

Canberra Bushwalking Club
Feedback on New South Wales Adventure Activity Standards (Draft 1)
Guidelines for the Safe Provision of Bushwalking

The Canberra Bushwalking Club is based in the ACT but conducts a significant proportion of its activities in NSW and therefore has an interest in the New South Wales Adventure Activity Standards (NSW AAS). The club has ~330 members

The club welcomes the commitment by the Outdoor Recreation Industry Council (ORIC) to engage with bushwalking clubs in the preparation of the NSW AAS and to ensure that the differences between the operations of these clubs and the operations of commercial operators are properly reflected in the NSW AAS. The club has recently outlined these differences in a letter to ORIC and would ask that this letter be read in conjunction with this feedback.

The club is pleased that the introduction to Draft 1 acknowledges the differences between commercial and non-commercial operators. Unfortunately, the detail of the document does not and, in its present form, is unlikely to be accepted by bushwalking clubs. Below are the club's comments on the various sections of the document:

Introduction

Use of the term 'industry' for bushwalking clubs is not particularly inclusive – we do not consider ourselves part of an industry and would prefer that an alternative term be used.

The NSW AAS are put forward as the minimum standard 'for the planning and provision of adventure activities for dependent participants'. The minimum standard outlined is clearly one designed for commercial guides and instructors with responsibility for totally dependent children. In the club's view, it is manifestly excessive for a volunteer leader taking a group of experienced responsible adults into the bush. The rider that 'organisations may choose to comply only in selected areas' does not appear to be reflected in the detail of the document.

Pre-Activity Planning

The Bushwalking Specific Factors require that 'leaders have recent "local knowledge" of the intended track and campsites'. This requirement is not practical for bushwalking clubs – a proportion of our walks will always be 'exploratory', where the challenge of heading into unknown terrain is part of the attraction of the trip. For many leaders, a requirement to go into an area before leading a walk in order to acquire this 'local knowledge' would defeat the purpose of the trip.

The requirement to carry communications equipment at all times is not realistic for bushwalking clubs. They simply do not have the resources to equip themselves with satellite phones or UHF/VHF/UF radios or to train their leaders to be radio operators.

It may be worth adding reference to the presence of shooters in an area to the circumstances where it is appropriate to modify, postpone or cancel an activity. This is particularly relevant in NSW where shooting is permitted in many state forests.

Qualifications, Roles and Responsibilities of Leaders

Any requirement for leaders without formal qualifications to have their experience documented and verified by a third party assessor would be extremely onerous for most bushwalking clubs. The Canberra Bushwalking Club has 60-70 leaders, of whom 30-40 would be active in a given year. It has an annual income of ~\$10000. After payment of costs such as public liability insurance, peak body affiliation fees, newsletter publication and venue hire for monthly meetings, it has an operating income of ~\$2000.

Third party assessment of leaders would not be financially possible for the club without a significant increase in membership fees. If required, it would also lead to the loss of a significant number of leaders, many of whom would choose to walk privately rather than offer club trips under such a regime.

The club has its own internal processes for accrediting leaders which it believes are effective and defensible. It has an extremely low rate of 'incidents' on club trips, a fact that is reflected in the low cost of its public liability insurance. Many of its leaders have been leading trips for upwards of 20 years; some have led more than 300 trips for the club.

The provision that participants other than the leader may fulfil the role of first aider in non-commercial activities is welcomed. The club's philosophy is that the responsibility for safety on a trip is shared by all and this is one way of reinforcing the philosophy.

Roles and Responsibilities of Leaders

The requirement to provide a 'reasonable level of ... instruction' may be appropriate for a guide or instructor leading an inexperienced group but is not relevant for a club leader heading bush with a group of peers. Club leaders are aware of their duty of care and duty to warn but are not normally required to provide instruction to participants on club trips.

Similarly, under the 'group of peers' model found in a club environment, each participant assumes responsibility for ensuring that her/his equipment is in a safe and serviceable condition.

It is not clear whether the Adventure Activity Plan, the Environmental Sustainability Plan and the Emergency Response Strategy are intended to be generic organisational documents or trip specific documents. The impression given by commercial operators represented at the NSW AAS Information Forum at which the club was represented was that these were completed for each trip. This may be appropriate for an operator who, typically, has a relatively small number of trips that are regularly repeated. It is not appropriate for a club such as the Canberra Bushwalking Club that typically offers 200-250 activities each year, few of which are repeats.

Group Management Practices

The document recommends that ALL listed aspects be communicated effectively during a pre-activity briefing. Again, this may be appropriate for a group of inexperienced children but is not so for a group of experienced responsible adults. For example, the club has minimal impact guidelines that all members are expected to understand and follow. The club does not require its leaders to brief participants on these guidelines before each

walk. It does not consider that its members need a pre-trip briefing on personal hygiene or sleeping arrangements.

Group Size, Activity Context and Ratios Matrix

The maximum group sizes nominated in the ratios matrix may be too large. For instance, most land managers would have difficulty accepting that 18 participants plus 4 guides was a reasonable party for a group walking in an unmodified landscape. The Canberra Bushwalking Club has an absolute limit of 16 (including leaders) on its trips and most trips in unmodified landscapes have a limit of 8 participants.

Equipment Management Practices

The requirement to carry two litres of water per day of activity should perhaps be a minimum requirement. In hot weather this will not be adequate.

The list of equipment that a leader 'must carry' is not consistent with the 'group of peers' model and the ethos of shared responsibility.

Environmental Sustainability Plan

We have not provided comment on the understanding that this is based on the existing *Leave No Trace* principles and that review/revision of these principles is not part of this process.

Risk Management Strategy

The recommendation that clubs 'seek professional risk management services' is not realistic. It may be appropriate for a peak body such as the NSW Confederation of Bushwalking Clubs to seek such services but it is clearly beyond the capacity of individual clubs to do so.

Participant Engagement

The Canberra Bushwalking Club requires all participants in its activities to sign an acknowledgement of risk that goes beyond the key points included in the NSW AAS. Participants are also required to acknowledge their obligations to the club, the leader and other participants. These obligations include ensuring that the activity is within their capabilities; that they are carrying appropriate food, water and equipment; and that they have advised the leader of any relevant medical or other condition.

Legal Aspects

We have not provided comment on the Legal Aspects section of the document on the understanding that the Victorian AAS Legal Aspects document that forms part of Draft 1 is to be replaced by a NSW specific document.

Appendix C

There appears to be a fundamental disconnect between Appendix C and the rest of the document. Throughout the document, reference is made to the skills needed by 'leaders', 'assistant leaders' and 'student leaders'. There is no reference to these in Appendix C, which refers only to the skills needed for accreditation as a 'Bushwalking Guide' or a 'Bushwalking Instructor'. This disconnect needs to be addressed.

Both of these levels of accreditation create serious problems for bushwalking clubs. Our leaders are mostly not interested in formal qualifications that would enable them to work in the 'industry' as guides or instructors – they simply want to head bush with their friends. Even if compliance remains voluntary, NSW AAS are likely to become the 'benchmark' against which clubs will be measured and there will be pressure for club leaders to become accredited. If this happens, there is a real risk that leaders will drift to private trips and that bushwalking clubs will decline. If accreditation of club leaders is to remain as a recommendation of NSW AAS, there is perhaps merit in considering expanding the levels of accreditation to include that of 'Bushwalking Leader'. This could be a 'lower' level of qualification aimed at those leading activities in a club environment and one that recognised that the skills needed to lead club trips were not the same as those needed by the guides or instructors of inexperienced participants. Such a qualification should be relatively easy to attain for experienced walkers and be only recognised in a club environment. It would not be a 'portable' qualification. This model is used by Australian Canoeing for sea kayaking activities.

Application of NSW AAS to ACT

There was discussion at the Information Forum on the possible application of NSW AAS to the ACT. At present, the Victorian AAS are in place in the ACT, on a voluntary basis. This means that unless the NSW AAS are put in place in the ACT, clubs such as ours would have two sets of standards against which they could expect to be assessed. This obviously adds a level of complexity that would be best avoided and the club would encourage ORIC to engage fully with the relevant ACT Government authorities as NSW AAS develops. If necessary, we can provide contact details for those within government with whom we dealt when the Victorian AAS were put in place in the ACT.

Stan Marks

President

Canberra Bushwalking Club

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