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Willis's Walkabouts Comments on the Kakadu Draft Walking Strategy

In its present form, this will damage Kakadu's reputation as an overnight bushwalking destination to the extent that, no matter what else takes place, it will be another ten years before it recovers.

The above is a very strong statement but, in spite of the fact that I am happy with most of the contents of the document, there is one item which destroys all the good the rest of it does with respect to overnight bushwalking. That item is the proposed closure of everything above Gubara Pools on page 99. Unless this is modified, local people will take this closure the same as people in Melbourne would take it if they woke up one morning and found that Wilsons Prom had been closed because of some consultations that might or might not have taken place 20 years ago. The **'Kakadon't'** message will be screamed out for all the world to hear.

There is a way to address the concerns of the traditional owners without going this far. As someone who cares about the future of Kakadu, I sincerely hope that this will be done.

Also, the release of this document was delayed for so long that it refers to things going to happen which have already happened, e.g. 'fees to be introduced as of 1 April 2014." All such references should be changed to reflect the current reality.

Now to section by section specifics.

Section 1. Introduction

I was a member of the Kakadu National Park Walking Strategy Steering Committee. This section seems a fair statement of what took place.

Section 2. Context

2.1 Walking in Kakadu National Park

I am happy with everything in this section except for the statement near the top of page 12, "topographic map coverage was poor." The 1:100,000 topo maps which started coming out in the early 1970s were far better than the maps which preceded them. Even today, the early editions are adequate for bush navigation for anyone with decent map and compass skills.

2.2 Policy and Management Framework

This agrees with what I know.

2.3 Overview of Existing Walks

2.3.1 Overview of Existing Day Based Walks

It's good to see a table like this. An expanded version giving a little more information about each walk should be available to the public.

2.3.2 Overnight Bushwalks

This is a good statement of what has been happening. It would be good to see tables 2.1 and 2.2 updated to reflect what has happened in the two years since this draft was prepared.

2.4 Visitor Market and Trends

This is a good overview. It reflects the overall situation as best I understand it.

2.5 Existing Tourism Walk Product

Again, this is a good overview, but I need to take slight issue with one statement (p33-34), "Willis's Walkabouts trips are aimed at fit and experienced bushwalkers." Fit yes, experienced, not necessarily. From the very beginning we have attempted to cater for fit people who have done little or no overnight bushwalking before. In the early to mid 1990s, up to a quarter of our clients had little of no overnight bushwalking experience. The percentage has dropped, but we still get reasonable numbers.

In 2015 we will be trialing a few trips aimed at not quite as fit and/or intrepid walkers. As far as I can tell, even these trips will include more walking than any other tours on offer.

2.6 SWOT Analysis

This is a good summary but I'd like to expand on two points.

Weakness. Limited walking product associated with traditional owners In the past I offered trips accompanied by Aboriginal guides. It was a hard sell and when I did manage to sell the trip, I couldn't always find an Aboriginal guide.

Threats. Loss of Bininj/Mungguy knowledge about areas over time.

I suspect that this is particularly true in the stone country where most of the overnight bushwalking takes place. Much knowledge has already been lost. I fear that a lot of what remains will disappear as well.

It's not just loss of Bininj/Mungguy knowledge. As best I can tell from this document, a lot of Park Management knowledge has been lost as well, things like what research was done where and when and what the results were and which traditional owners were consulted about what.

Section 3. Understanding the Key Issues

3.1 Accessibility Constraints

Good summary.

3.2 Understanding Landowner Views

Good summary. The author of the 1996 strategy, Campbell Clarke, was not consulted to find out what consultation had been done. My impression at the time was that there had been a reasonable amount of consultation. Not consulting Mr Clarke was, in my view, a serious omission. He is easily findable on Google, still working in the tropics.

3.3 Understanding Different Stakeholder Views

Good summary. I have no issue with anything here.

3.4 Limitations of the Existing Bushwalking Permit System

Good summary. Note that the new bushwalking fees mentioned at the bottom of page 52 do not yet apply to private groups. While the fees are not particularly large, imposing them on private groups as well as tour operators would overcome some of the problems associated with multiple bookings mentioned elsewhere in this document.

Also, on page 52, it refers to 'the myriad of approved bushwalking routes, and potential circuits'. Most serious bushwalkers would think that the total number and length of the approved routes is tiny for a park this large.

3.5 Quality of Visitor Experiences

Good summary. One comment – in the table on page 55, under 'tours, activities, attractions and services', it notes, "small range of walking-based products and activities (mainly day tours) despite the diversity and strength of place values".

In 2015, Willis's Walkabouts is planning to trial two new six or seven day tours, one consisting of three two night walks, easier than anything we now offer, and the other consisting entirely of day walks. Small as it is, it is a step toward filling an empty niche.

3.6 Limited Marketing and Information

I agree with the statements here.

Section 4. Vision and Principles

4.1 Vision Statement and Guiding Principles

"The development of walking experiences will provide a catalyst for other benefits, including improved environmental management." I believe that it **could** provide a catalyst, but only if Park Management and traditional owners are willing to work with outsiders and allow them to do what they are best able to do. Refer to my submission to the Kakadu Draft Plan of Management for some specific suggestions.

4.2 Goals

In principle, the goals are great. In practice, there will be many obstacles in the way of achieving them. Financial constraints will require outside help and new ways of thinking or they cannot possibly be met.

Section 5. Strategies and Actions

5.1. Goal 1. Improve Planning and Management Systems

5.1.1 Strategy 1: Develop a Walking Policy for Kakadu National Park

In principle, this is essential. In practice, there could be some serious problems with what is produced. I will have further comments about the draft policy in Attachment 7.

5.1.2 to 5.1.4

In principle I agree with everything here. There will be problems implementing some of these ideas but the document recognises this.

5.1.5 Strategy 5: Improve Bushwalking Management Systems

"It is intended that the new bushwalking permit system will apply to all approved bushwalking routes and day walks requiring a permit." Before reading that statement and doing a bit of research on the day walks, I was unaware that there were any day walks which required a permit. The only one I have found thus far is going beyond Motorcar Falls to Kurrundie in the Yurmikmik area. Are there others? If permits are going to be required for some day walks, this needs to be publicised on the park website and with signage where those walks begin.

It recommends the "application of a fee for all permits issued." I fully support that as it would go a long way toward overcoming some of the problems associated with people applying for multiple permits and then not using some of them while others, who applied later, can't get onto a walk which apparently has no-one else on it at the time. "A new permit application process is required" Later it says, "It is intended that the Kakadu Bushwalks will be actively promoted whereas the other 'approved bushwalking routes' will not be promoted (similar to the current permit system). The current permit system, or an updated version of it, could continue to apply to these routes." Given the constraints on creating the 'Kakadu Bushwalks', what this is actually saying is that not much is going to change over the next three to five years, perhaps longer.

The examples given, e.g. the Overland Track in Tasmania, are for much smaller areas where there are well marked trails. Even there, local bushwalkers tell me that the system doesn't work particularly well for people coming in from some of the side tracks rather than those doing the through walk.

Kakadu is huge by comparison. Unless the longer routes are going to be closed, they will inevitably overlap with the shorter ones. Given the complexities, complexities which cannot be avoided other than by a mass closure of many of the current approved routes, automating part of the system will not be easy, or cheap. Having a dedicated Permits Officer will be essential for many years to come.

"New commercial operator fees (e.g. per commercial tour group – included guided bushwalking groups" **did** come into effect on 1 April last year. The wording needs to be changed to reflect this. The fees are relatively low. Imposing the same per night fee on private walkers would assist in covering the cost of maintaining the permit system.

"In the setting of walker numbers, the popularity of short overnight bushwalks (e.g. 1-2 nights) should be considered. Short duration overnight bushwalking options cater for less-experienced, and short-visit bushwalkers." Short-visit bushwalkers includes local people. I think this should be explicitly stated.

The Draft suggests that it may be necessary to consider "implementing directional routes."

I hope that it never comes to this, other than perhaps on some heavily promoted route. While Willis's Walkabouts generally goes in one direction on our longest routes, there are a number of others where we can go in either direction depending on the group and access at the time. Having this flexibility allows us to give the best possible experience to each group. That applies equally to private groups.

"Designating camping areas/zones" may become necessary in a few places as suggested near the beginning and end of particular routes. In a few cases, there are particular campsites which get heavy use simply because there are no other good options nearby. In other cases, there are a number of possible campsites within a short distance of each other. Being able to use different campsites allows different groups to move at speeds appropriate to themselves. I hope that this can continue to be the case although I recognise that it may be necessary to set minimum distances from trail heads.

"Separating group camping areas away from independent walker camping areas, as occurs in other National Parks to minimise walker conflict and environmental impacts." Unless the numbers grow far beyond current levels, doing this could deny one group or the other the opportunity to use the best campsite in quite a distance. Many sites are suitable only for small groups. Others are suited to groups of any size. That needs to be taken into consideration when allocating permits.

"Commercial operator and their guides to complete a basic in-park training program with Park staff and traditional owners, to ensure that cultural and environmental sensitivities and protocols are understood." In principle, this is excellent. In practice, it could be a disaster. With local guides hard or impossible to find, most of my guides come from interstate. How could a program like this handle someone who might come up for one trip a year? Action 6. I am very pleased to see the proposed fees will apply to both private and guided bushwalks. That levels the playing field and provides more income which can be used to improve the service.

5.1.6 Strategy 6: Improve Visitor Education, Safety and Compliance Systems

"Kakadu's climatic and environmental conditions can make walking difficult." While that is true, it was written by someone with limited experience in long distance walking in Kakadu. I stand by my dry season description of Kakadu as the "world's most comfortable wilderness."

The document suggests a bushwalker induction program which "may include a 'checklist' of cultural, environmental and safety information that the applicant indicates and demonstrates that they have read prior to the application for an overnight bushwalking permit is processed." Willis's Walkabouts already does this. All our clients must sign a statement saying that they have read our *Bushwalking Guide* prior to the commencement of their trip.

"Operators and their staff should be required to visit the park and undertake training to learn about country, appropriate conduct in relation to cultural sites and objects, etc." There is no problem with the operator doing this, but I am very worried about the practicalities of this for guides. All my guides do at least one training walk before leading a trip. All guides complete the Kakadu tour guide course. Adding one extra requirement, if it cannot be scheduled at the guide's convenience, could mean the difference between a small business like mine continuing or folding.

Action 6 includes "an in-park training program for commercial operators and guides." – As above, it would be no problem for me to attend such a training program but, as above, this could put me out of business. A new or current guide might come up for one particular trip after they have done their training trip (which does not need to be in Kakadu if it was in an area with a similar environment). If they could do the induction just before their trip, it could work. If they had to be available for a particular course at a particular time, it would not. One way works for a small business like mine that depends on interstate guides. The other works far better for Park Management and traditional owners.

The rest of this section seems OK to me.

5.1.7 Strategy 7: Develop and Implement a Monitoring and Research Program

It sounds good in principle, but financial constraints could limit it in practice. To be effective, park management will need to work out how to use outside volunteer help when and where it is practical to do so.

5.1.8 Strategy 8: Maintenance, Resources and Funding

Again it sounds good in principle. Political decisions often mean that funding is given for a project with little or no consideration being given to the maintenance that will be required in future. Putting in a facility without budgeting for proper maintenance is, in my opinion, worse than not putting it in at all because of the inevitable negative feedback that will begin a few years down the track.

This section talks about the use of volunteers to assist. It is all well and good to talk about that, but things need to happen. I will quote from section 5.3 in my submission to the Kakadu Draft Plan of Management. "Another example which to me appears to be a failure to think outside the box came a year or two ago when I offered to bring a group in to help clear and re-mark a walking track. I was told that that wouldn't be a good idea as it would take employment from local Bininj. From an outside perspective, that seemed to be saying that the park had nothing else that those people could do." For outside volunteers to make any sort of positive impact, park management needs to be able to use them for what they can do when they are available.

5.1.9 Strategy 9: Build Supportive Partnerships

Again, I like the idea, but am not sure how it will translate to practice. In particular, I like, "Action 4. Strengthen relationships with the Darwin Bushwalking Club and tourism operators to gain assistance with environmental monitoring of bushwalking routes and to act as 'eyes and ears' in the more remote parts of the park."

We are the ones on the ground who can do basic monitoring at no cost to the park. Not using bushwalkers to monitor bushwalking routes is an admission of defeat before you begin.

5.2. Goal 2. Enhance Walking Experiences

5.2.1 Strategy 1: Upgrade the 'Must Do' Walking Experiences

The basic idea is a good one. Given the list, the implementation could be a disaster unless the information about the length and level of difficulty is emphasised in any promotional literature. A few comments on specific walks.

- **Bardedjilidji Walk.** I did this with a friend who had a bad hip in early December. The walk was relatively easy and allowed her to experience some of the best sandstone country in the park. Great choice.
- Manngarre Rainforest Walk. I don't understand why this walk didn't make the list. While I have not done this walk for a number of years. Once upon a time it would have been one of my top choices as it was the best walk with which to experience a bit of the Kakadu rainforest.
- Jim Jim Falls walk. Before beginning, people need to know that the last bit is relatively difficult, that they can stop for a view well before this, that swimming is not possible until near the end of the walk.
- **Gubara Pools.** With the sighting of a crocodile in the pools early this year, the pools were closed to swimming. Without the possibility of a swim at the end, I would drop this walk out of the must do list.
- **Barrk Marlam Walk.** This is a relatively difficult walk. That needs to be stressed. I have seen groups trying to follow the track back in the dark as they hadn't allowed for enough time. Marking needs a major upgrade. **Unless changes are made, this should not be a 'must-do' walk.** See my detailed comment on attachment 9.
- **Twin Falls Plateau.** Jim Jim has the name. Twin Falls has the better view. It also has a good viewing area part way along the track. While one section can be difficult to follow, overall it is easier than the Barrk Marlam walk. This would be my first choice for an upgrade. Refer also to my comment on attachment 9.
- **Motorcar Falls.** This is THE walk to do in the wet season and early Dry. The reward at the end is wonderful. But, once other areas open and the falls begin to dry out, it is less attractive. It's a relatively long woodland walk without many points of interest. Refer also to my comment on attachment 9 about the extension to Kurrundie Falls.
- **Barrk Walk.** I took a private group out to the park and did the walk in January. Another group from the Darwin Bushwalking Club did the walk in February. We would all agree that it is a great walk. We would also agree that it is difficult to follow in places and that it is a relatively difficult walk. By the end of the season, just before it is closed due to extreme temperatures, it is far more difficult and less rewarding. This is a walk suited only to a small number of people. If this is not emphasised, more people will get into trouble trying to do it. Refer also to my comment on attachment 9.

5.2.2 Strategy 2: Elevate Kakadu's Best Bushwalks

It would be good if the tables on pages 96 and 97 could be updated to reflect the two years since this draft was prepared.

Page 99 is where the damage is done. "During the last round of consultation, traditional owners indicated that they do not want bushwalking to occur in the Mount Brockman area beyond the Gubara Pools day walk, until cultural heritage assessments are carried out and the cultural significance of sites can be properly determined. Overnight bushwalking permits will not be issued for this area in the near future, while cultural assessments are taking place."

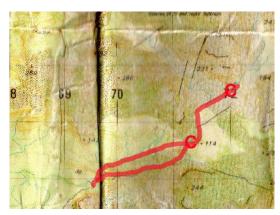
The fact that cultural assessments may need to take place is a damning indictment of past practice. I found a major camp set up by some researchers who had flown in by helicopter more than ten years ago. Where are the results of that research? George Chaloupka had walked in that country accompanied by senior traditional owners for many years. The famous speared emu painting is in that area. Where are the results of his research?

The area above Gubara is one of only two areas reasonably accessible for bushwalking during the wet season. (The other being Yurmikmik/Motorcar). In the last year for which figures are available, more than a quarter of the total number of permits issued were for Gubara, more than the next two most popular areas combined. Given the amount of research that has already been done, I do not think any closure is justified. But, if some closure is necessary, closing it in its entirety is not. Doing that will produce some incredibly bad publicity for the park, a '**Kakadon't**' message shouted to all the world. I am very disheartened to see that the compromise recommendation I made in my February 2013 submission about the Draft which was given to the Walking Strategy Committee was ignored. I repeat that submission here.

"This is a major problem for Willis's Walkabouts as it kills a major part of our wet season program. It's an area I love and hope to see re-opened to some extent in future. Having said that, while it would not do much for Willis's Walkabouts, I think there is probably a better answer that would avoid some unnecessary bad publicity for Kakadu.

The area above Gubara is currently one of only two areas which are easily accessible to bushwalkers during the Wet. The other at Yurmikmik is more likely to be closed due to road conditions than Brockman above Gubara. Closing the most accessible area will put more pressure on Yurmikmik.

It would be worth checking how many of the Brockman permits were for only one night and how many for two nights. All of the art sites of which I am aware need at least two nights to visit – one to get to a base camp, one to get further up into the basin where the art sites are, and the final day to get back. Allowing people a single night



(or maybe two with a limit as to how far they could go upstream), which, I suspect is what many ask for, would still leave people somewhere safe they could go and camp next to a pool in the Wet.

If people were told that the rest of the area had to be closed, at least temporarily, because of sites of significance, they would be much more likely to accept the need for the closure than if an area which contained little or nothing of particular significance were allowed to remain open. There is, of course, the possibility that there is some site of significance of which I am unaware, but if nothing is known, I would strongly urge that the one night option be left open. The route shown on the map at right does not go near any significant site of which I am aware.

If that is the case, leaving a one night walk as shown open would lead to much less of a **'Kakadon't'** feeling than closing everything. There are good campsites at the places marked C. (Because of the overlap with the route line, the Cs look a bit like circles.) There a number of other campsites suitable for very small groups elsewhere on the route shown."

Leaving that small section open would do next to nothing for my business but it would go a long way toward overcoming the inevitable negative message that closing the area will produce.

On page 100, the document suggests that the Jim Jim to Twin Falls (4-5 day route) be considered as a potential 'Kakadu bushwalk'. It also notes the reasons why many local bushwalkers don't think that it should. To those I will add another. The route is a one way walk. Unless local transport becomes available, any group doing the walk will have a long, boring walk along a 4WD track at the beginning or end of their walk. That inevitably negative message is not what the park wants to promote. The same is true for almost all the potential routes.

The report talks about ground-truthing, which is very important. It doesn't talk about the cost involved. Unless outside assistance is sought, it will cost a lot of money, money the park doesn't have. Why not send one or two people along on one of our trips to map out the route and/or look for better options.

"Action 1. Cultural heritage assessments be undertaken in the Mount Brockman area beyond the Gubara Pools day walk to determine the cultural significance prior to any further decision making about bushwalking in the area."

I would also note that I have had a standing offer to take park staff and/or traditional owners along on any of my trips at no charge. This offer has been there for at least 20 years but it has never been taken up for more than one or two nights at a time. It would provide the least expensive way for one or more of the traditional owners to come and see what is along the walking routes.

As stated above, where are the records of what has been done before? What will be done to ensure that any new data doesn't get "lost" as well? Unless some modification can be made, the 'Kakadon't' message that will be broadcast will reverberate for many years to come.

"Action 2. Undertake an assessment process (ground-truthing) to determine the feasibility of the Jim Jim to Twin Falls route (shorter option) to become the first 'Kakadu bushwalk'.

As stated above, given the cost involved, if Park Management and traditional owners want this done in a reasonable time frame, they will need to call on outside help.

Actions 3 & 4 are longer term and seem reasonable but will depend in part on what happens with Actions 1 & 2. If Park Management wishes to do this with minimal cost, the best way to do it would be to send one or more people along on one of our trips.

5.2.3 Strategy 3 Improve Visitor Information

Generally seems reasonable. I would note that the park websites have improved somewhat in this respect since the draft was prepared.

5.2.4 Strategy 4 Upgrade Access to Walking Opportunities

The first section is a good statement of the situation as it is, and suggests some of the possible ways things could be improved. As always, funding is a limiting factor.

"Action 1. Consider the options to improve access the shuttle service to Garnamarr being the easiest to implement."

I think that the introduction of such a shuttle should be a prerequisite for promoting the Jim Jim to Twin Falls route as a 'Kakadu bushwalk'.

"Action 2. Consider the potential for 'heli-walking' during the wet season to allow drop-off and pick up of walkers along with approved food drops for extended walks."

One concern about helicopter use was "noise and visual intrusion for remote country walkers" (note the typo on p 109, 'county' instead of 'country'. I would note that at present there is almost no one to disturb due to the difficulty of access. I would also note that the Darwin Bushwalking Club used helicopters for wet season access beginning in 1982 and Willis's Walkabouts used them from 1987 or 1988 until they were banned. The numbers, at least in the early stages, are likely to be minimal.

From the point of view of a 30 year veteran in the tour industry who has always promoted wet season bushwalking, this is the best new item in the report.

5.2.5 Strategy 5: Prepare a Thematic Interpretation Plan for Kakadu National Park

This all seems reasonable to me. Again, finances are a limiting factor.

5.2.6 Strategy 6: Develop a Marketing Strategy for Kakadu Walk Experiences

The implementation of the current strategy will allow for focussed marketing and promotion of the walking experiences, in particular the 'must-do short-day walks and the Kakadu bushwalks."

The Kakadu Bushwalks concept is a longer term one. Until the first one is ready to be trialed, a process which could take some years, I believe that the short term focus should be entirely on the shorter walks.

" developing links to external sites, such as the web-pages of bushwalking guiding companies and equipment suppliers."

This has already been done with a number of tour operators, Willis's Walkabouts being one. We have more than ten links to different park pages. Some of the material on our website is not specific to our tours so park links to those pages would be an efficient way to get some important messages across at next to no cost.

Everything else in this section seems reasonable to me.

5.3 Goal 3: Investigate New Walking Opportunities

5.3.1 Strategy 1: Investigate the New Short-Day Walking Opportunities

It all seems reasonable. But, as with everything, money is going to be a huge problem with doing anything new. I am in the process of assessing the viability of a 6-7 day trip based on day walks and would be happy to assist in scouting out potential new walks as described. If it would help, I could mark what I think was a practical route, then someone could assess it to see if it was culturally acceptable.

5.3.2 Strategy 2: Assessing the potential for an Iconic Bushwalk Experience

While the idea is worth considering, given the wishes of the traditional owners not to have new infrastructure built in the bush, it has limited potential with respect to the probable cost.

5.4 Goal 4: Deliver Potential Enterprise Opportunities and Benefits

5.4.1 Strategy 1: Investigate Opportunities for Traditional Owner Enterprises Associated with Walking Experiences

Among the proposals are, "greater involvement in the seasonal ranger interpretation program."

This document is now two years old. To some extent, this is already happening. It seems to be working well.

"New walking-based tourism opportunities could include"

• "transport services for walkers, to facilitate pick-up and drop offs"

There is not a huge demand, but there is a demand. I often get requests. At present, the only option is to book seats on a tour to and from but get off or on at some point on the tour.

• "Indigenous guide tours on the 'must-do' short day walks"

Given the enthusiasm my clients have displayed on the short walk with Violet Lawson on one of the short walks, this is one of the best ideas in this section. It's also one of the least expensive to implement.

• "access by helicopters to stone country tracks and routes during the wet season or to allow for food drops on longer bushwalks"

I once used helicopters and have been given permission (if the road remains closed) to use a helicopter food drop in May this year. Particularly in the shoulder season, this could have a dramatic effect on bushwalking numbers. Numbers during the Wet will remain relatively low as it is considered too difficult or too different for most bush walkers.

"Action 1. Support new opportunities for Bininj/Mungguy involvement in the development and operation of walking-based business within the park, including guiding short-day walks, with the possibility of being a 'guest guide' on overnight bushwalks (e.g. joining the group for a day from an accessible point on the route)."

Guiding short-day walks should be relatively easy but it should be noted that there are relatively few places where this would be possible for an indigenous guide to join a longer walk for a day and, at most of the places where it is possible, it would involve the indigenous guide leaving the group and walking back to the start on his or her own.

"Action 2. Support training programs for Indigenous guides and the development of a pool of skilled guides to assist with the delivery of walking experiences within the Park."

I would like to note I have offered trainee places on my trips for the past 20 years. I have yet to have anyone take up the offer.

Section 6 Implementation

6.1 10 Year Action Plan 2013-22

Given the delay in getting the draft released, the dates should be changed to 2015-2024 or perhaps 2016-2025.

I agree with most of what is in this section, but financing some of the suggestions will be an even bigger problem then is acknowledged here. For that and a few other reasons based on what I see as practical, I would like to suggest a few changes. Unless mentioned below, I have no issue with anything in this section. I would also like to note that a few of the suggestions, especially with regard to signage, are already underway.

Goal 1. To Improve Planning and Management Systems for Walking Experiences Within Kakadu National Park

Strategy 5, Action 3 "Undertake trials and monitoring on selected bushwalking routes to determine sustainable walker numbers." Given the financial constraints the park faces, I think it is imperative that bushwalking tour operators and any organisation which visits areas on a regular basis be involved.

Strategy 5, Action 4. "Consider developing a custom online platform for the new bushwalking permit system." This will not be easy. Unless maps of the approved routes become readily available, it will be next to impossible.

Strategy 5, Action 5 & 6. Fees. Introducing some fees for overnight bushwalking and for permits which get approved would go a long way toward overcoming the current situation where a group may make several bookings in the hope that they get one of them, then not use the others, effectively locking other walkers out. Given the costs associated with running the current system, I think most bushwalkers would find this reasonable – provided the fees are not too large. The \$5 per person per night I currently pay, the same as the Jatbula Trail in Nitmiluk seems reasonable.

Strategy 6, Action 8. "Require all overnight bushwalking parties to carry a personal locator beacon (PLB) and/or satellite phone, as a condition of the bushwalking permit." This was listed as a moderate priority. I think it should go to high.

Strategy 8, Action 6. "Implement a monthly program of track maintenance tasks for the 'must do' short and day walks, and integrate into district operational plans." If these walks are going to be promoted, this is absolutely essential or people will leave disappointed and the message will spread.

Strategy 10. Build Supportive Partnerships. "I think everything in this section is good.

Action 2. Consider the establishment of a working group to focus specifically on the development and management of walking opportunities in the Park." If this is done, I'd like to be in the group.

Action 3. "Establish a 'Friends of Kakadu Group'...." This is given a low priority. Given the problems with funding. I think this should be listed as a high priority.

Goal 2. Enhance the Visitor Walking Experience

Strategy 1. Upgrade the 'Must Do' Walking Experiences

Fine, as is.

Strategy 2. Elevate Kakadu's Best Bushwalks

Action 1. "Undertake a cultural heritage assessment in the Mount Brockman area beyond Gubara Pools day walk, to determine the cultural significance prior to any further decision-making about the area."

To the best of my knowledge this has been done. Where are the results of George Chaloupka's work? Ivan Haskovec was employed by Kakadu as the Park Archaeologist for a number of years. He made many trips to all the areas of the park with the senior traditional owners. Where are the results of his work? Where are the details of the consultations undertaken by Campbell Clarke in the preparation of the 1996 Walking Strategy?

These people consulted with and/or were accompanied by the most senior traditional owners at the time. Many of those people are now deceased. Has all the knowledge that was gained now been lost?

As mentioned earlier in this document, I have had a standing offer to take park staff and/or traditional owners along on any of my trips at no charge. This offer has been there for at least 20 years but it has never been taken up for more than one or two nights at a time. It would provide the least expensive way for one or more of the traditional owners to come and see what is along the walking routes. Two traditional owners did accompany one of my trips in the Koolpin area in 2003. They seemed happy with what we were doing when we visited the art sites there.

If one or two of the traditional owners of the area above Gubara Pools wanted to accompany one of my trips and se what happens, I could pay them on the same terms I paid the Jawoyn people on the 2003 trip. This would, however, have to be organised well in advance.

Actions 2-4 refer to 'ground-truthing'. Given the financial constraints the Park is facing, if Park Management seriously wants this to happen, the most economically viable way is to send one or more people along on one or more of the Willis's Walkabouts walks.

Strategy 3. Improve Visitor Information

I would be happy to assist in any way possible.

Strategy 4. Upgrade Access to Walking Opportunities

If Mount Brockman upstream of Gubara Pools is closed to bushwalkers, this should go to high priority. Offering something new in exchange for something that is lost would do at least a little bit toward mitigating the negative publicity resulting from the closure.

I am reasonably happy with the rest of what is listed under Goal 2.

Goal 3. Identify New Walking Opportunities

I am happy with the contents of this section.

Goal 4. Deliver Potential Enterprise Opportunities and Benefits

This is OK as it stands but I would like to note that if the local Bininj/Mungguy are not interested in a particular enterprise (as seems to be the case with regard to acting as guides on multi-day hikes), that should not preclude it taking place.

6.2 Start-Up Actions

Other than number 12, I have no issue with anything in this section but budgetary constraints will prevent some of them being implemented n the short term. As for the cultural assessment mentioned in number 12, all I can do is repeat my question about what happened to the results of all the previous work which was done.

Attachment 1. Consultation List

There was one particularly glaring omission from this list – Campbell Clarke, the author of the 1996 Walking Strategy. Had Mr Clarke been contacted, he would have been able to give some details of who had been consulted at the time. If that information really has been lost, it is a damning indictment of the Park Management team which allowed that to happen. If that information is reasonably accessible, someone should have ensured that it went to the authors of this report.

While I had not been in contact with Mr Clarke for many years, a Google search for his name found him and we were talking within two days of my initial search. Mr Clarke now works for the Wet Tropics Management Authority in Cairns and can be contacted through them.

Mr Clarke undertook extensive consultations with the traditional owners at the time. The NLC was involved in setting up some or all of the group meetings. Among those who received a specific mention for their assistance are two members of the current Board of Management.

Attachment 2. Review of Main Policy Documents

While the 1996 'Management Strategy for Bushwalking' does get a mention, some of the important specifics do not. The following are from Appendix 6 to that report.

P4. "Baroalba Creek is within the traditional lands of the Mirrai people. An extensive number of well-known and publicised art sites are on the plateau." If these sites were well known then, why is another study needed now?

P4 &5 go on to discuss the attractions of the area to bushwalkers. I have been walking on the plateau since before that report was written. I have noticed no vandalism or deterioration beyond what might be expect over the course of 30+ years. Why should it be any different now?

P28. Recommendation. "That Gubara be considered as an area which could be used to accommodate those desiring an easy overnight camping experience." This has come to pass. The number one area for short walks is now recommended to be closed because the earlier information has been lost.

Attachments 3-8 are background information. I have nothing to add.

Attachment 9. Inventory of Existing Short-Day Walks

A copy of this would be a good planning tool for anyone considering a visit to Kakadu. I haven't found all this information in any one other place. Unfortunately, I believe that some of the suggestions there will act to discourage rather than encourage bushwalkers to come to the park.

- **Barrk Walk**. The suggestion to create a short loop is an excellent one as is the idea of bidirectional markers. However, when it mentions, "improve track marking by removing excess markers", I have to wonder what excess there is. When I did the walk in January this year, I didn't see anywhere I thought had too many markers.
- **Gubara Pools.** "Relocate the start of the track to the first car park to avoid the need for visitors to drive through the wet, muddy section." There is no 'need' for anyone to drive through if they do not wish to do so. In the drier times of the year, 4WD is not necessary. The walk is moderately long as it is. If swimming will no longer be permitted because of crocodile problems, and the walk is lengthened, I would definitely remove it from the list of must do walks. I think the track should stay as is.
- **Barrk Marlam Walk.** "Consideration is being given as to whether visitors will be permitted to cross the creek and whether it is appropriate to construct a short section of track to a lookout point to allow visitors to safely view down the gorge." There is no need for any track construction, besides which anything installed would almost certainly be washed away in peak floods. Anyone who does the walk will want to go and have a look over the top of the falls. The best viewpoint is on the far side. The only way to keep people from going there is to close the track.

One tour operator who regularly visits the top with groups on day walks told me that the current restrictions on crossing the creek mean that people try and push through the scrub over rough terrain to get a view. He felt that this was dangerous. He also feels that the walk is barely worth doing. 'Dangerous and barely worth doing

If people can't continue to easily walk to the top drop of the falls on the north side of the creek as they did in the past, this walk should come off the 'must-do' list. 'Dangerous and barely worth doing' – that is the feeling of some who try and follow the current restrictions. That is not the message that the must-do concept is trying to create. Promoting the walk without allowing this will give people a bad impression and will devalue the whole concept of 'must-do' walks.

• **Twin Falls Plateau Walk.** I agree that there is one section where the markings could be improved. The report suggests installing "standardised no access beyond this point without a permit signs." Every time I've been there in at least the last five years, I've found such signs so I'm not sure what is being talked about here.

- **Maguk Plunge Pool Walk.** "Install standardised no access beyond this point signage at the junction with the informal track to the top of the falls." I have seen many day tourists at the pools above the falls on almost every walk I've done upstream of that point. They love it. I have seen no sign of environmental degradation other then the actual formation of the track. This is insignificant compared to the damage and erosion caused by feral pigs elsewhere in the park. Closing this area will discourage more of the moderately adventurous visitors to the park and will, I believe, encourage the continued decline in visitor numbers.
- **Kurrundie Creek Falls.** 11 km. "This track is currently promoted as a day circuit." "The track is hot and exposed in places." It also expresses concern about "an informal track across the top of the escarpment between the two destinations." I think these statements show that the authors did not walk to the top of the falls and that they are confusing two different walks and combining them into one. I have done many overnight bushwalks above Motorcar Falls. I am unaware of any informal track between Motorcar and Kurrundie. I have seen no signs of day-walkers above the falls The country near the edge is very rough so I'd be very surprised if there were.

Most of the visitors to Kurrundie do not do the loop which is substantially longer than 11 km. They continue along below the escarpment, have a swim and return the same way they came. The part beyond Motorcar Creek is no more hot and exposed than most of the track to Motorcar. Closing the loop to day-walkers without a permit might make sense, but closing the to and back track to Kurrundie will be yet another thing to discourage the moderately adventurous, one more way to spread the 'Kakadon't' message which is the last thing the park needs.

Where is the consistency? The Barrk, Barrk Marlam and Twin Falls Plateau Walk are all significantly more difficult than the Kurrundie Falls walk or the walk to the pools above the Maguk plunge pool. The Draft Strategy seeks to promote some of the harder walks while closing or restricting easier ones.

Attachment 10. Information. No comment.