

# Proposed Electricity Safety (Electric Line Clearance) Regulations 2020

Submission from



Hancock Victorian Plantations Pty Limited

ABN: 20 084 801 132

## Introducing Hancock Victorian Plantations

Hancock Victorian Plantations Pty Limited (HVP) is a commercial tree growing company with significant assets across regional Victoria. HVP manages 240,000 hectares of land in Victoria including 165,000 hectares of pine and eucalypt plantations. These plantations supply over 3 million tonnes of wood to rural and regionally based processing industries (sawmills, paper mills and panel plants) and to customers overseas. HVP directly employs 800 staff and contractors and the greater timber industry contributes over \$8 billion to the Victorian economy annually.

There are significant number of powerlines that dissect the HVP estate and HVP 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.

HVP is 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.

HVP 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. HVP 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 HVP 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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## Changes to the Regulations

- 1. HVP 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 there have been instances of significant non-compliance and failure to clear trees that presented a clear risk of starting a fire. The 2014 Jack River – Egans Road fire destroyed over 1,660 hectares of plantation and burnt through nearly 3,000 hectares of forest and agricultural land in the Yarram region. This fire was started from a self-sown tree growing beneath the powerline into the clearance space until it contacted the powerline.

- 2. HVP 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. HVP supports the decision to make no change to the current requirements in the regulations for timber plantations.**
- 4. HVP urges ESV to work with the DELWP to amend the Code of Practice for Timber Production to ensure there is no confusion over responsibilities.**