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**Re: Illawarra Escarpment State Conservation Area (IESCA) Draft Amendment to the Plan of Management (PoM)**

**By: ACANSW Inc**

This submission is made on behalf of the Australian Climbing Association of New South Wales Inc (ACANSW). ACANSW was formed to address climbing access issues on behalf of climbers throughout NSW and has over 500 members including the affiliated Sydney Rock Climbing Club. The aim of the ACANSW is to advocate for and promote responsible and sustainable access to rock climbing areas in NSW.

This submission focuses on rock climbing, as ACANSW's main purpose and expertise reside in this field. Rock climbing refers to all styles of outdoor climbing, including:

- Traditional climbing: where climbers place removable safety protection in rock cracks and weaknesses,
- Sport climbing: where climbers clip into pre-placed safety protection bolts, and
- Bouldering: where climbers climb close to the ground and do not require protection within the rock.

Rock climbing does not include via ferrata, zip lines, high ropes courses or slack-lining.

A copy of ACANSW Code of Conduct is provided (Appendix 1)

## **ACKNOWLEDGEMENT**

ACANSW recognise that this land is the Country of the Dharawal people and wish to pay respect to past and present Elders. We hope that we can work with local leaders to further learn about Culture and Country and to avoid inadvertent harm to Aboriginal cultural heritage.

## **General considerations**

1. Climbers appreciate the proposed amendments to the PoM to recognise climbing and welcome the opportunity to work with park management
2. Climbers have demonstrated their ability to assist with conservation efforts
3. While potential for bolting of new routes is limited, permission to replace existing bolts when necessary for safety is required
4. Any planned or future activity in the IESCA by commercial companies should not compromise existing general recreational access and cliff use by climbers  
Any new accommodation, lookouts or trails should not compromise existing natural amenity and established climbing areas

## Details for the draft plan

### 1. Climbers appreciate the changes to the management plan to recognise climbing

Climbing on the Illawarra escarpment has been documented for over seventy years with routes established at Mount Keira in the 1950's. Other areas of climbing have been active for at least 30 years with routes established at Stanwell Tops, and subsequently other areas of clean and suitable rock. The change to the management plan is a welcome acknowledgement of climbing as a legitimate use of the Escarpment cliffs and will lead to improved stewardship of the cliff environment and improved interaction with park management and Traditional Owners .

We have included the locations of current climbing areas in an attached map, and as an interactive link (appendix 2). This map includes access trails. The Illawarra regional members of ACANSW are prepared to assist with fine tuning cliff access and how this will mesh with the establishment of the Great Southern Trail.

### 2. Climbers have demonstrated their ability to assist with conservation efforts

Climbing communities have a long history of assisting with the conservation of flora and fauna. They also recognise the need to identify, respect and preserve Aboriginal cultural heritage.

Many climbers have a strong interest in the natural world and are keen to assist with conservation. If peregrine falcons or kestrels are nesting, ACANSW members ensure that details are communicated to climbers about these seasonal closures (appendix 3).

Climbing routes predominantly occur on areas of clean cliff faces. Vegetated rock is not appealing to climb on. We hope that by working with park management access to climbing areas can avoid areas of endangered flora. With increased usage by walkers we believe that formalisation of climber access and appropriate signage as used regularly in areas such as the Glasshouse Mountains, Booroomba or Mt Wellington/Kunyani will improve walker and climber safety and minimise disturbance to the environment. Existing crags usually have an indiscreet track along either the top or bottom of the cliff, parallel to the cliffline branching from existing walking tracks or firetrails. New tracks are not required.

Climbers have formed bushcare groups around NSW and worked to clean up around cliffs, unfortunately a common site for the dumping of rubbish and cars. Other Crag Care days have involved the removal of weeds and bush regeneration(appendix 4). ACANSW acknowledges the work of conservation groups such as the Illawarra Escarpment Alliance and hope to work cooperatively to learn more about local ecosystems and better communicate concerns to the climbing community. Some areas around Coalcliff have been recently added to the IESCA following the expiry of mining leases. Abandoned mining infrastructure such as rusted pipes, dams and old equipment sit in gullies around the cliffs. ACANSW members would be willing to assist in the location and support the removal of those items that are not considered heritage.

With regard to Aboriginal Cultural Heritage we recognise that areas of importance to Aboriginal people may not be apparent, or are not recorded. We would look forward

to working with local Aboriginal groups to ensure there is no inadvertent damage to Cultural heritage. Hopefully the interaction can also demystify recreational climbing which has at times been misrepresented in the press.

### **3. While bolting of new routes is to be limited, gradual replacement of existing bolts is a necessary safety precaution**

Climbers are encouraged to follow the code of conduct (appendix 1) and discuss issues with the community to ensure best practice. It is essential that climbers monitor existing anchors or other fixed protection and qualified individuals replace these when safety concerns are raised. Coastal environments are particularly prone to corrosion and replacement bolting is done using only certified and rated hardware suitable for the coastal environment (appendix 5). It is essential that permission to replace existing fixed protection is included in the PoM.

Climbers do not expect the NPWS to maintain or certify fixed protection. Each climber is expected to make their own safety assessment on every route in what is an inherently dangerous activity. The development of new routes is limited in the IESCA due to the relatively few suitable crags compared to somewhere like the Blue Mountains. Nevertheless the area is of good quality and affords climbing in a spectacular location which is of interest to locals and visitors alike.

### **4. Any use of the IESCA by commercial companies should not compromise existing general recreational access and cliff use by climbers**

We support the group size of climbing parties to be limited to 4-8 people. We would suggest that the group size proposed for other activities be substantially reduced. The proposed change to the management plan states “Group activities or gatherings involving more than 40 persons require written consent in accordance with the National Parks and Wildlife Regulation 2019.” This size seems excessive for any recreational activity. If commercial guiding companies start using trails and escarpment with even half that number there would be serious safety and environmental concerns. Large groups expand the human footprint at the cliff base. Recreational climbers typically approach a climbing day with a party of 2-4 climbers, rarely in parties larger than 8. We would expect club and commercial trips to be similarly limited to no more than two parties of four people. Some cliffs can accommodate larger numbers of people, but this should be assessed on a case by case basis.

### **5. Any new accommodation, lookouts or trails should not compromise existing natural amenity and established climbing areas**

Lookouts above established climbing areas could endanger climbers due to the possibility of thrown or dropped objects causing serious injury (appendix 6). Access trails to crags could change from those mapped (appendix 2) if the planned walking trail diverges significantly from current trails. Establishment of regular commercial use of proposed accommodation areas for the Great Southern Walk could bring

tourists with low levels of outdoor understanding to the areas. There is an increased risk of misadventure if camping areas are placed in close proximity to cliffs where there are climbers. As outlined in Point 2, recognition and signage on climbing access tracks is important

## **CONCLUSION**

**ACANSW welcomes the recognition of climbing as a recreational opportunity in the amendment to the PoM and thanks the NPWS for its inclusion.**

**We look forward to collaborating with park management to create a sustainable climbing environment.**

**The ongoing planning for the Great Walk and associated accommodation should be planned to coexist with climbing and climber access.**

**Permission for maintenance of fixed protection needs to be included in the plan rather than a moratorium on bolting (page 7 amendment).**

**Group size of over 40 is excessive and previous group size limitations seem reasonable (p3 amendment).**

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## Appendix 1: ACANSW code of conduct



### NEW SOUTH WALES CLIMBING CODE OF CONDUCT

The Australian Climbing Association of New South Wales Climbing Code of Conduct establishes the standards that all climbers are recommended to adopt in regard to their climbing activities. Climbing refers to all styles of outdoor climbing in NSW including, but not limited to, Traditional Climbing, Sport Climbing, and Bouldering.

#### **1. Access**

- 1.1. Climbers must inform themselves of the governing rules and laws that apply to each climbing site. Existing access restrictions and agreements are to be observed.
- 1.2. Climbers must act with courtesy, dignity and integrity in order to foster the trust of the general community.
- 1.3. Approval from owners or guardians of private property is to be obtained before entering or crossing over such property.
- 1.4. Sites of cultural, artistic, geological and historical significance are to be respected according to the applicable rules.
- 1.5. Climbers must carefully consider the consequences of their actions on the environment and the enjoyment of future visitors to the site.

#### **2. Impact**

- 2.1. Climbers must operate under a Leave No Trace (LNT) philosophy to minimise impact at climbing sites.
- 2.2. Climbers must not top rope through fixed equipment; top rope through your own gear to avoid excess wear on fixed gear.
- 2.3. Climbers must use existing access tracks and not leave way marks.
- 2.4. Climbers must help protect wildlife. Do not disturb nesting birds.
- 2.5. Climbers must not remove existing vegetation from a cliff or climbing site.
- 2.6. Climbers shall minimise use of Chalk. Climbers must minimise tick marks and brush chalk carefully before you leave the route in accordance with LNT principles.
- 2.7. Climbers must not climb on wet sedimentary rock as it weakens and is liable to break.

#### **3. Traditions**

- 3.1. Avoiding climber conflicts ensures better climbing. Respect established climbing traditions related to specific sites. Seek clarification on what is acceptable best practice at the site.
- 3.2. Climbers shall not modify existing climbs. This includes retro bolting, chipping holds and adding holds. Preserve climbs in the spirit of the first ascent. Do not modify a climb without the express permission of the first-ascent party, or failing that as an option, through community consensus.

#### **4. Waste**

- 4.1. Climbers must LNT. Pack out what you take in and if you see rubbish left by other users take it out too.
- 4.2. Climbers must use toilets where provided. In sensitive areas, carry out human waste. If

these options are not available, bury human waste in accordance with regulations for the site.

### **5. Camping/Parking**

5.1. Climbers must camp in designated areas only and keep campsite clean

5.2. Climbers must park in designated parking areas only.

5.3. Climbers shall only light fires in designated fireplaces in well-cleared areas. Observe all fire restrictions 5.4. It is illegal to collect firewood in the region's national parks, state conservation areas and nature reserves.

### **6. Safety**

6.1. Climbers shall keep bystanders out of the potential fall zone.

6.2. Climbers shall keep noise levels to a minimum ensures that all climbers can communicate with each other.

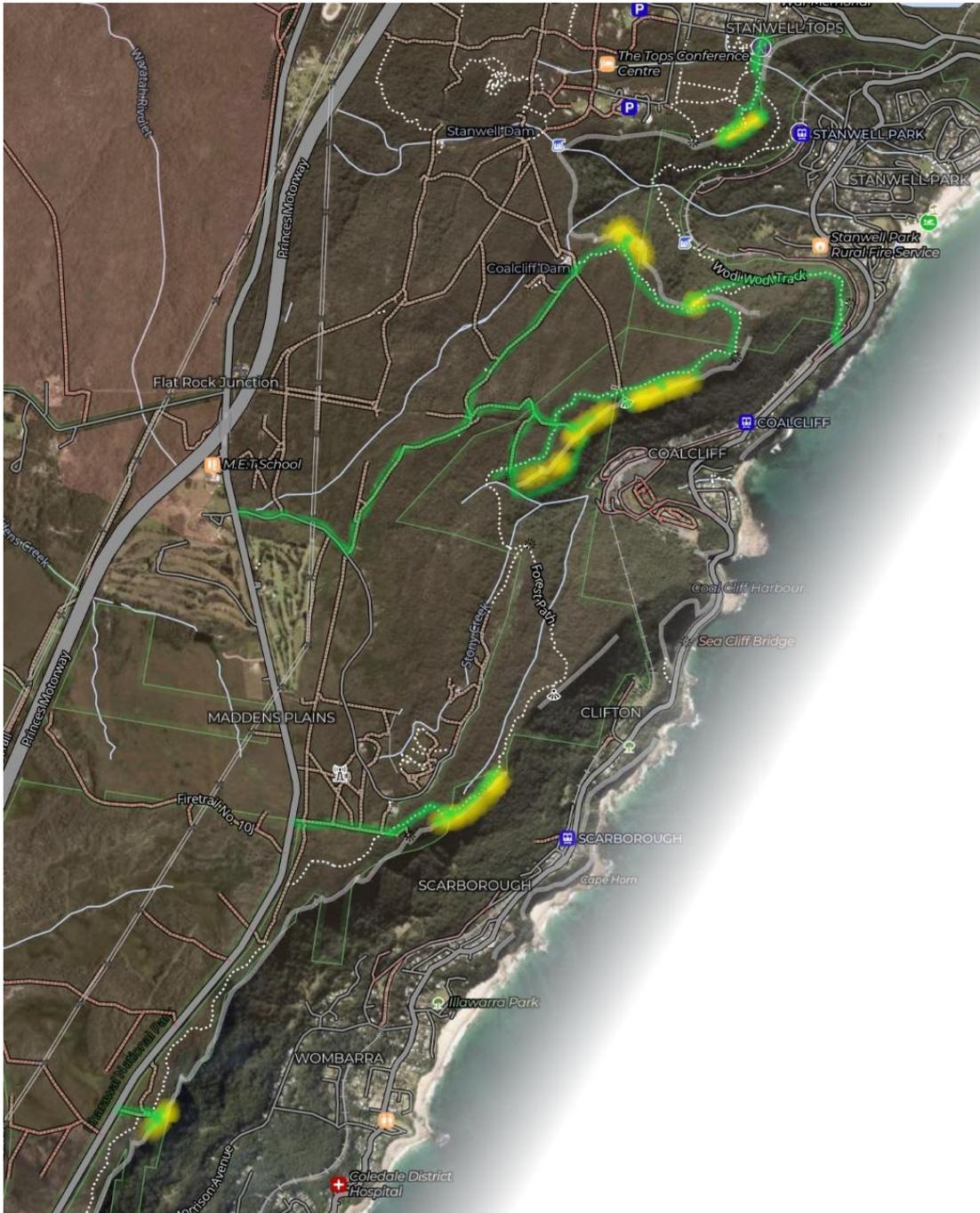
6.3. Dogs are not permitted at many climbing sites in NSW. If dogs are permitted it is the responsibility of the owner to ensure they are kept leashed and quiet so they do not distract other climbers. Dog waste must be collected and disposed of appropriately.

6.4. Climbing is an inherently dangerous activity. The climber assumes total responsibility for their own safety and decision making. The land holder accepts no responsibility.

6.5. When climbing in remote areas complete route intentions and leave with a responsible individual.

Australian Climbing Association NSW July, 2019

**Appendix 2: Locations of key established climbing areas and access trails on the Northern Escarpment (see link in appendix 3 for greater detail).**



**Legend:**

Yellow - Established cliff line climbing areas (Craggs)

Green - Marking typical access trails to climbing areas, these are predominately the existing escarpment walking/fire trails

Map data: Imagery - Mapbox, © BeyondTracks, © OpenStreetMap contributors & others, markups by ACANSW

Link to map of climbing areas and access trails:

<https://www.google.com/maps/d/edit?mid=10skV2I0VjSICF5tpBw17L4puI21XIWI&usp=sharing>

