



Friday, 6 March 2020

RIS submissions  
Risk, Regulatory Planning and Policy  
Energy Safe Victoria  
PO Box 262  
Collins St West, Victoria 8007  
Email [REDACTED]

To whom it may concern,

**RE: Support for MAV submission to the *Electricity Safety (Electric Line Clearance) Regulations 2020*  
*Regulatory Impact Statement***

The Central Victorian Greenhouse Alliance, on behalf of its member councils, would like to express its support for the Municipal Association of Victoria's submission to the Electricity Safety (Electric Line Clearance) Regulations. The Central Victorian Greenhouse Alliance (CVGA) is a formal network of 13 regional and rural councils spread across northern and central Victoria including the cities and shires of Ararat, Ballarat, Buloke, Central Goldfields, Greater Bendigo, Loddon, Gannawarra, Hepburn, Macedon Ranges, Mildura, Mount Alexander, Pyrenees and Swan Hill. The CVGA has existed since 2000, working with its members on climate change projects, advocacy and information sharing.

As the MAV has expressed in its submission, we are concerned of the impact the regulations would have on the existing tree assets of councils across our region. We are already witnessing mass removal of structural branches and entire mature trees across the state. The urban forest and canopy cover that experts, governments and communities increasingly recognise as critical to mitigating impacts of climate change and improving health and liveability may become impossible to achieve.

We have noticed widespread concerns across our region (within the Powercor network) that severe tree prunings are affecting trees overall health, increasing mortality rates and ability to provide environmental services to the community (shade, cooling, amenity etc.).

We estimate that the public tree assets across our 13 councils is in the order of \$4 billion, including values of social and environmental benefits. This is very significant for rural and regional councils. Moreover, councils are investing significantly in new trees to address low percentages of canopy cover across our region. Ballarat for example has a target of 40% canopy cover by 2040, and will invest \$500,000 per year in a tree planting program.

The Central Victorian Greenhouse Alliance (CVGA) has led a number of projects over the past few years aimed at improving canopy cover and tree resilience in central and north west victoria, primarily from the impacts of climate change. Currently we are leading the *Cool It* project which is investing in street tree plantings in small shires to improve cooling in socio-economic vulnerable areas. This project also is building a database of tree species resilient to hotter and drier conditions.

A fundamental challenge to the delivery of these targets and goals of councils is how trees are managed and pruned to maximise their lifespan and values to the community. With the impacts of climate change likely to significantly increase mortality rates of the existing tree stock there is a need to reduce other stressors such as severe prunings.

Below are some of the examples of street tree prunings in our region due in part to shifts in 3 yearly pruning cycles as well as contractors acting to address legislative requirements:



Note in many photos, the canopy cover is severely reduced on the footpath/powerline side well, reducing any cooling benefit for most times of the day.

We support the MAV recommendations that call on the Government to:

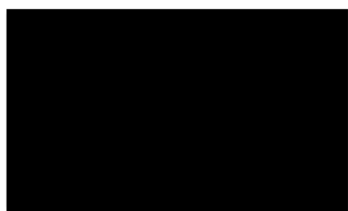
- Abandon the proposed change to make clause 3(1) of Code an infringeable offence or, alternatively, rework the provision so that infringements only apply to non-compliance in HBRA and to vegetation contacting HV in LBRA.
- Support inclusion of the changes outlined in section 5 of this submission. These changes will achieve improved amenity and environmental outcomes in low bushfire risk areas without compromising safety.
- Review Division 3 of the *Electricity Safety Act* as a matter of priority to provide for appropriate constitution of the ELCCC.

In parallel we would like to work with regulators and networks to assess the benefits of shifting to more regular pruning cycles rather than 3-4 years, which is requiring aggressive pruning regimes.

We would be happy to discuss these issues further.

Regards,

Yours sincerely



Executive Officer  
Central Victorian Greenhouse Alliance Inc.

