



THE CONFEDERATION OF BUSHWALKING CLUBS NSW INCORPORATED
PO Box 119, Newtown, NSW, 2042
www.bushwalking.org.au

Greg James
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October 28, 2009

Dear Greg,

Confederation of Bushwalking Clubs NSW Inc. Feedback on Draft 2 AAS Bushwalking

We welcome the progress made from Draft 1 to Draft 2 of the AAS documents. Specifically the Confederation welcomes the inclusion of the Independent Participant definition, and the explicit statement in the Introduction that the NSW AAS does not apply to Independent Participants. We are very pleased to see the replacement of Leadership Qualifications with Leadership Pathways which provides for Organisational Accreditation and Peer Recognition of Leader skills. It is still the Confederation's view as stated in Draft 1 comments that there should be a clear distinction between Commercial and Non-Commercial Operators throughout the guidelines and that the guidelines should not apply to Not For Profit Organisations.

We are of the view that it is the role of the Confederation as peak body of Bushwalking Clubs in NSW to provide guidelines to clubs on operational issues and risk management. This is consistent with our view, as expressed in Draft 1 comments, that it is the role of the Volunteer Peak Bodies of each Adventure Activity to write activity guidelines on behalf of Non-Commercial organisations. These peak body guidelines would provide for all Participants.

The Confederation's view is that generally Club activities are conducted for Independent Participants and the AAS will not apply. However there will be some Club activities that will attract inexperienced new members or members wishing to extend their range of experience, and/or participants who for other circumstances, may be considered dependent participants i.e. children. The Confederation is concerned with the additional workload that may be imposed upon Clubs providing activities for new members and people new to bushwalking and outdoor recreation by the AAS guidelines. As stated above it is the Confederation's view that the AAS should not apply to Not For Profit Organisations such as Bushwalking Clubs. The Confederation promotes safe bushwalking by encouraging the public to walk with a club and we will continue to do so. It is the Confederation's intention to seek legal advice on the AAS and provide interpretation of the NSW AAS to clubs within the Confederation's Risk Management Framework.

The Confederation is opposed to the Australian Canoe (AC) proposal. The Confederation believes that the AC's guidelines are inconsistent with the proposed and consistent structure of the AAS across the adventure activities of Abseiling, Bushwalking, Challenge Ropes, Mountain Biking and Rock Climbing in NSW.

In particular, the AC Safety guidelines definitions are inconsistent and conflict with those proposed in AAS Draft 2 documents. The AC Safety guidelines require the completion of Canoeing Awards for



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Leaders and do not provide for the Organisational Accreditation and Peer Recognition Leadership pathways as proposed in AAS Draft 2 documentation.

Canoeing is a significant activity for the outdoor clubs which the Confederation represent, with 68% of clubs affiliated with the Confederation of Bushwalking Clubs NSW Inc, conducting canoe & kayaking activities on an annual basis. As noted previously, the Confederation represents approximately 9000 members in NSW and A.C.T.

It is the Confederation's view that AC's Safety Guidelines will restrict the programming of Canoe & Kayaking activities on Club Programs and impose the burden of attaining of award schemes on volunteer Club leaders. We believe that many clubs will cease to provide canoe and kayaking activities if the additional leader qualifications are imposed which will have an impact on club numbers.

We have provided comments on the generic content of all documents and then specific adventure activity content for Bushwalking, Abseiling, Canoe & Kayaking, Mountain Biking & Rock Climbing. We have also provided suggested text deletions, amendments & additions using Microsoft Word's track changes functionality. This letter is to be read in conjunction with the attached documents containing marked up changes, as being the Confederations complete comments on AAS Draft 2 documents.

Legal Aspects

The Confederation is supportive of the informative legal content contained within the Victorian AAS. We would support adoption of a similar legal content specific to NSW law and legal obligations. It is our view that legal content should be complete and legal advice on the documents sought by ORIC prior to the adoption of AAS Version 1. The Confederation's current Bushwalking Risk Management Framework was reviewed by a Barrister before adoption by the Confederation and publication to Clubs and to its website.

Written Style & Format

We acknowledge that an effort to reduce the length of the document has been made, with some generic Draft 2 content yet to be condensed & finalised. We note that legal content is still to be added to the document. It is our strong view that legal content should be complete and legal advice be obtained prior to the submission of AAS Version1 for adoption to the ORIC Board.

We note the misspelling of principles, as principals, and practices as practises throughout the documents.

We also note that the generic document includes general statements which are patronizing including motherhood statements on protection of the environment. Such statements should be removed.

As in Draft 1, in Draft 2 it is unclear whether the points detailed under subsections within the all documents sections are instructions or points for consideration. For example in the Bushwalking AAS the Pre-Activity, Participant Engagement, Group Management and Equipment Management sections. The



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inclusion of some brief explanatory text to each of these sections is required for clarify that the bullet point text that follows provides the minimum range of issues for consideration. It will make for better comprehension of the guidelines and enhance the readability of the document. We have included suggested text as marked up changes in the attached Draft 2 word documents.

We recommend that as far as possible the documents use plain English to ensure understanding by the broader outdoor recreation community. And that use of full-stops, colons and/or semi-colons as appropriate are used throughout bullet point text under the various sections of the AAS.

Introduction

As the AAS Guidelines are to be voluntary, this should be stated in the introduction. This statement has been removed from the document and should be reinstated.

There is a case to be made against the use of the word standards in the title Adventure Activity Standards. Standards throughout industry suggest they are compulsory & enforceable, and this is contra to the voluntary nature of the documents. The Confederation would prefer the documents be renamed without the use of the word standards such as guidelines.

We suggest that the word “may” be added to the sentence commencing “Organisations that provide” to read “Organisations that may provide”.

We suggest that the following sentence be deleted from the introduction as it adds no value. “An appropriate interpretation of the NSW AAS is where organisational Policies, Guidelines and Standard Operating Procedures (SOP’s) are consistent with the statements in this document”. We further suggest that the word “usually” be deleted from the previous sentence to read “;an interpretation of the NSW AAS is required to apply the NSW AAS to the specific activity and context.”

The above text amendments & deletions are also included as marked up changes in the Draft 2 documentation included with this letter.

Glossary

“Glossary of Terms” should be titled “Glossary”, as a glossary is a list of terms with explanations.

The Confederation notes that it has provided ORIC with the following draft definitions. And that these are the Confederation’s preferred definitions:

“An Independent Participant is one who has the capacity to complete the activity with little or no reliance on any particular member of the participating group.”

“A Dependent Participant is one who is significantly reliant on the skills, knowledge & experience of the Leader and/or other participants during the activity.”

In the Draft 2 Dependent Participant Definition “A person who depends upon the leader for supervision, guidance or instruction to support supervised participation in an adventure activity” we recommend that supervised is deleted to provide greater clarity to the definition.



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We understand that the definition of Semi-Independent Participant (SIP) has been included to address Youth and similar programs. However, it is the Confederation's view that the definition of SIP creates ambiguity between the Dependent and Independent definitions, broadening the scope for the guidelines to be applied to Clubs and that it should be removed. We suggest the inclusion of a statement specifically addressing the needs of youth programs be included in the definition of Dependent Participant. If it must be included, then the specific aspects or circumstances under which Semi Independent Participants require Leader support must be clearly stated in the AAS.

Some Clubs have queried if the Supervising Leader is the senior leader or most responsible of the group. We suggest clarification of the role of the Supervising Leaders in the documents to ensure understanding of the broader outdoor community.

1.1 Activity Description

We suggest that space is removed from the sub heading "Urban and Metropolitan Green Space Corridors."

It is our view that a clear distinction or explanation be made between urban walks and easy walks. The current definition of easy walks would include urban walks such as the "Manly to Spit walk " which should not be covered by the AAS. We recommend that an explicit statement such as "The NSW AAS is not applicable to Bushwalks conducted in natural environments occurring within metropolitan areas" be included.

1.5 Environment

As noted in our Draft 1 comments, Club programs do not focus activities on a narrow range of sites but rather aim to visit a very broad range of locations and very infrequently revisit a site more than twice a year. A specific site plan is not viable for clubs. A generic plan is more suitable and viable for Clubs. The Confederation encourages clubs and other members of the outdoor community to adhere to its Minimal Impact Bushwalking Code. This code is sourced and referred to by several Outdoor Education text books.

2.2 Participant Personal and Medical Details

The Confederation submits that the recording of personal and medical details will require the privacy protection of such details. This may be difficult when clubs are staffed by volunteers who regularly change.

In addition, the Confederation notes that the onus is on Bushwalking Club dependent & independent participants to disclose specific conditions which may impede their ability to participate. Information of the nature detailed would be considered intrusive at club level.



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Given the existence of State & Federal Government Privacy laws, the Confederation recommends that text state “the retention of personal information is to be in compliance with the privacy principles applicable to the organisation.”

3.1 Recognition and Responsibilities of Leaders

Proposed Text for Organisational Accreditation

For Organisations adopting an internal organisational accreditation, it is recommended that Organisations have a formal written internal process for appointing Leaders and acknowledging their range of skills and experience. This process may include, but is not limited to, approval of Leaders by the Organisation’s Management or Committee or a formal position holder and/or sub committee providing oversight of the organisation’s activities.

Proposed Text for Peer Recognition and Verification

For Organisations that adopt the Peer Recognition Leadership Pathway, it is recommended that an experienced leader or group of leaders oversee the Organisation’s activity program, the development of new and existing leaders and that appropriate mentoring is provided to leaders wishing to extend their range of activities and to members who wish to become leaders. It is recommended that Organisations have a formal written Leadership Pathway.

3.5 First Aid

It is problematic to prescribe qualifications as in draft 2 AAS text and creates conflict with Activity Contexts with Easy being within 2 hours of a safe collecting feature. The Confederation recommends the following text based on the Victorian Standard:

“On every commercial bushwalking trip or any trip where participants are predominantly children (under the age of 18) it is recommended the Leader or Supervising Leader hold a current and recognized first aid certificate HLTF301b. On multi day trips into remote areas, more specialized first aid knowledge such as HLTF302B and for wilderness areas HLTF402B, may be required.

Other organizations such as clubs and community groups have a responsibility to appropriately manage likely incidents requiring first aid. Where such a group cannot ensure that one group member has currently recognized first aid ability then it is essential that participants understand this and where possible other measures are put in place to manage the risk of injury and illness.”

3.7 NSW Working with Children Check / Prohibited Persons Declaration

The text "Child related activities" needs to be clarified. The text should be in accordance with the NSW government’s Working with Children requirements found at



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<http://www.kids.nsw.gov.au/kids/working/employerguidelines/child-related.cfm>. Factors to be considered are whether the number of children on a Club trip is substantial and whether Clubs are employers within the meaning of the guidelines.

4.3 Generic Content for All Pre-Activity Briefings

This content should be included under section 4.2, and it should be included so the Pre-Activity briefing text progresses from generic to activity specific briefing content.

4.3 Group Facilitation Supervision and Management

We prefer that motherhood statements such as “check all documentation is completed prior to the activity” and “communicate information in a manner appropriate to the participants needs” are implicit leader responsibilities and unhelpful to the document. We have deleted these bullet points in the attached AAS document with tracked changes.

4.4 Activity context – Green, Amber & Red

The Confederation finds the terms Activity Context Zones to be vague and is an example of when plain English would better serve the comprehension of the AAS. We would suggest Activity Grades over Context Zones.

The sources of Activity Grades are not quoted in any of the AAS documents. This should be rectified. Earlier in the document under specific Bushwalking factors AS 2156.1-2001 Walking Tracks Part 1: Classification and Signage is cited as a reference to be used to determine the grade suitability of the intended route.

4.6 Leader to Participant Ratios

We request that this title be amended to Leader to Dependent Ratios to ensure a clear understanding throughout the broader outdoor community and stakeholders that may use these guidelines that these ratios are for Dependent Participants only. We would also prefer a statement that these are ratios and do not prescribe maximum group sizes.

5. Equipment Management

Communication Equipment

In Draft 1 the Confederation raised concerns that while the AAS document listed communications equipment to carry it did not state the limitations of each method of contacting Emergency Services. Depending on circumstances each of the following have been effective -mobile phone, written message, satellite phone (two different systems), PLB & UHF radio. However not one system worked for every situation. We recommend that the AAS refer to the limitations of communications equipment and the need for redundancy.



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Water

The Confederation recommends that water is carried in sufficient quantities, appropriate to the activity, intensity, location of known available water and anticipated weather conditions.

From the text options provided in the AAS document the Confederation suggests the inclusion of a combination of the following text:

“Based on Sports Medicine Australia recommendations on average individuals participating in adventure activities should aim to consume at least 2lt of fluid per day and more than 2lt per day in hot, dry conditions.” A citation of the source and publication from which this information is taken should be included.

“During Adventure Activities drinking water it is recommended that water readily accessible from a known water source or portable bulk storage or carried in sufficient quantities; appropriate to the activity, intensity and anticipated weather conditions.”

“And recommend, that Leaders encourage participants to consume an appropriate amount of water to avoid dehydration.”

5.1 Participants Equipment for the Activity

Footwear requirements will vary between adventure activities and that this requirement should be not adopted generically across the AAS documents but written specifically with each activity requirement in mind.

It is each participant’s responsibility to carry spare clothing for an emergency. Spare clothing should be on the participants list.

6. Environmental Sustainability Plan

Environmental Sustainability Plan does not clearly convey the message that a plan or mindset is required to minimise and manage the impact of the group on the environment, it travels through and in which it camps, abseils, kayaks, climbs and/or rides. We would suggest environmental impact as a section heading and the use environmental impact plan in text. The Confederation would prefer if the first paragraph of this sub section is deleted and 6.1 be preceded by the following, “It is recommended that organisational policies and standard operating procedures follow the Leave No Trace 7 principles”.

As noted in our Draft 1 comments, Club programs do not visit focus activities on a narrow range of sites but rather aim to visit a very broad range of locations and very infrequently revisit a site more than twice a year. A specific site plan is not viable for clubs. The Confederation encourages clubs and other members of the outdoor community to adhere to its Minimal Impact Bushwalking Code. This code is sourced and referred to by several Outdoor Education text books.

7. Risk Management Strategy



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We suggest the reconfiguration and amendment of the text as follows and as marked as changes in the attached document;

'Risk management is defined as a series of 'well-defined steps which, taken in sequence, support better decision making by contributing a greater insight into risks and their impacts'. (Australian Standard AS/NZS 4360 Risk Management).

Risk is inherent in all adventure activities, with many different Risk Management models used throughout the outdoor recreation sector.

It is recommended that as a minimum Organisations and leaders use a model that is consistent with Australian Standard AS/NZS 4360 Risk Management (represented diagrammatically below) that best suits their particular circumstances. And that Risk Management Strategies be reviewed periodically for adequacy & relevance.

8. Emergency Response Strategy

We refer to our earlier comments about the use of plain English throughout the document. We suggest the Section to be titled Emergency Response. We suggest there be one paragraph of text under the Emergency Response section heading as follows;

An Emergency Response Plan is a pre-planned series of actions to be carried out in the event of emergency. These plans may be site or event specific or more generic according to the activity. Emergency Response Plans assist individuals to respond appropriately to emergencies. Leaders and Organisations will often consider previous incidents and risk assessment when preparing and evaluating their Emergency Response Strategies.

We recommend that "Access to participant's personal and medical information" be reworded to "Access to personal and medical information as provided by participants."

For Clubs it is not necessary for Emergency Contact Person to be contactable at all times during the activity. A Club Emergency Contact Person will instigate Club Procedures for over-due parties if the group does not return in accordance with the activity plans.

Bushwalking Adventure Activity Comments

1.2 Bushwalking Specific Factors

When setting up a camp a Leader should also assess the safety/suitability of the site and factors in addition to tree fall such as the risk of flooding, protection from wind and sun.

4.2 Bushwalking Pre-Activity Briefing

The Confederation is concerned about the recommendation that the total weight of a backpack should not exceed 25% of a Dependent Participant's weight. There will be instances when an overnight



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backpack weighing 25% of an individual's weight is excessive, unsuitable and dangerous. We recommend that the total weight of the backpack is dependent upon the participant's fitness, experience, the activity and leader's judgement.

We note that it may be appropriate on an overnight or multi-day activity for a minor to share a tent with their parent, guardian or an adult taking legal responsibility for them on the trip.

5.1 Group Activity Equipment

The Confederation recommends that "Closed toe, sturdy footwear, worn at all times" be amended to include a sole that provides good grip.

In Club activities it is the individual participant's responsibility to ensure that have the equipment necessary to complete the activity. This would include equipment necessary to bury human waste.

Abseiling Adventure Activity Comments

The guidelines focus on the training of novices in abseiling at dedicated locations and specific sites. The scope of the abseiling that is covered is limited being to outdoor or indoor vertical or near vertical surfaces of undefined height and that are relatively straightforward pitches. It is not clear from the guidelines what constitutes a vertical or near vertical surface, and there are no limits on height.

Apart from training days, Clubs do not generally conduct Abseiling as a stand alone activity. It is a skill to aid outdoors travel only. Abseiling training days are dangerous activities. Once setup, ropes and anchor, should and must be rechecked during a training activity. There is the risk that after a few descents participants and leaders may not concentrate on risk points. Potential danger points (such as rope rubbing points against sandstone) are exacerbated during the day's training. There have been instances of fatal injuries occurring on the last abseil of the day. These issues are not as acute when setting up and pulling down abseils to progress across country.

We would encourage the addition of a statement detailing abseiling conditions and activities excluded from the Guidelines. A considerable amount of technical detail would need to be added to the Draft 2 Abseiling guidelines to adequately address abseiling conditions such as waterfalls (canyons), difficult bushwalking descents and caves.

We have made significant comments on Abseiling Pre-Activity Briefing, Activity Context, Leader to Participant Ratios, Group Equipment Sections, as marked up comments in the attached Abseiling Specific document

Abseiling Pre-Activity Briefing

There are many points of instruction, including the fitting of equipment, the correct use of belay systems, abseiling technique, release procedures and transfer from abseiling to fixed anchor. We do not think it is appropriate for instruction to be conducted during a pre-activity briefing. We would prefer to see these important and critical issues instructed during the activity. We recommend the inclusion of an additional section to cover instruction and conduct of the abseiling activity.



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Multi Pitch Abseiling Pre-Activity briefing, should be sub section heading. And the point immediately following should be formatted as explanatory text for following bullet points. This is shown as marked up changes in the attached Abseiling Specific document with marked up changes.

Usage Practices and Procedures the Activity.

Insert during in above heading. We note the misspelling of practices as practises.

Environmental Sustainability Specific to Activity

Bullet point two should read “Where installed artificial anchors are preferred over living tree anchors, the.....”

Bullet point 10 should read “equipment, to provide clear access for all users”.

Canoe & Kayaking Adventure Activity Comments

Canoeing & Kayaking Pre-Activity Briefing

Delete “according to the organization/owners standard operating procedures.

Intermediate Grade

“all participants are competent, both individually and as a group to deal with likely problems which may be encountered”. Would this not make the participants independent participants?

Mountain Biking Adventure Activity Comments

Mountain Biking Specific Pre Activity Planning Factors

The following text under bullet point 1, “according to the organization/owners standard operating procedures” should be deleted.

Activity Contexts

The descriptor content of the Easy & Intermediate contexts or grades is identical, so the intermediate grade text adds little value to the reader and to the guidelines. This should be rectified. The advanced context explanation of encountering traffic would be most useful to mountain biking activities of an Easy context or grade as they are likely to be conducted on unsealed roads which are likely to be used by many different outdoor recreational users

Rock Climbing Adventure Activity Comments

Rock Climbing Pre-Activity Briefing



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The bullet point “Multi Pitch Rock Climbing Pre-Activity briefing”, should be a heading within the subsection, with the text “Leaders must cover all aspects of the Rock Climbing Pre Activity Briefing plus the following” and the following point should be formatted as explanatory text for following bullet points.

Rock Climbing Adventure Activity Comments Con’td

Leader Equipment

The Confederation is of the view the following should be included in the Rock Climbing AAS under Leader Equipment:

The Confederation submits that the Leaders should carry additional prussic loops, carabiners and rope to facilitate an effective rescue.

Leaders are required to be competent at choosing and setting up anchors and belays.

Leaders should attempt to load all anchors equally.

Verbal calls should include “Rock”, “On rope”.

Ensure that all participants remained roped on when near edge of cliffs.

Double check participant’s harness, buckle and knot before committing to the rope.

The participant must be kept on a reasonably tight belay at all times.

Inexperienced participants should not belay.

Tie into an anchor.

Stay alert and focused on the climbers.

Participant Equipment

The Confederation is of the view the following should be included in the Rock Climbing AAS under Participant Equipment:

Each participant should have their own personal equipment so no sharing of equipment occurs.

All participants should be roped on when near edge of cliffs.

Footwear should have good grip.

Ratio

The Confederation submits this is more appropriate for Dependant participants.

Equipment use

Leaders to check the rope is intact and free of defects



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The Confederation welcomes the progress made with the introduction of the Organisational Accreditation & Peer Recognition Leadership Pathways Qualifications and the explicit statement that Independent Participants are not covered by the Voluntary Adventure Activity Guidelines. Bushwalking and Outdoor Clubs offer new members a safe and supportive environment to learn and participate in outdoor recreation. Clubs also provide existing members with opportunities to extend their range of experience and skills. This is an important community role played by Clubs. The Confederation is concerned that the application of the Adventure Activity Guidelines to new members and training activities may impose new burdens upon its leaders and committees and undermine Clubs capacity to support new members & training activities. The Confederation is of the strong view that Guidelines should not apply to Bushwalking & Outdoor Clubs and that Outdoor Recreation Volunteer Peak Bodies, such as the Confederation of Bushwalking Clubs, should be responsible for the provision of activity guidelines for all club participants.

The Confederation as stated in our opening remarks strongly recommends that legal advice is added to the generic content of the Guidelines and that legal advice is sought by ORIC on the documents prior to adoption as Version 1 Guidelines.

Acknowledgement

The Confederation is grateful for the detailed comments by member clubs which has greatly assisted in the preparation of the Confederation's feedback.

Yours sincerely,

Dodie Green

President

Confederation of Bushwalking Clubs NSW Inc.

On Behalf of the Confederation's AAS Sub Committee