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Australian Association of Consulting Archaeologists Inc.
Box 196
585 Little Collins Street
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Re: Formal complaint regarding registered Archaeologist, Robert (Ben) Gunn.

To Whom It May Concern,

The Australian Climbing Association Victoria (ACAV) would like to make a formal complaint regarding the conduct of a registered Archaeologist, Robert (Ben) Gunn.

The basis for this complaint is that we believe Mr Gunn's conduct has breached the [AACAI Code of Ethics](#) in several instances, including inciting racial conflict between Traditional Owners and rock climbers in Victoria. We provide details below of these instances found in a paper published in the Rock Art Research Journal, volume 37, titled "Rock Art and Rock Climbing an Escalating Conflict". The journal is produced by the Australian Rock Art Research Association, of which Ben Gunn is listed as a founding member. We believe the standard of work expected of registered archaeologists applies equally to published papers as to reports delivered under contract. We believe that Mr Gunn has breached professional standards in published work, based on Code of Ethics articles 2.1, 5.7, 7.1 and 8.1. The evidence and consequence of this are detailed below.

● **DUTY TO THE PUBLIC**

2.1 A member should take a responsible attitude to the archaeological resource base and to the best of her/his understanding ensure that this, as well as information derived from it, are used wisely and in the best interest of the public.

Mr Gunn is currently contracted for several important cultural heritage surveys in Victoria with significant public interest, in the Grampians National Park and Arapiles/Tooan State Park. The Grampians and Arapiles parks have a national and international reputation for recreational rock climbing and attract significant tourism to the region (estimated at 20,000 visitors per year) as well as permanent residents. Grampians land managers have not previously enforced climbing restrictions, but large-scale bans on recreational and guided rock-climbing have been enforced in the past 12 months following damage discovered to cultural heritage sites over the past several years. Parks Victoria have allocated up to \$1.2 million for cultural heritage surveys in the Grampians, which is on-going, as well as surveys at nearby Arapiles. Given the importance of these surveys for Traditional Owner groups, local residents, and Parks users from Victoria, interstate and internationally, there is a clear duty to the public for any archaeological advice or assessment provided to be professional and objective. Against this backdrop

of important cultural heritage assessments with significant public interest, Mr Gunn has published a paper which includes clear bias against one Parks user group, rock climbers, and calls into question his ability to provide objective and professional advice to Parks Victoria. This is evidenced through statements in the paper referring to climbers as “larrikins’ and “thrillseekers” (Gunn et al., p.91).

- **DUTY TO THE PROFESSION**

5.7 A member must state clearly the evidence on which the report is based, to what extent it is a matter of personal observation and the qualifications and experience of any co-workers quoted.

Article 5.7 of the Code of Ethics states that findings must be evidence-based. In discussing the widespread problem of graffiti in the Grampians region, the paper notes “Much of the graffiti in the Greater Gariwerd have not been produced by rock climbers; in other instances, particularly at Lil-Lil, it is all too apparent that rock climbers are at fault. Others elsewhere have been racially offensive or, through the production of pseudo-rock art, deprecating to Aboriginal people and the majority of non-Aboriginal Australians” (Gunn et al., p.90). No reasoning or evidence is given for why rock climbers, of all user groups, would be responsible for this graffiti. This incident occurred at a publicly accessible cave in a State reserve visited by large numbers of people for many years. Lil Lil is heavily trafficked by walkers, tourists, locals from the nearby town of Horsham (population 16,500) and indeed any member of the public. It is not a remote area, and it is possible to drive within 100 metres of the cliff. With no evidence of which user group perpetuated the damage, singling out climbers, as well as blaming this group for racially offensive graffiti elsewhere, without providing any evidence to substantiate these claims is not up to the professional standard required of a consultant archaeologist. If an individual were named this would be libellous, defamatory and open to legal challenge.

- **MATTERS OF FACT**

7.1 The consultant’s findings, recommendations, etc., shall be based upon professional knowledge and opinion and should avoid exaggerated and ill-founded statements. Article 7.1 of the Code of Ethics points to the need to rely on professional knowledge and avoid exaggeration.

- **MATTERS OF OPINION**

8.1 A member shall not knowingly misrepresent the needs, problems or possible consequences of a project.

We suggest that the general framing of the published paper seriously misrepresents the needs, problems and possible consequences of issues identified as damaging cultural heritage. As detailed above, Mr Gunn has identified rock climbers as the cause of harm to cultural heritage in instances when there is no evidence. An extensive expanse of rock climbing has been banned at established climbing sites in the Grampians (approximately 50% of rope climbing and 70% of bouldering). The objective of the paper published by Mr Gunn is described as “Reviews of the reasons for the closure are presented while adding a caution to all cultural site managers to regularly and carefully monitor their cultural sites for an increase in damaging activities resulting from climbers” (Gunn et al., p.82). Given many of the claims in the paper are based on unfounded or exaggerated claims relating to the damage to cultural heritage caused by rock climbers, there is a real risk that in misidentifying the cause of the problem, then

adequate steps have not been taken to address issues that could harm cultural heritage in the Grampians, including graffiti, vegetation tramping, campfires and littering, all of which can be caused by a variety of user groups.

We believe the decisions of land managers should be based on objective and factually correct advice that conforms to the relevant professional standards and we do not believe the work from Mr Gunn meets these standards.

The outcomes we seek are:

1. To retract the accusation that climbers were responsible for Lil Lil graffiti as there has been no evidence provided to support his claims;
2. To amend the title "*Rock Art and Rock Climbing an Escalating Conflict*" in the Rock Art Research Journal, volume 37. It is extremely unprofessional to start with a title of this nature in an academic publication;
3. For Mr Gunn to acknowledge his in-discretions, clarify these matters publicly and apologise for his conflict-inducing behaviour;
4. For Mr Gunn to be removed from all future climbing-related archaeological contracts; and
5. A review of Mr Gunn's registration with AACAI as a consultant to be conducted.

In the first instance we would be grateful if you could provide us with an acknowledgement of this complaint. Then at your earliest convenience, we look forward to your response to the serious issues that we have raised. We thank you in advance for your attention to this matter.

Yours sincerely,

Kuba Szczepanik

Committee Secretary
on behalf of the Australian Climbing Association (Vic) Inc.