=329>

<http://archive.bigben.id.au/victoria/grampians/hollow.html>

Walkers tend to prefer a circuit walk because they do not have to retrace their steps and go over the same ground twice. Climbers, on the other hand, typically want to get to their climbing destination by the shortest walking access available and are happy to retrace the access trail on their way back to the car (i.e. they are primarily there for the climbing, not the walking!).

To imply that climbers have created a circuit in the Mount Stapylton area “so that it is possible to loop through several climbing areas without having to retrace the route” is not only unsubstantiated and shows a lack of understanding of how climbers ‘operate’, like many of the assertions in this report, but is also patent nonsense.

Parks Victoria, to its credit, when unsubstantiated attributions of harm have been brought to its attention by the climbing community over the last 2 years, has endeavored to avoid such statements in various recent community forums and publications (though occasional examples are still ending up in the public domain, such as the reference to the “deliberate ... painting with charcoal”, listed under climbing impacts on p102 of the draft Plan).

It is particularly disappointing, therefore, to see the unprofessional, unsubstantiated assumptions and the false attributions of harm continue in the archaeological report that accompanied the launch of the draft Greater Gariwerd Landscape Management Plan.

## Appendix 5

### **An example of an approach to the addition, removal or replacement of fixed protection widely accepted by and managers –Eldorado Canyon, Colorado**

The example of the Action Committee for Eldorado (ACE), in Colorado is illustrative of the approach taken in many parks across the United States to regulate the installation, removal or replacement of fixed climbing protection.

Anyone desiring to install, remove or replace any fixed protection on a cliff in Eldorado Canyon must submit an application to ACE. After considering the climbing community's opinion on the applications, each member of ACE votes whether he or she believes that the climbing community supports the application.

ACE then notifies the Park, and recommends that the Park either approve or deny the application based on the community's position. ACE's recommendation to the Park is advisory only. **The Park reviews the application to determine whether there are any environmental or other conflicts with the application and makes the final decision on whether to approve the application.** It is of note and instructive that the Park has traditionally approved proposals recommended by ACE.

Such an approach, often including representatives of the land managers on the board or committee assessing such applications, is relatively common.

Presumably, if a similar approach was taken to the overseeing of fixed climbing gear in relation to National or State Parks in Victoria, such a committee or board would include experienced climbers, and representatives of Parks Victoria and Traditional Owners.

Thus, Parks Victoria and Traditional Owners could be confident that any recommendations from the committee would have been based on prime considerations of protection of cultural heritage and environment as well as climber safety.

## **Appendix 6 - Suggested assessment priorities**

**Priorities for climbing site assessments** (currently classed as “Possible climbing area – under review” in the draft GGLMP or, in the cases of Asses Ears, Crank Start Amphitheatre, Lost World and Mount Difficult, completely omitted from the draft Plan)

- Asses Ears
- Black Ian’s Rocks
- Cave Cliff / Wave Wall
- Centurion Walls
- Crank Start Amphitheatre
- Cut Lunch Walls
- Dreamtime Wall
- Eagle’s Head
- Eureka Wall
- Lost World
- Millennium Caves
- Mount Difficult – Main Wall
- Mount Difficult – Epaminondas Buttress
- Red Rock Pinnacles
- Taipan Wall
- Weirs Creek

## **Priorities for climbing site re-assessments**

Back Wall (currently LTOs only. Existing track to the foot of the wall is fenced to keep the public out of the valley floor and away from the quarry site at Wall of Fools).

Gilham’s Crag – right-hand sectors only (currently all classed as “Climbing Not Permitted” but the right-hand sectors are significantly distanced from the cultural values that have been identified at the left end of the escarpment).

### **Priorities for bouldering site assessments**

Andersens West (currently listed as "Under Review")  
 Between the Sheeps  
 Cave Club  
 (The) Citadel (currently listed as "Under Review")  
 Dave's Cave  
 Eagle's Nest  
 Epsilon Wall Bouldering (currently listed as "Under Review")  
 Ground Control Caves  
 Loopies  
 (The) Kindergarten  
 Wild Side

Nb., all of the above (apart from Andersens) have rock landings so there are no significant ground compaction or vegetation trampling issues. All are close to existing PV tracks.

### **Priorities for assessment and formalizing of cliff access tracks**

Mt Rosea (to Giant's Staircase)  
 Mt Difficult (re-routing the start of the old track to avoid the cultural heritage at Wind Boulder)  
 Dreamtime Wall  
 Taipan Wall/Spurt Wall

All of the above have formal or informal access tracks in varying states of disrepair. Judicious maintenance/ upgrade could pre-empt future erosion issues at these very popular sites.

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