

Feedback in response to the draft GGLMP

Common themes in feedback from the rock climbing community

Submission from:	Victorian Climbing Club	Australian Climbing Association (Victoria)	Crag Stewards Victoria	M Rockell (850 signatories)	Gariwerd Wimmera Reconciliation Network
Concern/theme					
Lack of peer-reviewed evidence (and consequent mistaken assumptions and erroneous conclusions relating to impacts of climbing and bouldering) that appear to underpin many of the management suggestions in the draft Plan	<p>Notes the inconsistent approaches relating to the management of rock climbing compared to other recreational activities.</p> <p>Also notes that “Some of the apparent assumptions underpinning these intended approaches for managing rock climbing don’t appear based on robust evidence”.</p> <p>Recommends that PV</p> <ul style="list-style-type: none"> • “adopts a less arbitrary approach that can be applied equally to all recreational user groups” and • formulates an evidence-based definition of low impact recreation and allows such low-impact recreation to have access to SPAs. 	<p>Notes that “documentation resulting from surveys commissioned by Parks Victoria depicts impacts, such as historical graffiti, which could not possibly have anything to do with rock climbers, and yet climbers are being blamed”.</p> <p>Insists that P.V. “instigates peer reviews of all archaeological surveys conducted in the Greater Gariwerd region over the last two years, and that these reviews are carried out by independent archaeologists”</p>	<p>Notes that the archaeological survey “has not recognised the historical context of the damage and the absence of knowledge of [the presence of] cultural heritage. It does not properly recognise the damage done by non-climbing visitors [at climbing sites].”</p> <p>“...damage can be eliminated or managed ... with a simple management and education framework”</p>	<p>Recommends that PV makes corrections to unsubstantiated statements it has made which have erroneously assumed and attributed observed negative impacts to be from climbing or climbers [R3]</p>	<p>Not an area of focus</p>

Submission from:	VCC	ACAV	CSV	MR	GWRN
Concern/theme					
No economic impact study(ies) undertaken by PV to ascertain impacts on the climbing community or on the regional economy of the management decisions proposed in the draft Plan	<p>Economic impacts are outlined in detail in the VCC submission.</p> <p>It proposes a clutch of recommendations that will help entice climbers back into the region. These include that PV:</p> <ul style="list-style-type: none"> • accepts feedback from climber representatives to help inform priority lists of climbing sites and bouldering sites for assessment of cultural and environmental values, • divides large climbing areas, for assessment purposes, into a number of smaller sites, wherever practical. • 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 	<p>The ACAV submission notes that there has been some “unhelpful narrative in recent times dismissing the economic impact to the Wimmera should climbing and bouldering become severely impacted under a new management plan”.</p> <p>ACAV points to a report addressing the likely considerable economic impact that could result from widespread climbing prohibitions.</p>	Not an area of focus	<p>Notes that:</p> <ul style="list-style-type: none"> • the estimated direct and indirect rock climbing tourism benefits to the region are substantial, • climbing access changes may also significantly impact employment in the region, and • current climbing prohibitions are having a widespread impact on climbers’ mental health <p>[in contrast, there is no mention in the draft Plan of possible or likely economic, social or mental health impacts of Gariwerd Landscape management decisions]</p>	Not an area of focus

Submission from:	VCC	ACAV	CSV	MR	GWRN
Concern/theme					
Problems with the suggested classification system in the draft Plan for climbing areas	<ul style="list-style-type: none"> • Over 200 areas completely overlooked • Areas too big – should be more fine-grained • There is no category in the draft Management Plan for climbing with site-specific restrictions. Such a category needs to be added 	<p>Advocates “A more nuanced, climb-specific approach ... allowing some climbs to remain open, while other climbs are closed”.</p> <p>Notes that “...this climb-by-climb approach to protection and management is standard practice at climbing locations within national parks around the world”</p>	<p>“CSV proposes an alternative management structure for climbing areas that concentrates resources on high visitation areas:</p> <ul style="list-style-type: none"> • Prohibited Climbing Areas • Managed Climbing Areas • Wild Climbing Areas 	<p>Notes that the Designated Climbing Areas in the draft Plan contain virtually no climbs at the hardest grades, and that sport climbing and bouldering is extremely limited. Recommends that “The Finalised Management Plan should prioritise the urgent assessment and (re)opening of many more locations, especially for bouldering and sport climbing ...”</p>	<p>Puts forward for consideration that ...</p> <p>“the future Landscape Management Plan should involve seeking information about how climbing is practiced at sites with cultural values and whether any mitigation strategies can be mutually agreed upon prior to full exclusion of climbing activities.”</p>
Problems with lack of consideration of bouldering outside of designated roped climbing areas	<p>Recommends that all bouldering sites, whether in designated roped climbing areas or not, need to be assessed on their merits</p>	<p>Access restrictions [presumably in relation to bouldering sites as well as to roped climbing sites] to be workshopped through consultation with climbing groups</p>	<p>The approaches espoused for climbing activities in this submission are assumed to also cover bouldering: allow for bouldering to take place wherever impacts can be effectively managed – by educating boulderers, monitoring sites, communicating with land managers, and working, with permission, on care and maintenance projects.</p>	<p>“Allow for bouldering to properly take place in Gariwerd but develop effective management strategies to minimise the impact” [R10]</p> <p>Asks for seven [specified] bouldering areas to be “subjected to a more detailed reconsideration for becoming Permitted Climbing Locations”. [R6]</p>	

Submission from:	VCC	ACAV	CSV	MR	GWRN
Concern/theme					
Problems/disparities relating to off-track walking – no off-track walking to get to crags, even PV-designated climbing areas (!?!), but no such restrictions placed on the general public	<p>VCC notes the inconsistencies and suggests that if walking off-track is permitted then walking to cliffs off track should be permitted.</p> <p>It recommends that Parks Victoria constructs or formalises a limited number of cliff access tracks and cliff base staging areas as soon as possible.</p> <p>To this end, it recommends that Parks Victoria collaborates with the climbing community to establish priority locations.</p>	<p>“Off-track walking restrictions to be cancelled to allow off-track walking and the use of game trails” [R2.11]</p> <p>“Parks Victoria to work with VCC CliffCare and Crag Stewards Victoria to maintain walking tracks and cliff bases”. [R2.12]</p>	<p>Doesn't focus on disparities of treatment of different recreational groups re off-track walking. Instead, CSV offers, on behalf of the climbing community, to monitor “the condition of the crag and its approach”, to raise potential or emerging issues with land managers and to support land managers with volunteers and resources for approved works (including access tracks)</p>	<p>“Recommend work with climbers to determine effective access tracks and how to mark and maintain them: (p31 of submission).</p> <p>“That the priority for establishing access tracks is to the most popular locations but still allow access to other climbing locations even if no official designated track exists” [R11]</p>	<p>Not an area of focus</p>
No proposed timeframe in the draft Plan for carrying out assessments of yet-to-be-surveyed climbing areas	<p>Notes that</p> <ul style="list-style-type: none"> • Over 300 climbing sites remain to be assessed including approximately 5,000 routes. • PV are unlikely to be able to assess these areas in less than at least another two or three years • significant negative economic impacts on climbing tourism caused by these exclusions will continue for that time. 	<p>“Assessments for Designated Climbing Areas are only partially completed. The red/orange/blue/green cliff designations should not be included in this document, and will be out of date as soon as it is written.”</p>	<p>Not an area of focus</p>	<p>“The finalised Management Plan should prioritise the urgent assessment and (re)opening of many more locations. Especially for bouldering and sport climbing..” [R4]. See also R8</p>	<p>“Once decision-making processes have been settled between Gariwerd Traditional Owners and Land Managers, ...[these] should be made known. This will enable recreational users to address their questions to the correct organisation and allow them to know timeframes for decision making...”</p>

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<p>No commitment by PV to ongoing liaison with climbing community reps (or any other user group reps) to pre-empt problems and develop win-win solutions</p>	<p>VCC recommends that</p> <ul style="list-style-type: none"> • Parks Victoria should articulate in the Plan a mechanism for regular engagement and pro-active collaboration with recreational user groups, including with the climbing community. • Parks Victoria should work with the climbing community to develop priorities for the ongoing assessments of climbing and bouldering areas, and priorities for creating or maintaining crag access tracks • Parks Victoria set up an advisory body, including climbing community representatives, for such purposes as assessing proposals regarding: <ul style="list-style-type: none"> o the installation, removal or replacement of fixed safety infrastructure, o the development of any 'new' potentially appropriate climbing sites. 	<p>ACAV urges PV "to take a fully collaborative approach to consultation with the climbing community, to reach a greater understanding of the range and depth of rock climbing experiences available across Greater Gariwerd."</p> <p>ACAV requests that PV "utilises <i>the Victorian Climbing Management Guidelines</i>" [which itself advocates for an ongoing and proactive collaboration between land managers and the climbing community] and integrates it into the GGLMP.</p>	<p>"We offer a proposal to create individual management plans for each popular climbing area, resourced by the climbing community, to allow the risks and impacts of climbing to be managed appropriately for each area".</p> <p>"CSV encourages Parks Victoria and Traditional Owners of Gariwerd to consider a partnership program with the climbing community that provides a healthy outcome for all."</p>	<p>"Long term active management is needed ... climbers working cooperatively with land managers and other parties into the future [Summary point 4]</p> <p>"That a formalised ongoing consultation arrangement is put in place with representative climbing groups and organisations" [R1]</p> <p>That PV engage with CliffCare and CSV to work to minimise "The impact of climbing on the environment" [R2]</p> <p>See also R7 (a "prioritisation Schedule" for areas designated in the draft Plan as "under review")</p>	<p>The GWRN submission</p> <ul style="list-style-type: none"> • proposes cooperative management solutions • highlights the lack of a stated review mechanism within the plan and encourages one to be developed. <p>Recommends:</p> <ul style="list-style-type: none"> • Clarification of process for developing mitigation measures to allow cultural values and climbing to coexist • Development of a reconciliation-led review mechanism for decisions made • Development of mechanisms to address instances where Traditional Owners/ Land Managers may rely on a trusted third party to manage mitigation of climbing areas • Transparency around decision-making responsibilities between Parks Victoria and Traditional Owners

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The proposed permit system	VCC doubts this would garner adequate support and compliance, particularly when it is seen as unfairly applied to one recreational user group. If the aim is to provide factual information and a clear outline of behavioural expectations, then P.V should develop better options with the climbing community for achieving this aim (e.g. an online induction process actively supported by clubs and the wider climbing community).	ACAV does not support the permit proposal. “The ACAV supports a voluntary online cultural induction process.”	Suggests that a “collaborative approach to cultural training and self-regulation of climber actions and behaviour will provide more effective outcomes with significantly less Land manager resources that a mandatory permit system” Supports the use of, and would promote, “...an on-line induction training module for climbers planning to climb in Greater Gariwerd”	In-principle support, with qualifications	Not an area of focus
Safety infrastructure (fixed protection)	Proposes that Parks Victoria sets up an advisory body (made up of a small number of experienced climber representatives and a small number of land manager representative) for the purpose of 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.	“Safety bolts to be managed and maintained by climbing groups” [R2.7]	Not a major area of focus but suggests that addition of fixed anchors should not be permitted in designated ‘Wild Climbing Areas’ (see CSV’s proposed alternative climbing structure / classification of climbing areas)	“Amend Regulation 53 to specifically allow installation of safety bolts under agreed circumstances” [R12b] “Bolting practices need to be developed in conjunction with the climbing community that are not overly draconian and out of kilter with the very low impact that bolting actually has” [R13]	Not an area of focus