

Namadgi National Park Plan of Management
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**SUBMISSION BY THE CANBERRA CLIMBERS' ASSOCIATION (CCA) ON
THE DRAFT NAMADGI NATIONAL PARK PLAN OF MANAGEMENT
SEPTEMBER 2005**

Thank you for the opportunity to comment on the Namadgi National Park Draft Management Plan. The Canberra Climbers' Association (CCA) endeavours to have an open and collaborative relationship with Environment ACT in promoting good rock climbing practices, and towards the maintenance and management of rock climbing areas within the Namadgi National Park.

In our view, climbing and preserving environmental and cultural values are synonymous. All climbers share a deep love of the environment and are considerate in their impact. However, it is disappointing to see that the strategies espoused in the Draft Plan of Management relating to rock climbing appear to be based on a misunderstanding of the sport of climbing. The strategies as they stand particularly those related to bolting will increase the risk of injury or death, disenfranchise an ally of Namadgi National Park and maybe difficult to implement or enforce.

The CCA urges Environment ACT to adopt a more considered and appropriate strategy for rock climbers and abseilers. The Association would welcome further discussions on any contentious issues.

Yours faithfully,

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28 November 2005

Enclosure:

1. Namadgi National Park: Draft Management Plan. Submission by the Canberra Climbers' Association

Namadgi National Park

Draft Management Plan

Submission by the Canberra Climbers Association

Introduction

Rock climbing as an adventure pursuit is relatively new in Australia but has been practised world wide, particularly in Europe and North America for hundreds of years. Rock climbing and abseiling, derivatives of mountaineering, have evolved into highly technical activities that cater for all levels of ability and skill. Over recent decades, the sport has seen progressive improvements in techniques and equipment that have significantly enhanced safety and reduced the risk of injury or death.

A rich and spirit-filled rock climbing history exists within the boundaries of the Namadgi National Park. Rock climbers have been scaling these granite cliff faces and outcrops for four decades¹, and continue to do so today. Namadgi National Park holds great cultural heritage for generations of climbers and future enthusiasts.

Many of the well-known areas, which are now very popular within the ACT community, were first visited and explored by rock climbers and current members of the CCA. These areas, such as Booroomba Rocks and Orroral Ridge are highly regarded by generations of climbers, not only within the ACT, but Australia wide.

Rock Climbing and Risk

Section 8.5 Recreation objectives and strategies/visitor safety

The Draft Plan of Management (pp. 102-03) acknowledges that participants seek out and enjoy activities that are associated with higher levels of risk. The CCA supports the general thrust of the statement in the Draft Plan that “...*park managers cannot take responsibility for the safety of participants who engage in high-risk activities*”. The CCA believes that people undertaking any adventure pursuit need to accept personal responsibility for their own safety.

However, the rock climbing community does not share the community and Parks’ perception that rock-climbing or abseiling are high-risk activities. All too often, this perception drives irrational decision making, principally by land managers. This is manifested as precautionary legislation, over regulation and in some cases limitations on access. This is done on the pretext of public safety but in reality is to avoid any risk of litigation.

The Australian/New Zealand Standard 4360 on Risk Management clearly defines terms such as risk and levels of risk. In order to determine levels of risk, either a quantitative or qualitative² approach is required. There is no evidence that either

¹ The first recorded climb in Namadgi National Park was at Booroomba Rocks in Jan 1966.

² A quantitative approach would examine accident data against participation rates.

approach has been adopted by Parks to substantiate the statement on page 102 that “*Certain pursuits, such as rock-climbing, are inherently high-risk activities.*”

A qualitative and quantitative examination of risk reveals that modern rock climbing is of low to moderate risk³ and that many other common everyday activities have higher levels of injury and death such as driving motor vehicles, operating power tools and rock-fishing.

The CCA does not support the contention that rock climbing is high-risk and recommends that the terminology used by Parks to state levels of risk in the Draft Plan of Management should use generic terms without indicating a level of risk. Alternatively, the word high risk should be qualified with the word perceived, namely *perceived high risk*.

Recommendation: Remove any reference to rock climbing and abseiling being an inherently high-risk activity.

Section 8.6 Recreation activities/Rock climbing and abseiling Rock climbing and bolting – strategies 38.68, 38.69 and 38.70

Three of the nine strategies in the Draft Plan relate to bolting or fixed anchor points. The three strategies are not supported by the Canberra Climbers Association (CCA) as they appear to be based on flawed assumptions and a limited understanding of the role of fixed anchor points in climbing.

The use of fixed anchor points in climbing is fundamentally a safety issue for climbers. Climbers prefer to use removable anchors when they climb. Traditionally these consist of wired metal nuts, Spring Loaded Camming Devices and other removable items. The advantage of these over fixed anchors is that they do not mark or damage the rock. However, no cliff line provides adequate natural features to place only temporary anchors. In the past, pitons and other devices have been used as fixed anchors but this destructive technology is now outdated and bolts drilled into the rock face have become the modern standard world-wide.

Bolting is and has been a controversial issue within the climbing community world-wide. There is a strong desire by climbers to maintain the natural and unique nature of the rock within ACT climbing areas. Bolts are never placed in a thoughtless arbitrary manner. When they are, a great deal of ethical discussion takes place within the climbing community before a placement is reluctantly made. The overriding consideration is to balance the challenge of a particular route against the consequences of a fall, particularly in sections of the climb where there are large distances between anchors.

All fixed anchors in Namadgi National Park have been placed by climbers, for climbers. Modern bolting standards include the use of drills and 10mm stainless steel

³ There have been two deaths at Booroomba in 40 years, the first in 1971 and the second in the early 1990s. Twenty-five people have died on Canberra roads so far this year.

expansion bolts. There is no reason why these bolts would fail and should last for up to 40 years. However, no anchor is infallible, whether it be a fixed, or temporary one. All climbers understand that anchors are not foolproof. All climbing guides emphasise the risks in climbing, including anchor failure.

Within the US, Canada, NZ, UK and Australia, there has not been one case where a land manager has been successfully sued in the rare case a fixed anchor has failed. Legal opinion provided to the CCA advises that potential litigation is unlikely to succeed. Accordingly, it is curious why Namadgi NP feels compelled to place signs, warning climbers of the obvious risk – particularly given that these fixed anchors have not been placed by Parks. Climbers find these signs insulting and ugly and Parks would be best advised to spend funds on warning signs that have meaning in other parts of Namadgi.

Strategy 38.70 states *Park managers shall inform rock climbers through signage or other material that management is not responsible for the safety requirements of fixed anchor points; safety is the responsibility of climbers.* The CCA believes that signage is unnecessary, ugly and insulting. Clearly this strategy is to minimise litigation against Parks however legal opinion provided to the CCA advises that the risk of successful litigation is low. The CCA recommended position is as follows:

Recommendation for strategy 38.70: The CCA and ACT Parks acknowledge that all anchors, including fixed anchors, placed on cliffs by climbers are not foolproof. Climbers must exercise caution and care when climbing and assume that anchors may fail; safety is the responsibility of climbers.

Strategy 38.68 states that *No new rock bolting or fixed anchor points will be allowed in the park. Existing fixed anchor points cannot be replaced.* The CCA fundamentally disagrees with the strategy as it an issue of climber safety. Not permitting the replacement of old bolts increases the risk of injury or death from climbing. Given that strategy 38.70 and the section on Visitor Safety on pages 102-3 emphasise that people undertaking risk activities need to take personal responsibility for their safety, paradoxically by banning bolting, climbers are dis-empowered from taking responsibility.

Recommendation for strategy 38.68. Delete.

Strategy 38.69 states that *Existing fixed bolts and anchors may be removed if they are unsightly and diminish the aesthetic values of the rock face or for safety reasons.*

The CCA does not agree that Parks has any role to play in removing bolts on perceived aesthetic or safety grounds for the following reasons:

- There are no definitions for unsightly or aesthetic value. It can be argued that warning signs, roads, lookouts, toilet blocks, mowed grass in camping grounds - indeed any man made structure or intervention within a National Park is not aesthetic. Who is to be the judge of aesthetics?

- Most anchors are almost impossible to see. Tower rocks on the Orroral ridge and Gibraltar Peak are the only climbing areas where a park visitor is likely to spot a bolt.
- Parks may not have the experience or knowledge to determine or assess safety from a rock climbing point of view. Removing a bolt increases risk and reduces safety. Nearly all bolts placed on climbs are marked or recorded in current climbing guides. All climbers consult a climbing guide prior to climbing and make decisions about whether to do that climb and what safety gear to carry. It is possible that a climber may be put into a perilous situation with the removal of an anchor that they expect to be there.
- Strategy 38.69 also contradicts strategy 38.70 in that Parks would prefer (as well as the CCA) that climbers take personal responsibility for their safety.

Accordingly, the CCA makes the following recommendation:

Recommendation for strategy 38.69. Delete.

Rock climbing and abseiling

The section on rock climbing and abseiling at page 113 commences with the following statement:

There is a growing rock climbing and abseiling community in Canberra and Namadgi provides the key focus for their activities. Popular areas include Booroomba Rocks and the Orroral Ridge area. Rock climbing groups, university clubs and commercial operators all use Namadgi for rock climbing and abseiling. Park managers are endeavouring to work with rock climbers to address management issues. In recent years a particular issue has been impacts caused by climbers camping in the Booroomba Rocks area but this has been addressed through the establishment of the nearby Honeysuckle Campground.

CCA comments on the above paragraph:

- We support and encourage park managers to work with rock climbers to address management issues. The CCA provides an avenue for this cooperation.
- The CCA disagrees with the sentence “...In recent years a particular issue has been impacts caused by climbers camping in the Booroomba Rocks area but this has been addressed through the establishment of the nearby Honeysuckle Campground”. Specifically the CCA does not believe that occasional camping, a practice that has been occurring at the Booroomba carpark since the late 1960s causes much impact at all. Indeed comparing photographs from the early 70s to now shows little appreciable difference in impact. Whilst any human activity will cause impact, there needs to be a degree of perspective and balance in this statement. This camping impact is insignificant when compared to the destruction that was caused under Parks management of this area with the removal of trees and placement of boulders following the bushfires. Many of these trees have been stacked into an unsightly pile in the centre of the car park and foreign rhyodacite

boulders (a volcanic rock) were imported into a granite area to act as traffic barriers.

- Climbers do not want to camp at Honeysuckle creek, the designated camping area. Climbers find Honeysuckle creek to be noisy, over-serviced and lacking in aesthetics. The CCA finds it incomprehensible why Parks is resisting the gazetting of Booromba carpark as a semi-primitive campsite⁴. There is a need to service the climber community, particularly interstate climbers, with a campsite that better reflects their desire to be in a natural environment. Interstate climbers camp anywhere from 1-7 nights during their stay and the daily ritual of driving up and down the road between the carpark and Honeysuckle creek burns up fossil fuels and degrades the dirt road. Overall, there are very few campgrounds in Namadgi National Park (schedules 1 and 2) for such a vast land area and it appears to climbers that ACT Parks has lost perspective.

Further, the Draft plan states:

Impacts from rock climbing and abseiling include vegetation trampling, creation of informal walking tracks, clearing of vegetation for camp sites, fire rings, disturbance of cliff-breeding birds (particularly the peregrine falcon), and scarring or altering of rockfaces with removable or fixed bolts. Social impacts include crowding, conflicts with other user groups and safety issues.

CCA disagrees with the impacts mentioned above. Whilst any human activity will have impact the issue is about the degree of impact. The statement above is grossly overstated, inaccurate and also lacks balance and perspective. Specifically

- “...*vegetation trampling*...” Vegetation trampling should not only be attributed to rock climbers, but also to other user groups like walkers, hikers, casual users etc. As such, vegetation trampling ought to be addressed as a subject in itself and not be attributed to one particular user group. Ultimately, human traffic naturally will create trails but the trail impact around climbing areas is minor.
- “...*creation of informal walking tracks*...” Many of these informal walking tracks have been in use for nearly four decades, including the now well established Booroomba Rocks walking track. This track was first established by climbers in the 1960’s and is now widely used by other visitors. The impacts to the environment are minimised by having these established, so called, informal walking tracks, which largely minimise random walking through the bush. The CCA is willing to work with Parks to maintain these tracks, and to minimise the creation of other tracks. These informal tracks serve the same purpose as walking tracks established by walkers and other user groups, allowing climbers to pursue their activities whilst minimising environmental degradation.
- “...*disturbance of cliff-breeding birds*...” There is no evidence to support the statement that climbers or climbing disturb cliff-breeding birds. Climbers and birds have happily co-existed side by side on crags all over the world. CCA

⁴ Climbers have been requesting better facilities at Booroomba since the park was formed in 1984. The pit toilet was only constructed after more visitors, not climbers, started using the climbers walking track to Booroomba Rocks.

supports the protection of wildlife; however, if a situation occurs where cliff birds are breeding, there is no need to close entire rock areas, but only the area affected. This approach works well in Victorian and New South Wales parks where park managers inform climbers of section closures within a climbing area. Usually notices at car parks works well for this purpose and can be reinforced in climbing guides and Club web-sites.

- “*Social impacts including crowding, conflicts with other user group...*”. There is no evidence provided that there has been any crowding or conflicts with other user groups at climbing areas. This sentence also suggests that rock climbing is a lesser-valued activity than other activities like walking. In terms of equity amongst all user groups and the lack of evidence in conflict and crowding, this sentence should be removed.

Recommendation. Amend the paragraph on impacts to reflect balance and perspective of the impacts.

Strategies

38.63 Rock climbing and abseiling are allowed throughout all zones of the park.

Recommendation for strategy 38.63. CCA agrees and supports the strategy.

38.64 Park managers may close rock-climbing areas where impacts reach unacceptable levels.

No definition of impact levels or what is acceptable and unacceptable or what is being impacted has been presented. This statement is vague, subjective and biased against climbers.

Recommendation for strategy 38.64: Park managers will work with rock climbing groups and individuals to minimise the environmental impacts in climbing areas.

38.65 Climbing areas may be temporarily closed where peregrine falcons are breeding.

The CCA supports the protection of wildlife; however, there is no need to close entire climbing areas, but rather sections of areas. This works well in Victorian and New South Wales parks where park managers communicate with climbers on nesting sites and closure of particular rock climbing routes. Climbers already respect such targeted temporary closures, for example, at Red Rocks near Kambah.

Recommendation for strategy 38.65. Sections of climbing areas or particular routes may be temporarily closed where peregrine falcons are breeding. Climbers will be consulted when park managers consider such action.

38.66 Park managers may temporarily or permanently close climbing areas if climbing and abseiling activities pose risks to rare or threatened species or important cultural sites.

No definitions of risk to rare or threatened species or important cultural sites have been provided. Environment ACT would know where these sites are currently, and these should be presented in a transparent manner in this draft proposal, for comment.

Recommendation for strategy 38.66. Insert after the first sentence in the existing strategy “*park managers will consult with climbers where such action is being contemplated*”

38.67 Small group sizes will be encouraged to reduce impacts. Group size may be enforced through a permit system if necessary.

This is unnecessary, as anecdotal evidence suggest that climbing groups using the Namadgi National Park are fewer than other groups such as walkers and casual visitors. It should be noted that the existing ACT Granite climbing guidebook encourages climbers to keep group sizes small.

Recommendation for strategy 38.67. Delete second sentence.

38.71 A partnership approach will be developed with rock climbing groups to promote a code of practice for rock climbers aimed at low impact use of the park and participation in maintenance and management of rock climbing areas.

The CCA fully supports this strategy and would be willing to cooperate with Parks towards this outcome.

Recommendation for strategy 38.71. Agreed.