

Submission on rock-climbing and the Greater Gariwerd Landscape Draft Management Plan (DMP)

January 2021

This submission has been prepared by Mike Rockell. I am 61 years old and a lifelong, highly committed and experienced climber. I have climbed extensively in Australia, New Zealand, America, Europe and Asia. I have seen the development and changes of climbing across the decades and I have also seen the impacts of climbing in these different locations along with good and poor management of different climbing locations. I have prepared this submission with the grateful support, encouragement and guidance of climbing friends and colleagues.

I hope you will take the time to consider this submission and I would be pleased to discuss it in person and/or participate in further development of plans for the park, and related to climbing in particular.

Preparing a well-researched and properly considered submission is demanding and time-consuming. Not all people have the time or capability to do this. For this reason, I have made my submission publicly available to others in the Victorian climbing community so that if they wish, they can choose to support it. The following individuals have indicated their support for this document. So rather than considering that this is a submission by just one individual it should be weighted to take into account the number of people listed on the next page.

Supporters of this Submission:

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We love Gariwerd. Its combination of wild beauty and world class climbing is unique. We hope to be able to continue to climb here, and to work with others so the quality of the climbing experience is enhanced without significant impact on the foundational environmental and cultural values of the landscape. We look forward to seeing many of the recommendations and suggestions put forward in this submission being adopted in the Final Plan.

Summary

The Draft Management Plan (DMP) for Gariwerd is a paradigm change in how this National Park will be managed and this includes the management of rock climbing. The fact that it has been prepared in partnership with the three Traditional Owner Groups for Gariwerd and has a strong focus on protecting cultural heritage and seeing Gariwerd as a living, cultural landscape is fully supported.

1. **Absolute Support for the Primacy of Cultural and Environmental Values.** We love climbing in Gariwerd and want to keep doing so: but not to the detriment of cultural and environmental values. We are sorry that some climbing activities appear to have impacted those values and want to avoid that happening again. With good, sensible management and the support of the climbing community this is achievable.
2. **Allowance for Rock Climbing to Continue.** The DMP shows promise for allowing rock climbing to continue in Gariwerd, but in its current form is excessively restrictive on where it can occur. This submission advocates that priority be given to access to a further 36 locations in addition to those already permitted. This is a focus on quality, popularity and range of climbing experiences rather than quantity of climbing locations. This would rejuvenate climbing in Victoria. This can be done in a way which does not have any significant impact on cultural or environmental values.
3. **Good Management of Climbing.** The number of climbers is increasing with population and more climbing gyms. We must work together to establish new approaches and norms to minimise impact. We feel it is critical that this is done rationally with close consultation between all concerned. This is covered in detail in this submission. Some brief examples: bolts can be replaced or reconfigured to make them effectively invisible and climbs with well executed bolt anchors minimise impacts through avoiding activity in sensitive gulleys. Steps, stone platforms and the like in very popular areas can minimise erosion. Chalk use can be managed and cleaning organised to eliminate visual impacts.
4. **Long term active management is needed.** No initial plan will be perfect. Also, as climbers come to understand the plans, and land managers come to understand climbing, many improvements and changes will be possible. We fully support and advocate for an approach that has an active group of climbers working cooperatively with land managers and other parties into the future.

Good management coupled with ongoing liaison with the climbing community will allow climbing to continue whilst respecting and protecting cultural and environmental values.

This submission includes 14 Recommendations along with many other suggestions for improvements.

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Recognition of Traditional Owners and the Gariwerd Landscape

The Traditional Owners' Forward and Chapter 3 of the DMP, *Gariwerd- a living cultural landscape* are powerful and deeply moving sections of the Draft Plan.

We would recommend that all people intending to climb in this Landscape read and reflect on the contents of these sections.

It is fully recognised and supported that Traditional Owners and the three Registered Aboriginal Parties (RAP Groups); the Gunditj Mirring Traditional Owners Aboriginal Corporation, the Eastern Maar Aboriginal Corporation and the Barengi Gadjin Land Council Aboriginal Corporation have extensive and enduring connections to Gariwerd and that they are partners in the ongoing management of Gariwerd.

It is understood that Aboriginal People continue to use and appreciate their links to Gariwerd and that over time the nature of their relationship and use of Gariwerd has changed. Examples of the change in use and interaction with Gariwerd includes, it was once a major source of food and shelter for Aboriginal people at various times of the year. The vast amounts of quartzite and sandstone rock within the park were in the past were utilised for sheltered campsites, as a canvas for their art and as a source or quarry for the raw material to make the culturally essential stone tools and grindstones, that are at the core of our current understanding of the extent and diversity of Aboriginal occupation within Gariwerd specifically and Australia more broadly. Evidence suggests that quantities of the quartzite that was quarried from within Gariwerd were traded by the Traditional Owners to Aboriginal groups that didn't have access to the highly valued resource.

It is hoped that ways can be found for climbing to continue in Gariwerd and that respectful relationships can be developed so that the Landscape is respected and nurtured thus providing an enhanced and culturally enriched experience for climbers and others who are passionate users of some of these same areas in the present day. With good and appropriate management of the resources within Gariwerd, climbers and others can gain increased appreciation and respect for the different resources utilised in the past and the role that Gariwerd plays as a repository of information.

The intent of this submission is to always be respectful of the Traditional Owners and the places of significance to them. Apologies in advance, if there are cultural nuances that are misunderstood or overlooked; these omissions/faux pas are through lack of awareness rather than intent.

It is hoped that progress can be made such that once the Draft Management Plan is finalised and approved, and the permit system for climbing is implemented that there could be a celebration, possibly a 'Welcome to Country ceremony' for the climbing community that can enhance the understanding, awareness and responsibilities of climbers as guests to Gariwerd.

Page 87 of the DMP:

The Traditional Welcome to Country

A Welcome to Country, has always been the right and responsibility of Traditional Owners in protecting Country and all people visiting it.

The welcome is a symbolic, diplomatic and spiritual demonstration of reciprocal obligations. It is a permission — a cultural and spiritual visa- which comes with responsibilities for both the host nation and their guests being inducted onto the land.

It is the host's responsibility to ensure the physical and spiritual wellbeing of visitors, which includes ensuring they understand the dangers on Country and how not to harm country. Smoking ceremonies are always part of a welcome to Country, to cleanse the spirit of visitors and provide spiritual protection and so Country recognises them.

It is the responsibility of guests to respect Country and not abuse their privilege.

In keeping with the DMP signal to use Traditional Owner names where possible, the Grampians is referred to throughout this document as Gariwerd.

Introduction to the Details of this Submission

This submission is focused on the climbing related aspects of the DMP.

Specific focus is given to the sections:

- Rock climbing and bouldering section -pages 101-107
- Appendix 2 Designated Climbing Areas pages 152-160
- Maps 4A-4K

Other supporting documents have been provided by Parks Victoria. Occasional reference is made to these.

Overarching Points:

Climbing is Accepted and Supported in the DMP

From page 101:

Grampians (Gariwerd) National Park is nationally and internationally recognised for its world-class rock climbing. Parks Victoria and Traditional Owners recognise the physical, social and economic benefits of rock climbing, supporting Parks Victoria's Healthy Parks Healthy People approach of fostering healthy and active communities. A diverse and extensive range of climbing opportunities will therefore continue to be supported.

Response: This is fantastic and is applauded.

But the challenge now is to put these intentions into practise. The current list of Designated Climbing Areas in Appendix 2 of the DMP is lacking in bouldering and sport climbing opportunities **does not currently meet** the commitment to a “diverse and extensive range of climbing opportunities”.

By considering additional Climbing Areas this can be rectified. This is covered in some detail later in this submission. See *page 10, Proposed Rock Climbing Areas*

Climbing Needs to Be Better Managed

From Page 101:

To date, climbing has been relatively unregulated. The substantial growth in popularity has, however, led to challenges for management including harm to the environment and to Aboriginal cultural heritage.

Response: This is acknowledged, and it is accepted that climbing will need to be better managed in the future in order to minimise environmental impacts and avoid the possibility of harm to cultural values and impact on both tangible and intangible cultural material. The framework being developed within the DMP will assist with this, but the following recommendations are also provided.

Recommendation 1: That a formalised ongoing consultation arrangement is put in place with representative climbing groups and organisations. The purpose of which would be to allow feedback and resolution of arising issues before they reach crisis points and to ensure continued good and practical management of climbing over the life of this

management plan -which could be 15 years or more. Consultation could include two formal meetings a year and an annual review/report on climbing usage and impacts in Gariwerd.

Recommendation 2: That Parks Victoria engage with 'Cliffcare' and Crag Stewards Victoria to carry out at a grass roots level, activities that assist in minimising the impact of climbing on the environment. Such activities can range from projects to stabilise access tracks and the bases of crags and boulders, to rubbish removal and climber education.

Implementing these recommendations can be a win-win for Parks Victoria as it will lead to better engagement, develop a sense of partnership and collaboration and compliance with the climbing community. It is also a way that additional resources for maintenance works can be leveraged through volunteer work and fund raising done by climbers.

Observed Impacts

From page 102:

- values. Observed impacts included:
- deliberate scratching and painting with charcoal, typically on the cliff face at the bases of climbs
 - chalk on rock faces, which can be difficult to remove and can stain the surface of the cliff face (commonly associated with bouldering and sport climbing)
 - installation of bolts, or fixed protection, in rock faces
 - damage to vegetation, soil compaction and erosion caused by pedestrian traffic, particularly access routes to the top and base of the cliffs that do not have suitable infrastructure and around belay points and congregation areas at the base of cliffs.

Some corrections are required here.

1. It is most unlikely that climbers would deliberately scratch or paint with charcoal at the base of climbs. There is no reason for climbers to do this and charcoal markings could well have been done by non-climbers.
2. Chalk can be difficult to remove from the rock as it penetrates into the pores of the rock, but to say it is staining the rock is somewhat misleading. It can be partially removed by brushing with soft brushes. It can be fully removed by dissolving with vinegar then wiping away and rinsing with water and drying with clothes. Chalk is used for trad climbing, not just bouldering or sport climbing. The difference is that it is more common for the latter to take place on steep rock where the rock is not washed clean by rain. Trad climbing often takes place on routes that are less steep and so chalk is naturally washed away. Chalk is covered in more detail later in this submission *Bullet Pt 3. Chalk page 25*.
3. Fixed anchors, typically bolts, are an observable impact, especially those placed close to the ground. Bolts that are higher up are generally very difficult to spot. Bolts can also be painted to blend in with the cliff. The visual impact of bolts can be made very low. Aside from this aesthetic aspect, it is hard to see any other environmental impact caused by bolts. There is the risk of bolting in a location where there are Cultural Values. This clearly should be avoided. This risk can and is being mitigated by the survey work being carried out to identify cultural heritage. Fixed anchors are

covered in more detail later in this submission. See *Management of Fixed Protection* page 27

4. Damage to vegetation, soil compaction and erosion. Agree that this is an issue to be better managed, especially at popular climbing locations *via Recommendation 2*. Without future good management this could be an increasing issue with the number of approved climbing locations likely to be reduced and the potential for climbing numbers to increase steadily over time.

Recommendation 3. Make Corrections to The Observed Impacts of Climbing.

Proposed Rock Climbing Areas

The DMP covers these on pages 102-106 and Appendix 2. Proposed rock climbing areas form the heart of the rock climbing component of the DMP. Likewise, it forms the heart of this submission.

The specific management strategy is from page 106:

Strategies	Priority Level
Allow climbing in the Designated Climbing Areas only (refer to Appendix 2 and Maps 4A-H).	Immediate
Areas yet to be assessed which may be deemed as appropriate, may become additional Designated Climbing Areas in the future.	
No new potential climbing areas will be designated following the publication of the final Management Plan. Climbers are invited, however, to nominate areas with demonstrated existing use (i.e. published information) that are not currently noted (in Appendix 2 and Maps 4A-H) for consideration for the final Management Plan.	
Rock climbing is to be prohibited in any identified exclusion zone within Designated Climbing Areas. This may include significant rock shelters and sites of tangible Aboriginal cultural heritage.	

The response is as follows:

Priority Climbing Locations in the Gariwerd Landscape

Introduction

It is welcomed that blanket bans of climbing in large swathes of Gariwerd via the SPA mechanism will no longer apply and that there is a more nuanced location by location consideration. This submission accepts that climbing will be constrained to approved locations but expects; that approval is only withheld when there are sound and justifiable reasons for doing so.

Cultural Values (CV) and Climbing We respect the imperative to protect Cultural Values (CV) but hope that access solutions to a number of selected locations including Taipan/Spurt, Bundaleer South and Hollow Mountain Cave can be found through respectful consultation with the Traditional Owner groups. Such an approach will help build respect and understanding and a shared love of this landscape.

Natural Values (NV) and Climbing. Climbing, like other recreational activities will, in an absolute sense, have some level of observable impact on the natural environment. But in a

relative and holistic perspective, given the very small footprint of the proposed climbing locations there would be **negligible overall impact** on flora and fauna. Any impact can be further minimised by working with climbing organisations including Cliffcare and Crag Stewards Victoria to implement solutions as per Recommendation 2. These solutions can include:

- Track marking and stabilisation of tracks
- Containment and stabilisation at the bases of crags and boulders
- Removal of permanent excess chalk from any locations with high visibility to the public
- Special measures such as seasonal closures for the benefit of wildlife

Climbing Locations and Categorisation in the Draft Management Plan

The Draft Management Plan lists 281 climbing locations in the Gariwerd Landscape and has drawn heavily from information on theCrag. The areas listed in the Draft Management Plan cover around ¾ of 8700 plus routes and boulder problems listed on theCrag for Gariwerd.

TheCrag indicates 72 % of the routes are trad, 15% bouldering, 9% sport and 1% aid and indicates a broad range of grades. TheCrag also indicates 64,000 ascents within Gariwerd.

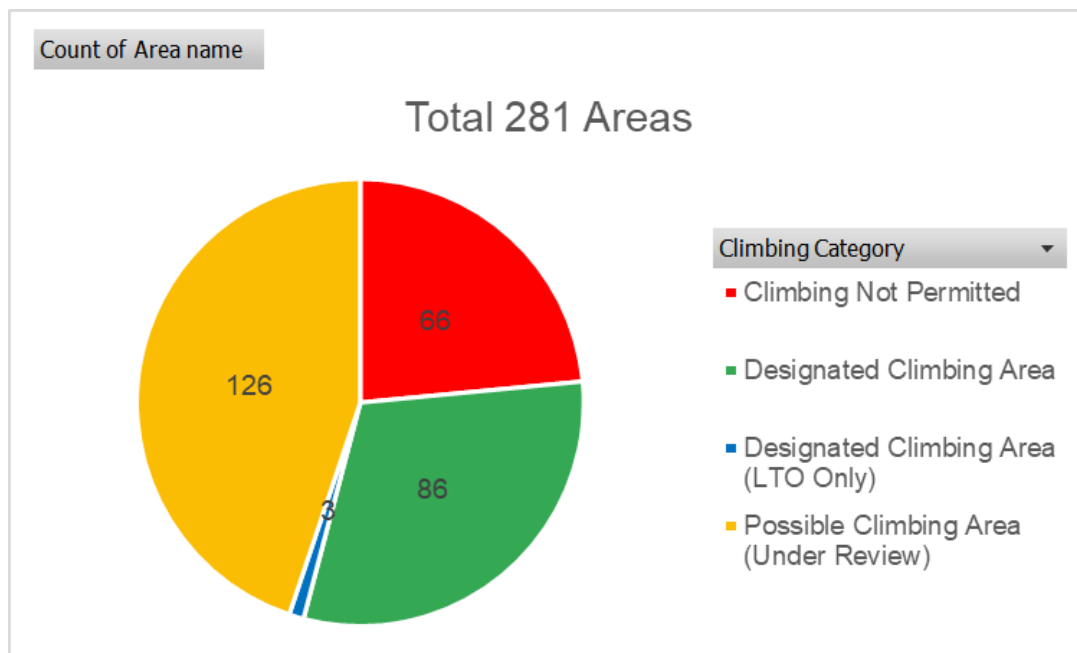
Sidenote: Using information from theCrag.
<https://www.thecrag.com/en/home>

This website provides substantial information on climbing locations around the world but especially for Australia. The Draft Management and this submission draws heavily from it.

This submission uses the number of **Ascents recorded** on theCrag as a way of gauging the **relative** popularity of different climbing locations even though this site will not be capturing anything like all the ascents made.

This has been used to guide the prioritisation of climbing locations along with other factors such as number of climbs at a location and style of climbing.

The Draft Management Plan splits these 281 locations into 4 categories:



Designated Climbing Areas (Green Locations)

The Draft Management Plan lists 88 designated climbing areas. From analysing data on theCrag the following key points are noted:

These areas contain:

- 1887 in total, or < ¼ of the listed climbs in Gariwerd
 - 1543 trad climbs
 - 252 sport climbs
 - 81 boulder problems
 - 11 unknowns
- Account for only 16,000 of the 64,000 listed ascents on theCrag.
- They do contain some good lower to mid-grade sport climbing, but there are virtually no climbs of the hardest grades
- Sport climbing, and hard sport climbing is very limited.
- Bouldering is extremely limited. Just one bouldering location is listed and that is Mountain Lion which is not a highly rated bouldering area. Indeed, it could be an oversight and that they will only allow the trad climbing at this location.
- These top 15 most popular locations account for 86% of the ascents for Green list locations.
- The remaining 71 locations consist of a lot of minor crags with few routes or ascents listed on theCrag.

The top 15 locations in the Green category are:

Area name	Total # Routes	Ascents	Ascent Ranking	Predominant Style
Tribute Wall	24	2309	6	Sport
West Flank	31	2165	7	Sport
The Ravine	21	1674	10	Sport
Bundaleer Nth (RNA)	100	1242	17	Trad
Van Diemen's Land	42	1204	20	Sport
The Watchtower	63	1152	21	Trad
Sentinel Cave	15	890	27	Sport
Main Cliff (RNA)	85	778	28	Trad
Mountain Lion (RNA)	117	417	38	Bouldering & Trad
Ruined Castle (RNA)	36	416	39	Sport
Grey and Green Walls	36	408	40	Trad
Bad Moon Rising Wall	22	388	41	Trad
Curiosity Crag	39	315	45	Sport
Central Buttress	30	309	46	Trad
The Wall of China	77	224	48	Trad

- Only 5 of these locations rate in the top 20 of Ascent Rankings for Gariwerd.

This very limited number of popular areas will be under a lot of pressure. This pressure will also flow to Mount Arapiles.

Sport climbing and especially hard sport climbs is currently terribly limited. Hard sport climbs, whilst they might only be done by a small proportion of climbers, provide substantial inspiration and motivation for many climbers and often form the basis of long-term goals. The elimination of hard sport climbing in Gariwerd would be a tragic loss.

Bouldering has been eliminated unless significant further areas are opened as soon as possible. This would be a tragic loss for the sport in Victoria. Bouldering has grown significantly in popularity in recent years, and it is acknowledged that this has had impacts around the base of bouldering areas. But at the same time the total land area impacted is minimal and actions can be taken to better manage and minimise this impact. Bouldering can be a great way for people to be introduced to the outdoors and thereby exposed to and supporting the values associated with caring for the Gariwerd Landscape.

Recommendation 4. The Finalised Management Plan should prioritise the urgent assessment and (re)opening of many more locations, especially for bouldering and sport climbing which have become very popular aspects of the sport, yet are severely limited in the Draft Management Plan.

Priority Locations for Reopening

A prioritisation method has been used to identify the most popular and important locations for reopening.

- Priority 1. Highly important and popular
- Priority 2. Popular (>100 ascents listed on theCrag.)
- Priority 3. Additional bouldering locations
- Priority 4. Those listed in Draft Management Plan as Possible locations, with more than 15 routes, but <100 ascents listed on theCrag.
- Priority 5. Those listed in Draft Management Plan as Possible locations, but contain less than 15 routes

Note: This method of prioritisation leans heavily on using the number of ascents listed on theCrag as a means of gauging the relative popularity of different climbing locations.

Priority 1-3 Locations (See Table below)

This list shows 36 locations which contain nearly 1700 climbs, including key Sport and Bouldering locations.

It is recommended that these locations be evaluated or reconsidered within the next 6-12 months. **The reopening of just these additional 36 locations would be a major turning point for the rejuvenation of climbing in Gariwerd and Victoria.**

The list does include the 3 Blue locations and 7 Red locations where reconsideration of their current classifications is requested. The details for these to be reconsidered are discussed in more detail further on in this section.

Count	Priority	Priority Comment	Area name	Comments	Total # Routes	Ascents	Ascent Ranking	Predominant Style
1	1	World Reknown Cliff	Taipan Wall		97	1717	9	Trad
2	1	Combines as part of Taipan	Spurt Wall		29	1554	13	Sport
3	1	Key bouldering area	Andersens West		179	2794	2	Bouldering
4	1	Review	Back Wall (LTO Only)	Review Decision	41	2594	3	Trad

5	1	Priority Review - Intl acclaim	Muline Crag	Review Decision	43	599	32	Sport
6	1	Priority Review - Intl acclaim	Hollow Mountain Cave	Review Decision	47	548	34	Bouldering
7	1	popular>100 ascents	Eureka Wall		23	205	51	Trad
8	2	popular>100 ascents	Golton Rocks	Cave, Wave & Sungate	37	2392	4	Sport
9	2	popular>100 ascents	Trackside boulders	Review Decision	81	2341	5	Bouldering
10	2	popular>100 ascents	Black Ian's Rocks		137	1745	8	Trad
11	2	popular>100 ascents	Red Rock Pinnacles		75	1284	14	Sport
12	2	popular>100 ascents	Venus Baths		62	1261	15	Bouldering
13	2	popular>100 ascents	Dreamtime Wall		120	1244	16	Sport
14	2	Reconsider Touchstone Pictures	Bundaleer Sth (RNA)	Review Decision	65	1242	18	Trad
15	2	popular>100 ascents	Weirs Creek		35	1063	22	Sport
16	2	popular>100 ascents	The Kindergarten (bouldering)		40	993	24	Bouldering
17	2	Review - popular bouldering	Loopeys	Review Decision	43	950	25	Bouldering
18	2	Review - popular bouldering	Sundial Peak (primarily The Bleachers)	Review Decision	79	915	26	Bouldering
19	2	popular>100 ascents	Cut Lunch Walls		25	605	31	Sport
20	2	popular>100 ascents	Epsilon Wall Bouldering		16	539	35	Bouldering
21	2	popular>100 ascents	Clean Cut Walls		28	512	36	Sport
22	2	popular>100 ascents	Centurion Walls		34	361	42	Trad
23	2	popular>100 ascents	Millennium Caves – Closed	Closed - Focus Area	33	351	43	Trad
24	2	Review - popular bouldering	Valley of the Giants	Review Decision	50	336	44	Bouldering
25	2	popular>100 ascents	Little Joe Hill		54	200	52	Trad
26	2	popular>100 ascents	Citadel		26	198	53	Bouldering
27	2	popular>100 ascents	Spanish Galleon		10	170	57	Sport

28	2	popular>10 0 ascents	Titanic Boulder		22	150	59	Bouldering
29	2	popular>10 0 ascents	Cave of Man Hands – Closed	Closed - Focus Area	16	136	62	Bouldering
30	2	popular>10 0 ascents	Between the Sheeps		19	104	69	Bouldering
31	2	Review	Wall of Fools Sth (LTO Only)	Review Decision	11	613	30	Trad
32	2	Review	Barc Cliff (LTO Only)	Review Decision	12	122	65	Trad
33	3	<100 ascents, bouldering	Echidna Wall (bouldering)		17	56	90	Bouldering
34	3	<100 ascents, bouldering	Ground Control Caves		16	54	92	Bouldering
35	3	<100 ascents, bouldering	Legoland		30	25	118	Bouldering
36	3	<100 ascents, bouldering	Breakfast Room Buttresses		24	0	191	Bouldering

Working with climbing organisations to ensure that good measures are implemented for the care and maintenance of these locations along with the access to them, would be a great way of (re)building the relationship between Parks Victoria, Traditional Owners and the Climbing Community.

For completeness here is the list of Priority 4 and 5 locations:

Priority 4 list: 28 locations, 858 routes, mainly trad.

Count	Priority	Priority Comment	Area name	Total # Routes	Ascents	Ascent Ranking
37	4	>15 routes, <100 ascents	Mt Ida	40	94	72
38	4	>15 routes, <100 ascents	Pastoral Buttress	16	94	73
39	4	>15 routes, <100 ascents	Barbican Wall	43	77	80
40	4	>15 routes, <100 ascents	The First Dial	36	74	82
41	4	>15 routes, <100 ascents	Punter's Pinnacle	20	73	83
42	4	>15 routes, <100 ascents	Burrunj North	53	70	85
43	4	>15 routes, <100 ascents	Gondwanaland – Closed	19	51	97
44	4	>15 routes, <100 ascents	Wildebeest	47	47	99
45	4	>15 routes, <100 ascents	The Cheesecake	29	34	108

46	4	>15 routes, <100 ascents	Blazed Rock	25	31	110
47	4	>15 routes, <100 ascents	Eldorado	49	27	114
48	4	>15 routes, <100 ascents	Crocodile Rock	15	23	121
49	4	>15 routes, <100 ascents	Bordel Buttress	25	21	123
50	4	>15 routes, <100 ascents	Liomin Castle	39	21	124
51	4	>15 routes, <100 ascents	Paddys Castle	19	19	126
52	4	>15 routes, <100 ascents	Mount of Olives	20	18	128
53	4	>15 routes, <100 ascents	The Flatiron	47	13	138
54	4	>15 routes, <100 ascents	Black Sheba's Buttress	20	11	142
55	4	>15 routes, <100 ascents	Gallery Creek	41	11	143
56	4	>15 routes, <100 ascents	The Terraces	17	10	145
57	4	>15 routes, <100 ascents	The Unnamed Cliff	32	10	146
58	4	>15 routes, <100 ascents	Barbican Rocks	49	9	148
59	4	>15 routes, <100 ascents	Burrunj South	22	9	149
60	4	>15 routes, <100 ascents	Solar Ridge	22	9	151
61	4	>15 routes, <100 ascents	Black Range Road Outcrop	19	7	157
62	4	>15 routes, <100 ascents	Jungle Gym	19	6	162
63	4	>15 routes, <100 ascents	Eagles Head	59	5	166
64	4	>15 routes, <100 ascents	No Mans Land	16	0	200

Priority 5 list: 72 locations.

Count	Priority	Priority Comment	Area name
65	5	Private land -closed	Campground Boulders
66	5	<15 routes	Beehive Falls
67	5	<15 routes	Drama Wall
68	5	<15 routes	Heatherlie Heights
69	5	<15 routes	Mirage Wall
70	5	<15 routes	Pacific Ocean Wall
71	5	<15 routes	Point 447
72	5	<15 routes	Split Pinnacle
73	5	<15 routes	Unnamed cliff
74	5	<15 routes	Watchmen Wall
75	5	<15 routes	Mount Zero West Walls

76	5	<15 routes	Mt Zero roadside Crag
77	5	<15 routes	Mt Zero Summit Cliff
78	5	<15 routes	Pangaea Walls
79	5	<15 routes	Wildsides
80	5	<15 routes	Currajong Rocks
81	5	<15 routes	Gang-Gang Rocks
82	5	<15 routes	Goat Crag
83	5	<15 routes	Hardenbergia Rocks
84	5	<15 routes	Lake Wartook Lookout Area
85	5	<15 routes	Lichen Land
86	5	<15 routes	Mirage Rock
87	5	<15 routes	Blind Mans Bluff
88	5	<15 routes	Cirque Creek
89	5	<15 routes	Backside Bouldering
90	5	<15 routes	Base Camp Buttress
91	5	<15 routes	Black Wall
92	5	<15 routes	Boronia Peak
93	5	<15 routes	Boulder Rock
94	5	<15 routes	Budja Budja
95	5	<15 routes	Diving-Board Rocks
96	5	<15 routes	Eclipse Buttress
97	5	<15 routes	Infinity Wall
98	5	<15 routes	Labour Ward
99	5	<15 routes	Musbury Crags
100	5	<15 routes	Peverill Pillar
101	5	<15 routes	Rural Rocks
102	5	<15 routes	Samba Rocks
103	5	<15 routes	Suburbia
104	5	<15 routes	Superbia
105	5	<15 routes	The Garrets
106	5	<15 routes	The Peanut Gallery
107	5	<15 routes	The Pinnacles
108	5	<15 routes	The Radiator
109	5	<15 routes	Tombstone Rock
110	5	<15 routes	Town Slab
111	5	<15 routes	Wonderland Carpark Access
112	5	<15 routes	Conifer Wall
113	5	<15 routes	Porcelain Wall
114	5	<15 routes	Eagle Rock
115	5	<15 routes	Eureka Towers
116	5	<15 routes	Little Hands Cave – Closed
117	5	<15 routes	Queensland Cliff
118	5	<15 routes	Burnt Shirt Buttress
119	5	<15 routes	Castle Rock
120	5	<15 routes	Davy Jones Locker
121	5	<15 routes	Green Gap Pinnacle

122	5	<15 routes	Seclusion Wall
123	5	<15 routes	The Back of Beyond
124	5	<15 routes	The Mt William Road Cliff
125	5	<15 routes	Pump Wall (Campbell's Rock)
126	5	<15 routes	Wedge Tail Boulders
127	5	<15 routes	Bernard's Boulders
128	5	<15 routes	Northern Cliff
129	5	<15 routes	The Piccaninny
130	5	<15 routes	Trackside boulders (Mt Abrupt)
131	5	<15 routes	Black Blocks
132	5	<15 routes	Hut Point
133	5	<15 routes	Monkey Buttress
134	5	<15 routes	Mouse Rock
135	5	<15 routes	Ross Walls
136	5	<15 routes	Thryptomene Wall

A more detailed evaluation of the locations within the 3 not permitted classifications of the Draft Management Plan now follows:

Designated Climbing Areas (LTO Only) (Blue locations) for Reconsideration

Area name	Total # Routes	Ascents	Ascent Ranking	Predominant Style
Back Wall (LTO Only)	41	2594	3	Trad
Wall of Fools Sth (LTO Only)	11	613	30	Trad
Barc Cliff (LTO Only)	12	122	65	Trad

These three locations are all in the Summerday Valley area.

The Draft Management Plan indicates on Page 104 that the Blue locations are “3 areas have been determined and include less than 50 climbing routes”. In-fact the Back Wall was immensely popular with the 3rd highest Ascent Ranking of any location in Gariwerd. This location has many entry level climbs and is easily accessible with high quality track access already in place.

Recommendation 5. Given that a permit system, which will include a cultural induction component is being introduced for all climbers, we recommend that these LTO only locations become a designated climbing area open to all once the permit system is in place. The first priority is the Back Wall.

Climbing Not Permitted (Red Locations) for Reconsideration

There are 66 red locations, containing 1620 climbs and boulder problems, with over 15,000 ascents recorded on theCrag. These include a substantial number of high value sport climbing, trad climbing and bouldering locations.

The table below shows the 15 most popular locations, based on ascents listed on theCrag.

Area name	Comments	Total # Routes	Ascents	Ascent Rank	Predominant Style
Muline Crag	Review Decision	43	599	32	Sport
Hollow Mountain Cave	Review Decision	47	548	34	Bouldering
Trackside boulders	Review Decision	81	2341	5	Bouldering
Bundaleer Sth (RNA)	Review Decision	65	1242	18	Trad
Loopeys	Review Decision	43	950	25	Bouldering
Sundial Peak (primarily The Bleachers)	Review Decision	79	915	26	Bouldering
Valley of the Giants	Review Decision	50	336	44	Bouldering
Andersens East		111	2831	1	Bouldering
The Gallery – Closed		31	1622	11	Sport
Amnesty Wall Area		42	1555	12	Sport
Main Wall		32	1010	23	Trad
Wall of Fools Nth		24	613	29	Trad
The Tower		34	579	33	Sport
The Snake Pit		18	452	37	Bouldering
Red Wall Area incl Echoes Block		51	301	47	Bouldering &Trad

Climbing Locations for Reconsideration

Of the 66 “Climbing Not Permitted” locations, this submission is requesting that this decision be reconsidered for just 7 of them for the following reasons:

i. Trackside Boulders

Our evaluation of Trackside Boulders is that it does not fall within either a Cultural Value (CV) or a Natural Value (NV) zone. Therefore, it does not fit the decision-making framework (Appendix 2, page 152 of the Draft Management Plan). It does however sit right next to The Peaks Trail. This is not a sufficient reason to close this location. Should remedial work be required to prevent erosion around the base and to remove excess chalk then this is a separate issue and one that can be addressed with climbing organisations as part of future good management of climbing and bouldering locations.

ii. Bundaleer South

In August 2020, the area south of and including the climb “Sparrows” was temporarily closed as a precautionary measure to protect cultural heritage values whilst more detailed evaluations were carried out. It now appears to be permanently closed without further consideration of a more finely detailed approach. This has prevented access to several very high-quality climbs including a number of historical value to the climbing community. It is respectfully asked whether access to some of this cliff line could be made possible, without impinging on locations containing cultural values. Involving a group such as the Gariwerd Wimmera Reconciliation Network (GWRN) to work with Traditional Owners to review what possibilities may exist for reopening some of these climbs.

iii. Loopeys and Hollow Mountain Cave

These are 2 significant bouldering locations. Hollow Mountain Cave contains internationally renown boulder problems. Both locations are on Hollow Mountain and are very close to the walking trail that leads to the top of Hollow Mountain. It is not clear why these two locations are closed, especially as tourists and walkers are permitted, and the base of these climbs are hard rock and so there is not an erosion issue or any clear environmental concerns. It is therefore requested that the reopening of these locations is considered, even if that does require some form of special restrictions being applied.

iv. The Bleachers and Valley of the Giants

These are two bouldering locations near Hall's Gap. An overlay of their locations with

The Draft Management Plan Map 2, Proposed Management Zones and Overlays indicates that they both fall within NV11.

From page 163 of the Draft Management Plan the following information is available:

Key Values	Purpose/Objective	Specific management arrangements
Special Protection Area NV11 Dalton Peak		
Long-nosed Potoroo, Southern Brown Bandicoot and Smoky Mouse habitat	Minimise human disturbance to habitat of these EPBC listed species and reduction of vegetation cover in potential habitat, including protecting ground cover from damage and inappropriate fire regimes.	Standard restrictions on recreation activities apply (see Section 5.3). Where appropriate exclude fire from unburnt refugia.

It is suggested that the bouldering could continue at these two locations without putting these natural values at risk given the very small footprint of the bouldering compared to the size of NV11. If further protective measures were required, for example seasonal closures, then they should be considered ahead of a blunt and permanent closure.

v. Muline Crag

This is one of the very best crags in Gariwerd and contains a concentration of some of the best harder graded climbs in Australia that ascend unique and beautiful features.

It is in NV9. This information is from page 162 of the Draft Management Plan:

Key Values	Purpose/Objective	Specific management arrangements
Special Protection Area NV9 Billawin North		
Brush-tailed Rock-wallaby habitat	Avoid human disturbance in rocky habitat occupied by Brush-tailed Rock-wallaby (EPBC listed) and high quality potential habitat identified as suitable for future release sites.	Only passive recreation activities, such as walking and wildlife observation are permitted.

Muline Crag occupies a very small footprint and the number of climbers that visit it is limited owing to the difficulty of the climbs. It should be quite possible for climbing to continue here without putting the Natural Values of this location at risk.

Recommendation 6: That 7 areas, Trackside Boulders, Bundaleer South, Loopeys, Hollow Mountain Cave, The Bleachers, Valley of the Giants and Muline Crag areas be subjected to a more detailed reconsideration for becoming Permitted Climbing Locations.

Possible Climbing Areas (Under Review) (Orange Locations)

The Draft Management Plan states that “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.” – page 103.

But it is most concerning that it also states, “will continue to seek funding to undertake the outstanding assessments as soon as possible.”- page 2 GGLDM Rock climbing, Abseiling and Bouldering Overview. We would like to have assurances that the funding will not be an issue.

Recommendation 7: If funding is not available for the proper evaluation of Undecided locations, then they should be left as Open until such time as funding does become available. In this interim period it is recommended that the Land Manager enters into discussions with Cliffcare and Crag Stewards Victoria to ensure the best possible management and care is taken of these areas until funding is obtained.

Recommendation 8: For those locations Under Review, follow the prioritisation Schedule given in the Tables earlier in this Section

Improvement in the Decision Process For Climbing Areas

Appendix 2 page 152 of the Draft Management Plan contains a diagram showing a decision process for climbing areas. It is good to see that there is an intention to apply a rational process to this, but the diagram needs some clearer more explicit explanations and the Decision Diamond at the bottom right hand of the diagram lacks meaning.

Recommendation 9: Give greater clarity to this diagram on page 152 and the decision-making criteria being applied.

Bouldering Management Strategies

From page 106:

Allow bouldering and use of bouldering mats only within a limited number of Designated Climbing Areas (yet to be determined).	Immediate
<ul style="list-style-type: none">• Determine sites to be assessed for their suitability for management of bouldering.• Assessment to consider threat to cultural and natural values and methods for containment of impacts and mitigating risks.• Where supported, site controls may be required prior to permitting the activity.	

Additionally from page 102:

Bouldering and the use of bouldering mats will not be permitted in most Designated Climbing Areas due to the assessed risks and impacts. The evaluation and determination of a limited number of bouldering sites within a few Designated Climbing Areas will consider the need for sites to be able to accommodate intensive use and will determine the feasibility and the appropriateness of containing and mitigating impacts. Where supported, site controls may need to be implemented prior to permitting the activity.

As already noted, bouldering is a relatively new activity. Growth is stimulated by indoor bouldering gyms. It is expected that this will lead to more people wishing to boulder in the outdoors and experience the full joy of the activity in a natural outdoor setting on real rock. As such bouldering is another gateway opportunity for people to get outside and experience the outdoor world. From doing so, a respect and support for this environment can be developed.

Bouldering like any other activity cannot be carried out without some impact on the natural environment. The challenge is to minimise this impact and keep it within agreed acceptable limits.

Strategies for good management of bouldering need to be better developed. Strategies can include:

Currently, permitted locations for bouldering are almost non-existent. The Priority 1-3 list in this submission includes just 17 bouldering locations. This is still a very finite number of locations. A sufficient number of bouldering locations need to be allowed for in order to reduce overuse and even crowding which may occur in the future.

It needs to be accepted that there will be some visible impact around the base of boulders. However these can be contained and managed by working with Cliffcare, Climbing Stewards Victoria and boulderers to stabilise the ground and install signage and barriers to constrain the affected areas. Bouldering mats need to be permitted as designated bouldering areas as a sensible safety measure. To ban bouldering mats would be a de facto method of constraining the activity to the point it is eliminated.

If effective, seasonal closures and a rotational basis could be applied.

Recommendation 10: Allow for bouldering to properly take place in Gariwerd but develop effective management strategies to minimise the impact.

Publish an Authorised Guide

From page 106:

Publish an authorised guide, showing approved climbing and bouldering areas, access and conditions for use. Immediate

This is supported. This guide would ideally be published on-line and can be updated as required. Printed versions would also be desirable.

Such a guide should be focused on explaining the approved areas, access and conditions for use. It would not be expected to substitute for climbing guides which give more detailed information on actual climbs and grades and climbing history. The two can complement each other.

Permit System and Associated Key Conditions

From page 106:

<p>Require climbers and boulderers to obtain a free climbing permit (valid for one year) prior to climbing. Permits will only be issued following a cultural induction to ensure climbers are aware of and protect cultural and environmental values. In accordance with the permit, climbers will:</p> <ul style="list-style-type: none"> • be permitted to use temporary protection and temporary anchors consistent with minimal impact and clean climbing techniques • be prohibited from installing any fixed protection (such as bolts) or interfering with any rock, including the use of paints, brushes, adhesives, drills, hammers, chisels or similar equipment • be required to minimise the use of chalk and only use chalk coloured to match the rock (e.g. brown, grey, orange). White chalk to be prohibited. • only access climbing and bouldering areas via the designated access tracks • adhere to any area closure or restriction (such as group size), which may be applied to areas as required • acknowledge that Parks Victoria cannot warrant that any fixed equipment (bolt anchors, belay points, abseil stations etc.) has been installed or maintained at a suitable standard and that use of such equipment is at the climber's discretion and that they therefore agree to assess and accept the risk of using such anchors. 	Immediate
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From the *Overview of Rock Climbing Proposals* document “The purpose of this permit is to provide a mechanism to keep climbers updated about how and where they can climb in the landscape and to ensure everyone is aware of the conditions specific to climbing in the Gariwerd landscape.”

Permit System Feedback

1. Support the permit system on the basis that
 - a. Its purpose is primarily to as an educational and awareness tool
 - b. It remains free, as it would be counter to the purpose of the permit to introduce a fee. There is a concern that at some point in the future, new management may take a different view and see an opportunity for some revenue raising.
 - c. Cultural inductions are a great idea. They will need to be readily available especially when you consider overseas travellers that are often here for a very limited time period. It is also assumed that since they are part of the permit requirement that there would be no separate/additional charge.
 - d. The annual renewal is not an issue if the purpose is to be properly informed of any changes in the permit conditions. One assumes that the renewal would be a straight forward situation and would not require cultural inductions being repeated.
 - e. Consequences of any infractions of the permit conditions need to be made clear and should be proportionate with the nature of the infraction.

Bullet Pt 1. Be permitted to use temporary protection and anchors

No issues with this.

Bullet Pt 2. Be prohibited from...

Some of these prohibitions are problematic.

1. Prohibition of installing fixed protection – These will be covered separately in section below. *Management of Fixed Protection page 27*
2. Prohibition on interfering with any rock. It is not clear what this really means. Occasionally loose rock needs to be removed from a cliff face for safety reasons. Rock can become loose over time. Rock can also break unexpectedly. Such impacts are normally minimal, and it would be a travesty for anyone to be penalised under such circumstances.
3. Paints are not and would not be used on the rock, but paint could be used to help minimise the visual impact of bolts
4. Soft bristle brushes should be permitted for the use of the removal of excess chalk. Wire brushes are not required and the use of brushes to remove vegetation would not be permitted.
5. Adhesives, drills and hammers These are normally required for the installation of fixed anchors and will be further discussed in the Fixed Protection section.

Bullet Pt 3. Chalk

In the DMP, page 102 the issues stated with chalk are:

- “chalk on rock faces, which can be difficult to remove and can stain the surface of the cliff face (commonly associated with bouldering and sport climbing)”
- “In some locations, the aggregated impacts, including a high number of bolts, use of glue and a proliferation of chalk, is extensive and has significantly altered the natural and cultural state of cliff faces and rock shelters.”
- “Quarries likewise are also at risk from climbing chalk and rock that may be dislodged or directly damaged.”

The solution in the DMP is a specific proposal that will form part of the permit conditions:

“climbers will be required to minimise the use of chalk and only use chalk coloured to match the rock (e.g. brown, grey, orange). White chalk to be prohibited.” -page 106

It is great that chalk is not to be prohibited. It is an important requisite for climbing, especially as climbs get harder and friction becomes a vital factor. There is also the safety aspect of chalk. It reduces the likelihood of suddenly slipping off at the wrong moment.

The specific recommendation in bold above is acceptable so long as

A. Minimisation

- This should be the priority relative to a sudden move to coloured chalk.
- Liquid chalk excluding that containing rosin or gums, should be encouraged particularly for bouldering

- Consideration for the vinegar cleaning method to be approved for removing excessive chalk from high visual impact areas. Informal work has demonstrated that vinegar, a natural and relatively weak acid is effective at dissolving chalk which can then be wiped off and then finally diluted and dried away using clothes or towels. This method could be used to effectively remediate significantly affected climbs and locations.
- Confirm that brushing of chalk, (excluding wire brushes) will be accepted. Since approved climbing locations will not coincide with cultural heritage, brushes should not be an issue.

B. Coloured chalk

- A sensible phase in period to allow for appropriate and approved coloured chalk to become available on the Australian retail market
- That coloured chalk is safe for humans and the environment. It would be unfortunate if this solution caused further unintended side effects.
- That only approximate matches are expected, noting that the rock in the Grampians, even in one climb can vary substantially in colour
- Limit to only 1-2 colours in total, grey and ochre might be the most appropriate. This is a practical requirement.
- That the coloured chalk still functions for the purpose it is intended.

Finally, there needs to be a mechanism for consultation with the climbing community on chalk related aspects and the potential to implement new solutions as and when they arise.

Bullet Pt 4. Only access climbing and bouldering areas via the designated access tracks

Fully support this point for the more popular locations. Recommend work with climbers to determine effective access tracks and how to mark and maintain them. See Recommendation 2. For climbing locations that are infrequently visited implementing designated tracks may not be practical. The impact of occasional visits will be minimal.

Recommendation 11: That the priority for establishing designated access tracks is to the more popular locations but still allow access to other climbing locations even if no official designated track exists.

It was disturbing to read in the *Archaeological Field Survey of Climbing Areas*, page 23 that “The construction of cairns within any National Park is an offence”. Surely this is an over-zealous interpretation of the law.

Bullet Pt 5. Adhere to any area closure or restriction (such as group size)

This is supported, but is expected that any such closures and restrictions are applied with sound reasoning and good explanation

Bullet Pt 6. Acknowledge that Parks Victoria cannot warrant that any fixed equipment...

This is fully supported. The onus is fully with the climbers to determine the safety or otherwise of the equipment they use, including fixed anchors. It should never be the responsibility of the Land Manager unless the Land Manager starts installing or modifying fixed anchors.

Events

From page 106:

Climbing and bouldering events and competitions will not be permitted.	Immediate
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Accept this but with the exceptions of such things as

- Cliffcare style working bee
- A Welcome to Country event

Licensed Tour Operators

Page 106

Permit Licensed Tour Operators (LTOs) with existing climbing access to continue to access the areas identified in Appendix 2 and Maps 4A–4H in accordance with their licence provisions subject to periodic review.	Immediate
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No comment on this as we are not LTO's

Monitor and Review

Page 106:

Monitor and review rock climbing and bouldering areas and compliance and consider further management as required, including in response to rediscovery of Aboriginal cultural heritage or significant environmental values.	Medium
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Strongly support this in conjunction with implementing Recommendations 1 and 2 of this submission.

Management of Fixed Protection (Safety Bolts)

Much of the climbing within Victoria falls within National or State Parks and so bolting or fixed anchor policies decided in this Management Plan can have a major negative impact on climbing if the policies are not developed with due care and consideration.

Let us firstly review what the DMP says on fixed protection. This is covered on page 107.

There are the overview paragraphs:

Management of fixed protection

Fixed protection, generally bolts fixed into a hole drilled in the rock but also chains and rings for abseiling and belaying, are permanent fixtures used to anchor ropes and climbers to provide safety in the event of a fall. Sport climbing is typically reliant on the use of fixed protection; however, fixed protection may also assist traditional climbing where there are limited opportunities for temporary protection. Fixed anchors for abseiling remove the need of attaching to trees at the top of cliffs or developing descent tracks, which are often steep and environmentally unstable.

There are estimated to be thousands of anchors throughout the park installed by unknown individuals without approval from the land manager and to an unknown standard of installation. Ultimately climbers acknowledge that rock climbing is hazardous and that all protection (fixed and temporary anchors, belay points and abseil stations) is subject to a range of factors including damage from previous users, weathering and age and may not be of a suitable standard. Climbers are expected to assess each fixed anchor as a matter-of-course while climbing.

Rock bolting itself can damage rock faces and have a detrimental impact on Aboriginal cultural heritage sites. Significant impact on the natural and cultural state of cliffs has occurred through the proliferation of bolting. The assessment or removal of all unauthorised fixed anchors is, however, not feasible.

This submission has no issue with the first two paragraphs.

But the third paragraph is strongly disputed. The case has **not** been made that rock bolting has had significant impact on the natural and cultural state of cliffs.

This submission advocates that bolting has minimal environmental impact and that bolting at cultural heritage locations can be avoided. It is however acknowledged that in a very few regrettable situations bolting has occurred close to rock art. This practice is considered abhorrent and highly disrespectful of Aboriginal cultural places. Those that have impacted the cultural heritage in this way should be where possible identified and appropriately punished by the full force of the law. So, let's go back to the very basics.

What is bolting?

Safety bolts are a means to protect the climber from falls that would otherwise be dangerous. Safety bolts are predominantly used in Sport climbs, but they can also be used to protect blank sections of Trad climbs and to provide belay/descent anchors at the top of climbs. Safety bolts are left permanently in the cliff.

Sport climbs are ones that have bolts placed at spaced intervals up a climb. At Gariwerd typically, there will be 5-10 safety bolts in a climb plus two anchor bolts at the top of the climb.

Modern safety bolts are typically made from stainless steel. To place a bolt a hole typically 80-100 mm long and 10-12 mm in diameter is drilled. This is about the size of a person's finger. Depending on the type of bolt being placed they are either glued in place or expansion bolts are used. The glue in safety bolts are generally regarded as best practise for Gariwerd sandstone. Bolting practises have evolved over time and it is common for older style bolts to be removed and replaced with more durable and reliable bolts. In Gariwerd, well-placed stainless-steel bolts will be safe to use for many decades.

Images: Safety Bolting examples

			
A glue in ring bolt	Ring bolt placed in rock	Bolt with hanger	Bolt and hanger camouflaged to blend in with rock

What is the environmental impact caused by bolting?

Is any flora or fauna harmed by bolting? No.

Is the rock altered in any way? Minimally, a small hole is drilled in the rock, but it is hard to construe that this is a significant impact. Even if you consider that there are several thousand bolts in Gariwerd, the square metreage of bolted rock is infinitesimally small compared to the total amount of rock in the landscape.

Is there a visual impact? There is a small visual impact, but it should be noted that, this is minimal. Bolts other than those close to the ground are often hard to see. Furthermore, most of the climbing locations are places where only climbers go, so the only people that will see them are other climbers. It is suggested that if bolts exist in areas where non climbers are known to go that they be camouflaged and even the bolts closest to the ground removed as modern stick clipping technology allows bolts as much as even 4-5 metres above the ground to be clipping. There are only a few instances where this might be applicable. They include Sandinista and Bundaleer, which are both listed in the DMP as Climbing Not Permitted locations. Epsilon Wall is another possible location, which is located close to the Peaks Trail.

Overall, it can be concluded that the environmental impact of fixed anchors (bolts) is minimal and cannot be regarded as significant.

What is the cultural impact caused by bolting?

From page 21 of the associated document "Archaeological Field Survey of Climbing Areas":

There is no comprehensive and verified dataset of bolts in climbing routes, and no known instances where bolts have been installed or managed officially by Parks Victoria. However, assuming between five and seven bolts per climbing route in the Grampians National Park (and accounting for variation in climbing styles), it is estimated that there is possibly at least 10,000 to 15,000 bolts in catalogued climbs. Installation of bolts is widespread practice, except for bouldering locations. Bolts of various types with and without hangers were observed at each climbing location visited, frequently in the ceiling of larger caves or rock shelters that are now registered Aboriginal places. Bundaleer is an interesting case study, with its long history of tourist visitation due to the rock shelters and views. This Aboriginal place has been extensively damaged by tourism with pedestrians walking through and camping within the rock shelters over more than one hundred years. It is notable here that impacts from tourist recreation are distinguishable from impacts that are specifically climber-related, such as the observable modern, abandoned, vintage and broken climbing bolts that perforate the walls and ceilings. This indicates that climbing has, in a cumulative fashion and over the long term since the late 1950s, damaged the cultural heritage of the Aboriginal place (see [Error! Reference source not found.](#)).

The initial threat posed by bolting is observed to be the placement of the first bolt, which generally occurs within the first five metres of the ground surface. This roughly correlates with the zone in which any physical evidence of tangible Aboriginal cultural heritage will likely be faded or visible on the ground surface. The installation of bolts is a possible offence against the National Parks Regulations because interfering with rocks or similar natural objects is prohibited, as is doing any act that is hazardous to the preservation of the cave.

Where bolts have been placed in Aboriginal places, this is apologised for. It is most likely that they have been placed in such locations due to lack of awareness of cultural considerations.

To the best of our knowledge, no climbing bolts have been placed directly into Aboriginal artwork, but one was placed in close proximity and this has since been removed.

With the cultural heritage survey work being carried and the implementation of appropriate measures in the placement of bolts in locations containing cultural values can be eliminated.

Are there any intangible cultural values that climbers need to be aware of? We have not been made aware that bolting could impinge on intangible cultural or aesthetic values.

Is Safety Bolting Legal?

From page 21 of the associated document “Archaeological Field Survey of Climbing Area is this regulation is from National Parks Regulations 2013:

Regulation 53: Interfering with rocks or similar natural objects prohibited

- (1) A person must not damage, deface, remove or otherwise interfere with any rock or similar natural object in a park.

Penalty: 20 penalty units.

It is contestable whether or not bolting falls within the scope of Regulation 53. Is drilling a small hole really damaging the rock? It is certainly not defacing the rock and rock is not being removed. Is it being interfered with?

One might suspect that this regulation was written with rather more significant impacts in mind such as quarrying, mining, graffiti, or taking of precious stones and the like.

The writer does not know whether this regulation has only been in existence since 2013. If it is a new regulation, then bolting prior to 2013 clearly would not have been illegal.

Safety bolting has been known of by the Land Manager for many years, but no actions have been taken until recently to control, manage or prevent bolting within Gariwerd. The actual DMP certainly does not make any statements or implications that bolting is illegal.

It is concluded that the legality or not of bolting within National Parks is questionable.

Recommendation 12a: An independent ruling be obtained to determine whether safety bolting in National Parks is permitted or not. If this is pursued, then climbers should be able to present their case.

Recommendation 12b: Amend Regulation 53 to specifically allow the installation of safety bolts under agreed circumstances.

Fixed Protection Management Strategies

From page 107 of the DMP:

Goal – Management of fixed protection		
Fixed protection is managed to support safe climbing opportunities within designated climbing areas, minimise impacts on the park and clarify climbers' own risk.		
Strategies		Priority Level
1	Do not allow the installation of new anchors.	Immediate
2	The use of temporary protection and temporary anchor points is permitted consistent with minimal impact and clean climbing techniques.	Immediate
3	Work with the climbing community to ensure existing anchors are only removed or replaced with the authorisation of Parks Victoria. Close any climbing areas where unauthorised replacement or addition of anchors occurs.	Immediate
4	Ensure climbers are aware of the risk of fixed protection and that Parks Victoria cannot warrant that any fixed equipment (bolt anchors, belay points, abseil stations etc.) has been installed or maintained at a suitable standard, that use of such equipment is at the climber's discretion and that they therefore agree to assess and accept the risk of using such anchors.	Immediate
5	Remove anchors in areas where climbing is not permitted.	Medium
6	Remove or disable anchors within declared Remote and Natural Areas. New anchors or replacement of anchors are not to be authorised in RNAs.	Medium

Considering each strategy:

Strategy 1. No New Fixed Anchors

This submission advocates for the allowance of new fixed anchors under the following circumstances.

1. Installing descent anchors at the top of climbs, including Trad climbs.
The reason for this is that lowering off or abseiling from the top of climbs will be a lesser environmental impact compared to walking off or abseiling off trees. Walking off can require descending steep terrain and can create further tracks and erosion. Abseiling off trees can damage the trees. Applying the principle of minimising the environmental impact, descent bolts are the sensible option in many situations.

2. Replacement of existing bolts or pitons that are no longer deemed safe by climbers. This is a practical safety requirement. This aspect is partially covered by point 3 above.
3. Creation of new sport routes or mixed trad routes at climbing locations that already contain sport or mixed trad routes, but not at climbing locations that are Trad climbing locations.

This will create more climbing opportunities at existing approved venues. This could well be important if climbing increases in popularity and yet the total number of climbing locations remains static. It will also allow for new hard routes to be created to provide challenge for the next generations of climbers.

Such locations would already have been surveyed so the risks to accidentally harming Cultural Values is likely to be very low. To further reduce any such risk, it could be agreed that no bolts would be placed within 3 metres of the ground.

Strategy 2. Use of Temporary Anchors is Permitted

This is supported

Strategy 3. Removal and Replacement of Existing Anchors

1. Glad to see that this will be permitted, but it is also requested that a scheme is developed that is not overly bureaucratic that would impede the quick action of attending to safety issues.
2. It is highly unacceptable that, *any unauthorised replacement or addition of anchors would result in the closure of climbing areas*. This goes against natural justice. Why should all other climbers be punished for the actions of one or a few. Please change this!

Strategy 4. Climbers not Parks Victoria are responsible for their safety when using Fixed Protection.

As previously noted, this is fully supported.

Strategies 5 and 6. Removal of Anchors in areas where climbing is not Permitted

It is a questionable use of resources to try and do this. Surely funds could be better spent on other activities. One exception might be where bolts are in areas of specific Cultural Value.

Concluding on Fixed Protection

Recommendation 13: Bolting policies need to be developed in consultation with the climbing community that are not overly draconian and out of kilter with the very low impact that bolting actually has. Any such policy should take into account the points made in this Submission.

Camping

One final call is that additional free camping areas be included throughout Gariwerd. Camping in relative wilderness of Gariwerd, underneath the southern stars is often one of the more memorable and impactful and enriching ways to fully experience the beauty and wonder of this landscape.

Respectfully we request that more free camping locations be allowed for in the various parts of Gariwerd.

Recommendation 14: Allow for more free camping locations throughout Gariwerd.

Conclusions

The DMP shows promise for allowing rock climbing to continue in Gariwerd, but only if it is modified to take into account the points made in this submission.

It is the belief of the author of this document and it's supporters that the opportunities for climbing and bouldering within Gariwerd can be much improved upon and that this can be done in a way which does not have any significant adverse impact on cultural or environmental values.

This in turn will help achieve the premise of "Healthy Parks Healthy People".