



Gariwerd Wimmera **RECONCILIATION NETWORK**

www.gwrn.org.au | info@gwrn.org.au

Submission to the proposed Greater Gariwerd Landscape Management Plan

Acknowledgement of Country

The Gariwerd-Wimmera Reconciliation Network acknowledges the Wotjobaluk, Jaadwa, Jadwadjali, Wergaia, Jupagalk, Djab Wurrung and Gunditjmara peoples, the Traditional Owners of Gariwerd, and support their efforts towards the full exercise of their self-determination. We are grateful to them and others for sharing their knowledge and stories in the submission documents. Through their efforts we deepen our connection to their land and develop more understanding of our shared history. We pay our respects to their elders past and present, and we hope that their efforts will help us come together with more knowledge and connection to build strong communities in the Gariwerd-Wimmera region.

Table of Contents

A. Executive Summary	2
B. Four priority areas for consideration	3
C. Gariwerd-Wimmera Reconciliation Network and climbing access	4
D. Reconciliation-based considerations regarding the future Greater Gariwerd Landscape Management Plan.....	4
1. Clarification of process for developing mitigation measures to allow cultural values and climbing to coexist under the Rock Climbing Decision-Making Framework.....	5
2. Development of a reconciliation-led review mechanism for decisions made under the Rock Climbing decision-making framework.....	5
3. Development of mechanism to allow Traditional Owners and Land managers to entrust a trusted third party to manage climbing areas	7
4. Transparency around decision-making responsibilities between Parks Victoria and Traditional Owners as appropriate	8
5. Template for rock climbing decision making should be considered for other recreational users.....	9
6. Supporting the leadership of Traditional Owners in developing relationships with local communities / recreational users and encourage adaptation to proposed changes.....	9
E. Priority climbing locations for assessment	10



A. Executive Summary

The Greater Gariwerd Landscape Draft Management Plan (DMP) is a chance to work towards a management of Gariwerd that aligns with Traditional Owners' aspirations and priorities and allows them the expression of self-determination. This plan has the potential to become a leading example of how Traditional Owners, colonial government and civil society can work together to achieve ethically sound and environmentally sustainable recreational activities in settler-colonial societies. Our vision for climbing in the Greater Gariwerd cultural landscape is for continued access to a diversity of terrains based on respectful interactions, where ultimately climbers have a deeper connection to this place through learning about Traditional Owners' culture, history and perspectives. Through respectful climbing in the landscape, we hope that climbers can positively contribute to the cultural renewal and healing of Traditional Owners.

Gariwerd Wimmera Reconciliation Network (GWRN) works at the intersection of reconciliation, recreation and social and legal issues. Our work in reconciliation and climbing access has positioned us to observe the threats to reconciliation through the division and disintegration of relationships between Park managers, recreational users - in this context, rock climbers - and Traditional Owners. This includes the impacts on respect for Culture, social responsibility, and recreational user compliance of the use of a blaming focus - both of the recreational users for implied impacts and of the Traditional Owners for implied restrictions to access - rather than a cooperation, accountability and conciliation focus.

This submission highlights how the plan can avoid contributing to more divisive problems and proposes cooperative management solutions in numerous ways. The submission underlines shortcomings in the clarity of the process for developing harm mitigation strategies and asks for detail around decision points for initiation of any strategies. It also highlights the lack of a stated review mechanism within the plan and encourages one to be developed with a reconciliation lens to allow the plan to adapt to new knowledge, technology and climbing practices.

Understanding constraints of land managers' and Traditional Owners' limited resources and given the stated intention of the Traditional Owners to keep climbing open where possible, this submission also points out where cooperative community-based solutions and utilisation of third party established groups such as Cliffcare or a climbing peak body could be entrusted with management of some appropriate areas. Greater transparency and clarity is also proposed regarding the delineation of decision making responsibilities between Parks Victoria and Traditional Owners and, where appropriate, reasoning for climbing access decisions. The benefits of an open and collaborative approach would support building informed relationships and trust.

Our submission suggests the investment in developing an effective recreational decision making and review process for rock climbing is likely to translate to other recreational activities where impacts on cultural values may be of concern. Using the same process for other recreational activities in the Gariwerd landscape may prevent a replay of the challenges



observed in rock climbing and provide greater equity and transparency of process for all user groups in the National Park.

Finally, GWRN advocates for greater support of Traditional Owners in developing relationships with local communities and recreational users. Advantage could be found in giving joint projects and community engagement the same 'immediate' priority granted to other reconciliation related strategies in the plan.

These improvements to the plan should allow for learning, growth and trust through shared knowledge and experience while prioritising protection and accountability and remind us all that systemic change is essential.

Reconciliation and self-determination should be at the foundation of the plan and the system it helps redesign. We are optimistic about the potential of the plan to inform a system that responds to Traditional Owners' physical, mental, emotional, economic and social needs, and allows climbing to continue in ways that support those needs. As a community, we need a management plan that supports the renewal of Traditional Owners' cultures, and allows space to progressively permit climbing and climbing practices as the relationship between Traditional Owners and climbers develops, and as Traditional Owner aspirations and preferences evolve.

B. Four priority areas for consideration

1. Clarification of process for developing mitigation measures to allow cultural values and climbing to coexist under the Rock Climbing Decision-Making Framework¹
2. Development of a reconciliation-led review mechanism for decisions made under the Rock Climbing decision-making framework.
3. Development of mechanisms to address instances where Traditional Owners/Land managers may rely on a trusted third party to manage mitigation of climbing areas.²
4. Transparency around decision-making responsibilities between Parks Victoria and Traditional Owners as appropriate.

The above considerations and two others are explained in more detail in Section D.

¹ Parks Victoria, *Rock Climbing Decision Making Framework for the Gariwerd Landscape* (Parks Victoria, 2020) <https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.vic-engage.files/8916/0500/8829/Rock_Climbing_Decision_Framework_for_the_Gariwerd_Landscape_Nov_2020_v3.pdf>.

² Ibid 6, Management Principle 9.



C. Gariwerd-Wimmera Reconciliation Network and climbing access

GWRN was formed by members of the rock climbing community in mid-2019 based on realisation that a critical conversation with Traditional Owners was needed in light of access disputes occurring in the Grampians National Park. We were aware that the frustration of Traditional Owners was growing and that it was time critical to start a process of listening and learning and acknowledging harm that may have resulted from recreational impacts associated with rock climbing.

GWRN's vision is for strong communities to be built through respectful relationships. Respectful relationships in the context of contemporary Australian society must recognise and give voice to Aboriginal and Torres Strait Islander peoples and their history so that informed decisions about their land can be made by and for their communities.

We aim to be a resource for the Traditional Owners of Gariwerd cultural landscape represented by the Barengi Gadjin Land Council (BGLC), Eastern Maar Aboriginal Corporation (EMAC), and Gunditj Mirring Traditional Owner Traditional Owners Aboriginal Corporation (GMTOAC), and the climbing community. In regard to Gariwerd climbing access issues, we have given climbing information to Traditional Owners, and provided information to the climbing community about reconciliation.

To this end, we have promoted reconciliation through Reconciliation Victoria grant activities, our website and social media content, and we were invited to and contributed to cultural heritage assessments on Country by BGLC, EMAC and GMTOAC to provide information about climbing practices in Gariwerd and Dyurrite. More than 250 people have expressed support for our work in Dyurrite. We expect that this support extends to our work in Gariwerd.

GWRN supports the DMP as a pathway to building a foundation for self-determination for the Gariwerd Traditional Owners. We support their aspirations to recognise, respect, protect and celebrate cultural values in Gariwerd and their efforts to renew culture and knowledge. We hope to continue our work as a resource for Traditional Owners as and when they deem it appropriate.

D. Reconciliation-based considerations regarding the future Greater Gariwerd Landscape Management Plan

GWRN is fully supportive of the need to enjoy Gariwerd in ways that are respectful, promote healing and cultural renewal, and enhance the serenity of Country. To that end, GWRN puts forward the following six considerations, based on reconciliation, that should be incorporated in a future Landscape Management Plan.



1. Clarification of process for developing mitigation measures to allow cultural values and climbing to coexist under the Rock Climbing Decision-Making Framework

The rock climbing decision making framework outlines a workflow process,³ and Management Principle 2b provides that climbing may be permitted where Aboriginal cultural values are present, but there is demonstrated capability to appropriately and effectively mitigate the risk of harm to these values.⁴ This seems to appear in the workflow diagram as two decision points: "preservation values" leading to a "yes/no" decision.⁵ However, the decision making framework document does not appear to elaborate on mitigation assessment principles or outline a process for this. Neither is there further elaboration in the workflow diagram. **The future GGLMP should outline a mechanism for determining whether cultural values and recreational activities can coexist if mitigation measures are implemented. This would contribute to the credibility of the document and promote compliance with it.**

The final plan should clarify:

- mitigation assessment and strategy development processes to allow cultural values and climbing to coexist; and
- what is meant by the "Preservation values" decision point in the Rock Climbing Decision Making Framework to indicate what inputs determine the "yes/no" decision.

In particular, 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. We believe that this process could be developed from the process undertaken at Taipan Wall by GWRN and the Gariwerd Traditional Owners.

We agree with a process that leaves decision making authority with the Gariwerd Traditional Owners in partnership with the land manager, but we believe that including input from recreational users will ensure fully informed decision making and help satisfy the climbing community that there has been formal consideration of their views. This will ultimately lead to higher levels of compliance with management directions and respect for decisions that result in necessary closures.

2. Development of a reconciliation-led review mechanism for decisions made under the Rock Climbing Decision Making Framework

The Rock Climbing Decision Making Framework Management Principle 10 notes that where new information about values becomes available that decisions should be reviewed.⁶ **A review mechanism should be developed and made public, and Management Principle 10**

³ Ibid 8.

⁴ Ibid 5.

⁵ Ibid 8.

⁶ Ibid 6.



should be phrased to allow for review where changes in climbing practice and errors made in first instance decisions are identified.

A review mechanism would function as both a process for correcting errors in decision making and clarification of the ideas underpinning the new Landscape Management Plan, and for adapting decisions made under the management plan to change along with developments in climbing technology, practice, and climber attitudes.

The success of the Rock Climbing Decision Making Framework in the future Landscape Management Plan, by which we mean high levels of climber agreement and compliance, hinges on the development of a robust review process that would allow Traditional Owners to lead review of decisions. This would enable Traditional Owners to achieve their stated aim of keeping climbing open where appropriate, and achieve nuanced decisions regarding climbing access (for example, the process being followed to make decisions about Taipan Wall).

It seems almost unnecessary to point out that climbers are technical experts in their recreational activity, while Traditional Owners and Parks Victoria are in the position of making decisions about how, when and where climbing may take place. However, it should be recognised that the imbalance in knowledge and familiarities with each others' expertise (ie, climbing knowledge, Traditional Owner law and culture, bureaucratic and governmental process and language) carries a significant potential for miscommunication and misunderstanding. Failure to take this into account may ultimately adversely affect the fairness and credibility of the future Landscape Management Plan.

An example of an area in which potential for misunderstanding may occur is where climbing areas examined are named differently in decision documents about closures. In the *Greater Gariwerd Landscape Draft Management Plan: Rock Climbing, Abseiling and Bouldering Overview*, the section detailing proposed decisions assessed climbing areas mentions an area it calls "Sundial Peak".⁷ The table notes that there are 0-5 routes in the area but does not mention a large and popular bouldering area known to climbers as "The Bleachers". The table seemingly conflicts with information on theCrag.com, which outlines that the area contains 54 boulders and 25 climbing routes.⁸

While the information contained in the Parks Victoria table is not wholly incorrect, it creates fertile ground for misunderstanding and may indicate mistake or a lack of information on the part of the decision makers. The development of a review mechanism would promote the transparency and reliability of the Rock Climbing Decision Making Framework among climbers.

In addition, climbing is an activity that changes quickly; climbing practices shift with technological advances, climber values, and changes in the built and natural environment.

⁷ Parks Victoria, *Greater Gariwerd Landscape Draft Management Plan: Rock Climbing, Abseiling and Bouldering Overview* (Parks Victoria, 2020) <https://s3.ap-southeast-2.amazonaws.com/hdp.au.prod.app.vic-engage.files/2116/0499/1966/Rock_climbing_oerview_with_maps.pdf>, Table 1, 9.

⁸ "Sundial Peak", *The Crag* <<https://www.thecrag.com/en/climbing/australia/grampians/sundial-peak>>.



Examples are the development of chalk alternatives, and the evolution and development in climbing practice from traditional climbing, to sport climbing, to bouldering.

A review process would allow for robust and agile decision making around the practice of climbing. This is particularly important for bouldering, as bouldering practice has the capacity to evolve and respond to Traditional Owner concerns around cultural and environmental harm and the need to respect the serenity and healing of the Gariwerd cultural landscape.

Any review process developed should follow best practice and be based on administrative law principles and/or other relevant Traditional Owner legal principles. A review process should include the following stages:

- Identifying the key issues through a process that allows climbers to approach Traditional Owners/Parks Victoria with potential errors and requests for changes;
- Gathering evidence through reliable sources of climbing information, including but not limited to GWRN;
- Assessing evidence;
- Making informed decision based on accurate climbing knowledge; and
- Recording the decision and publishing reasons for decisions where possible.⁹

3. Development of mechanism to allow Traditional Owners and Land managers to entrust a trusted third party to manage climbing areas

Management Principle 9 of the Rock Climbing Decision Making Framework provides that where the land manager and/or Traditional Owners do not have the resources to actively manage a site where values are present, that the site will be closed to climbing.¹⁰ **In light of Traditional Owners' intention to keep climbing open where possible, Management Principle 9 should be reframed to allow Traditional Owners to entrust the management of a site to third party organisation trusted and led by them, where they are capable of managing a site in a way that promotes and supports the stated goals of the Traditional Owners.**

There is much energy in the climbing community to assist in the management of climbing areas. This energy could be harnessed in the management of the few climbing areas that are currently open and experiencing more traffic. The increased pressure on environmental values may lead to more closures. This is particularly obvious in bouldering areas. This might be avoided by utilising the climbing community as a resource for management.

There is a long history of user groups, including climbers, carrying out work in Gariwerd in conjunction with Land managers. Previous examples of climbing organisations working with the Land managers on mitigation measures at Bundaleer and Back Wall show that this is

⁹ The Australian Public Service Commission has created a useful guide to developing robust review mechanisms. Australian Public Service Commission, "The Review Decision Making Process" <<https://www.apsc.gov.au/review-decision-making-process>>.

¹⁰ See above footnote 1, 6.



possible but these were flawed by not being supported by a formal framework. This lack of structure led to shortcomings in compliance and consultation.

A formal framework with a climbing access body such as Cliffcare or a climbing peak body could supplement the resources of Traditional Owners and Land managers in this regard. There are precedents for Traditional Owners and recreation organisations developing Memorandums of Understanding for carrying out activities on Country, for example the agreement between the Dja Dja Wurrung Clans Aboriginal Corporation and Bendigo Orienteering.

4. Transparency around decision-making responsibilities between Parks Victoria and Traditional Owners as appropriate

The DMP notes that the relationship between Parks Victoria and Traditional Owners is still forming, and decision-making responsibilities are in development.¹¹ **Once decision-making processes have been settled between the Gariwerd Traditional Owners and Land Manager has been settled, the decision-making workflow, which clarifies which part is responsible for what kind of decisions 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, which will ultimately promote a greater sense of trust in land management decisions.

In addition, reasons for climbing closures should be published and made easily accessible as far as appropriate. This would enhance recreational user trust in decisions made under the plan. An example of where this might be applied can be found in Table 1 of the Rock Climbing Decision Making Framework, which provides a list of the assessment status of 281 climbing areas.¹² The table could be expanded to include one column that explains in as much detail as appropriate why a climbing area is closed. For example, it could list "cultural values" or "environmental values" and a reference to applicable management zones and overlays. Currently to find out, users must cross reference back to Map 2 in the same document,¹³ which is an unnecessarily time-consuming process and is provided in a resolution that makes it difficult to determine precise locations.

¹¹ Parks Victoria, *Greater Gariwerd Landscape: Draft Management Plan November 2020* (Parks Victoria 2020) <www.engage.vic.gov.au/gariwerd-management-plan>, 135.

¹² See above footnote 1.

¹³ *ibid* 17, Table 2.1



5. Template for rock climbing decision making should be considered for other recreational users

The investment in developing an effective recreational review process for rock climbing is likely to translate to other recreational activities where impacts on Cultural Values may be of concern.

This can help to:

- Prevent a replay of the challenges observed in rock climbing over the past two years with other recreational user groups;
- Create greater certainty about the change processes, which will help communities more effectively plan for and manage any social or economic impacts,
- Give recreational user groups greater opportunity to proactively adapt and a structure within which explore and propose potential mitigation strategies;
- Increase the opportunity for development of trust and cooperation, which can promote better race relations and result in just and sustainable decision making.
- Provide greater equity and transparency of process for all user groups in the National Park.

A broader overarching decision making template for all recreational activities in the Gariwerd landscape would create clarity and equity over decision making processes and hand Traditional Owners a broader framework for ownership of the process and the greater opportunity for self determination.

6. Supporting the leadership of Traditional Owners in developing relationships with local communities / recreational users and encourage adaptation to proposed changes

We are in full support of the goals of reconciliation outlined in the draft plan at Section 3.3, and we note the value of truth telling to build more accurate, shared histories of Traditional Owners and colonial experiences in the Gariwerd landscape.¹⁴ We note that the priority given to most of the reconciliation related strategies in the documents are given an 'immediate' priority level, which we strongly support. However, in Chapter 6 the strategy regarding joint projects between Traditional Owners and other Victorians at subsection 6.1 is given 'Medium' priority.¹⁵ We also note that most of the strategies in the 'Working with Community' subsection are also 'Medium' term priorities.¹⁶

Given the experiences we have had working with Traditional Owners in discussing and proposing solutions to access issues for rock climbing at Taipan Wall, we believe that the possibility of reconciliation projects with community can be realised in the shorter term: in our view, they have already started. Moreover, there are likely to be benefits for such projects

¹⁴ See above footnote 11, 31-34.

¹⁵ *ibid* 136.

¹⁶ *Ibid* 40.



being supported and responded to by PV in the more immediate term than currently proposed.

We consider that the draft plan will be more effectively implemented if reconciliation-led conversations and solutions agreed between Traditional Owners and community groups are acknowledged proactively by PV. As an example, the Taipan Wall project, which was initiated at the request of the Gariwerd Traditional Owners and involved joint work completed with GWRN, has resulted in recommendations presented in October 2020 that are awaiting action from PV. The plan should clarify the role PV will play in responding to reconciliation projects led by the Gariwerd Traditional Owners to show respect for these joint efforts and give greater confidence to the community that these avenues of building sustainable and respectful relationships are critical to moving forward.

E. [Priority climbing locations for assessment](#)

We note that Parks Victoria requested climbers to indicate more climbing areas for review. As our focus is reconciliation we refer Parks Victoria and Traditional Owners to the Victorian Climbing Club's submission, which compiles a comprehensive list of these areas.