

1 March 2022

To whom it may concern

ACT National Land (Lakes) Ordinance 2022 Exposure Draft – Submission by Invictus Dragon Boat Club

Invictus Dragon Boat Club are concerned that the updated Ordinance includes a new definition of dragon boating as well as dragon boating requirements. These definitions will have a detrimental impact on the sport of dragon boating in the ACT. Invictus Dragon Boat Club are also concerned at the lack of consultation with the sports governing bodies Dragon Boat ACT and the Australian Dragon Boat Federation.

Part 1, Division 3, 5 - Definitions

- The definitions for a power boat should be revised as it currently includes all boats.
- Remove 'carvel constructed' from the description of a dragon boat.
- Remove the minimum number of paddlers required as ten (10) and replace with one (1)

Part 1, Division 3, Clause 6 - Meaning of dragon boat operating requirements

This Clause ntroduces a requirement which was not in the previous regulation, that would prohibit the operation of a dragon boat on Lake Burley Griffin unless the dragon boat is within 200m of the shore.

If introduced, such a restriction (which does not appear to apply to any other users of the Lake) would:

- 1. Significantly impact on the several hundred members of Dragon Boat ACT (including Dragons Abreast) from participating in the sport in an effective and efficient manner.
- 2. Impact Club training sessions as we use large parts of the lake for training and longdistance racing.
- 3. Have an impact on DBACT regattas as parts of the racecourse are more than 200m from the shore. The current DBACT racecourse location is positioned at an appropriate distance from the shore to abide by water depth regulations for dragon boating and to ensure that there are similar conditions across all six (6) lanes for all competitors.
- 4. Be counter intuitive to the flow of traffic rules. Dragon boats are required to follow the direction of traffic around the lake during training sessions, ie. staying on the starboard side of the Lake. If the 200m limit was introduced, in order to comply with the traffic flow rule, dragon boaters would be required to paddle to Scrivener Dam (a distance of approximately 10 kilometres) in order to return to our base at Grevillea Park. This is not a feasible solution as it risks injury to paddlers. The only other option would be to remain on the same side of the lake, however that would mean travelling against the traffic which would create unnecessary hazards and undermines the purpose of the flow of traffic rules.

- 5. Impede the development of a sport which provides beneficial health and well-being outcomes to the ACT community, and which has seen significant success by ACT club and Territory representatives in both national and international competitions.
- 6. Have significant implications for the viability of the development of DBACT's permanent facility at Grevillea Park which is currently underway and has significant financial support from the ACT Government and the dragon boating community.

There is no safety rationale for requiring a dragon boat to be operated within 200m of shore. A dragon boat generally contains 11-20 people all of whom have safety and emergency drill training. There are no such restrictions applied to any other users of the Lake such as sailboards, paddleboats, rowing boats, kayaks, canoes and recreational boats.

We request that this sub-clause be removed from the Ordinance.

Heather Walsh

President

Invictus Dragon Boat Club

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