



Green Triangle Forest Products

6 March 2020

Proposed Electricity Safety (Electric Line Clearance) Regulations 2020

Submission from

Green Triangle Forest Products (PTC) Limited

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Green Triangle Forest Products Limited

As Trustee for World Timberfund Australia Trust
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About Green Triangle Forest Products

GTFP's plantations are part of an internationally significant regional estate located in the South East of South Australia and South Western Victoria in an area known as the Green Triangle. The region's plantation estate comprises of approximately 350,000 hectares. GTFP has approximately 22,000 net hectares of *Pinus radiata* with roundwood products sold mostly to domestic markets. Approximately 50% of GTFP's plantation estate is located in south west Victoria.

There are a number of powerlines that dissect the GTFP estate and GTFP is very mindful that contact between trees and electric powerlines can lead to fires, electrocutions and power supply interruptions. The consequences can include catastrophic loss of life and property, injuries and social disruption.

GTFP is very supportive of the regulatory framework for Electricity Safety and believe that it has been effective in reducing the risk of fires caused by vegetation contact with powerlines.

GTFP receives no income from having powerlines on our land and have little say over the location of the lines. In many cases these lines create significant and costly operational restrictions in the management of our land. Unlike a farming business, a plantation forest owner is unable to use its land in the vicinity of powerlines. The very existence of a powerline on the owner's land therefore costs the owner money on an ongoing basis. GTFP believes that the most appropriate organisations to manage the powerline safety risks are the electricity businesses.

Proposed Electricity Safety (Electric Line Clearance (ELC)) Regulations 2020

In relation to the proposed Regulations GTFP submits the following comments and recommendations to Energy Safe Victoria (ESV.) If there is any further information or clarification sought by ESV, please contact:

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Managing Director
GTFP Plantations
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Phone: ██████████
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Changes to the Regulations

- 1. GTFP supports the general change to the objectives of the regulation to protecting the health of trees and supports the implementation of Option 2 to remake the current Regulations but with targeted changes to improve the effectiveness and efficiency of the regulations.**

Despite the existence of the regulations over the years there have been numerous fires start as a result of trees falling into powerlines and coming into contact with powerlines by other means. Clearly the failure to clear trees has significantly increased the risk of starting a fire so this must continue to be managed well to avoid wildfire and critically important infrastructure.



2. GTFP urges ESV to strengthen its audit and inspection activities of these Regulations.

Policy Decisions – Timber Plantations

The Electricity Line Clearance Consultative Committee (ELCCC) explored the option of including specific requirements in the ELC Regulations addressing timber plantations. To do so, would potentially impose costs and affect the risk profile of plantation owners when they have little say over the location of the electricity asset and already absorb costs from having the asset on their land. It is critical that the responsibility for maintenance of electric line clearances be placed in the hands of a single party, to provide clear accountability for this vital activity. The only practical place where this responsibility can lie is in the hands of the powerline owners, as the party that benefits financially from the existence of the lines, and the party that has the capacity to recover the costs of their maintenance.

If tree owners were to share in the responsibility for powerline clearance, it would add extra costs and risk to landowners that are already bearing the cost of hosting another party's asset, but would also, to be equitable, require that all tree owners be charged with this responsibility, including owners of paddock trees, garden trees, windbreaks and native forests.

The Code of Forest Practices for Timber Production 2014, clause 4.3.3.3 causes some confusion about who is responsible for the removal of damaged or diseased plantation trees. Timber plantation owners / operators are not responsible persons under the Electricity Safety Act. ESV has identified this issue and should be supported in resolving this anomaly with the Department of Environment, Land, Water and Planning (DELWP.)

- 3. GTFP supports the decision to make no change to the current requirements in the regulations for timber plantations.**

- 4. GTFP urges ESV to work with the DELWP to amend the Code of Practice for Timber Production to ensure there is no confusion over responsibilities.**

Yours Sincerely

[Redacted signature]

[Redacted name]

GTFP

