

Final Discussion Paper on possible amendments for the 10-year review of the *Electricity (Principles of Vegetation Clearance) Regulations 2010*



1. Introduction and overview

1.1 Purpose and objectives

The *Electricity (Principles of Vegetation Clearance) Regulations 2010* is the key legislation governing vegetation clearance near powerlines in South Australia.

The current Regulations expire on 1 September 2021 and SA Power Networks is consulting with stakeholders on potential amendments to the regulations that would maintain or improve safety outcomes whilst reducing the amount of tree trimming required and delivering improved visual amenity outcomes for the community.

Management of trees around powerlines is an ongoing challenge. While they are a welcome part of our community, many unsuitable trees have been planted under and close to powerlines, requiring ongoing trimming which is essential to manage community safety (from bushfires and electric shock) and reliability of supply.

With the regulations due for expiry, SA Power Networks is taking the opportunity to work with stakeholders to ensure the new Regulations achieve the best outcomes for electricity consumers and the community.

In identifying possible amendments to the Regulations, the following objectives have been considered:

- Ensuring the legislation enables efficient delivery of the tree trimming program
- Reducing our ongoing clearance costs over time
- Continuing to achieve public safety outcomes
- Ensuring that the clearance requirements reflect 'actual' risk rather than a 'one size fits all' approach
- Meeting community expectations for improved visual outcomes
- Reducing conflicts, where possible, with other legislation.

1.2 Legislative requirements

Section 55(1) of the *Electricity Act 1996 (SA)* imposes a duty on SA Power Networks to take 'reasonable steps' to:

- Keep vegetation of all kinds clear of public powerlines under its control, and
- Keep naturally occurring vegetation clear of all private powerlines under its control in accordance with the principles of vegetation clearance.

The principles of vegetation clearance are set out in the *Electricity (Principles of Vegetation Clearance) Regulations 2010* which provide a mandatory and prescriptive program for vegetation clearance in both bushfire and non-bushfire risk areas. These include:

- A cyclic cutting program of not more than three years, and

- Defined ‘clearance zones’, with clearance distances specified for use in making judgements on the extent and nature of cutting required.

The Principles of Vegetation Clearance were introduced in 1988 following the 1983 Ash Wednesday bushfires with a focus on bushfire risk mitigation. The clearance requirements were based on the need to create a defined distance between vegetation and electricity infrastructure, with differing requirements related to risk in bushfire risk areas and non-bushfire risk areas.

Under the Regulations, SA Power Networks is required to inspect and clear vegetation from around overhead powerlines, so that vegetation does not grow, regrow or bend into the ‘clearance zone’ (CZ) around the powerline, in winds that might reasonably be expected in the area, prior to the next scheduled inspection and clearance (maximum of three yearly cycles). The Regulations also prevent SA Power Networks from clearing vegetation beyond the applicable ‘buffer zone’ (BZ) for the powerline.

To ensure compliance and to manage risk, SA Power Networks undertakes tree trimming in bushfire risk areas each year and in non-bushfire areas (such as metropolitan Adelaide) on a three-year cycle.

1.3 Financial considerations and reducing clearance costs

Funding for tree trimming is a component of overall revenue approved by the Australian Energy Regulator (AER) in its regulatory determinations, with its most recent determination being for the period 1 July 2015 to 30 June 2020.

The funding provided is based on an assessment of the lowest efficient cost to meet regulatory and legislative obligations, such as vegetation clearance. SA Power Networks currently undertakes a program of vegetation clearance in bushfire and non-bushfire risk areas and this program is funded out of revenue approved by the AER to comply with the legislative requirements.

In the case of vegetation trimming the AER will approve the lowest efficient cost to meet the specific legislated clearance requirements. It does not approve additional costs, for example for additional cutting to improve visual outcomes. It is worth noting however that councils can enter into arrangements for SA Power Networks to undertake additional balancing pruning, but at their cost.

SA Power Networks is currently in the process of developing its Regulatory Proposal for the 2020-2025 period.

2. Current constraints

As outlined in the draft Discussion Paper (June 2018), there are a number of constraints in relation to our current pruning program.

- **Tree removal** – the current legislation has significant barriers to removing trees. Tree removal and replacement programs are critical to developing a sustainable least-cost vegetation management plan, which reduces the need for tree trimming over time and will also contribute to improved visual outcomes in some locations.
- **Visual amenity** - visual amenity of vegetation near powerlines is important to the community in general, and for local government and other landowners in both metropolitan and rural areas. SA Power Networks is seeking to balance, as best it can, the tensions between community expectations on visual amenity and ensuring full compliance with current clearance obligations.

- **Customer notification and information** - the current process for notifying customers about tree trimming can be problematic, particularly in rural and regional areas, as we cannot always identify who the owner/ occupier is and in some situations are unable to efficiently or effectively notify them of particular work that may impact them.
- **Operational delivery** – the current legislation creates issues at the operational level in delivering the program and meeting customer expectations.

3. Stakeholder engagement

SA Power Networks has been working closely with local government and key stakeholders over the past five years to understand their issues and identify strategies to improve vegetation management outcomes.

Our consultation has included:

- **Arborist Reference Group** - an independent Arborist Reference Group was established in 2014 to provide advice on a range of strategic initiatives aimed at improving amenity outcomes and vegetation management near powerlines. The Arborist Reference Group supports the need for regulatory change to balance community expectations with community safety. The group has been involved in identifying possible amendments as part of the 10-year review of the Regulations.
- **LGA Working Group** - a Working Group was established with the Local Government Association (LGA) and representative Councils in November 2013 to develop a long-term strategy for vegetation management and work more collaboratively with local councils. When the group was established, the need for regulatory amendments was identified as a priority action for the Working Group to progress.
- **Local Government Forum** – annual local government forums have been held since 2013 to bring councils together to discuss a range of vegetation management issues and opportunities. Two Local Government forums were held in March 2016 (metropolitan Adelaide and Clare) and long-term/ future considerations for legislative change was discussed. Whilst the need for the legislation to consider visual amenity was highlighted by both urban and rural Councils at these forums, all Councils queried how this could be effectively legislated.
- **Native Vegetation Council/ Department of Environment and Water (DEW)** - SA Power Networks has been working with the NVC and DEW on the development of a Standard Operating Procedure for native vegetation clearance, including tree removal. While we have been working with the NVC on an offset strategy that balances the protection of native vegetation of habitat value with the long-term interests of customers, we have been upfront about our desire to amend the regulations to facilitate the removal of ‘unsightly’ and ‘inappropriate’ trees without the need for offsets, as these make removal uneconomic. The payment of an offset for the removal of native vegetation, as well as the removal costs, is directly borne by electricity customers. Allowing the removal of ‘unsightly’ trees with minimal to low environmental value (without offsets) provides the most cost-effective solution for both SA Power Networks and the community.

Preliminary Discussion Paper – June 2018

A preliminary Discussion Paper was developed to outline the proposed amendments, including the rationale for seeking a change, and circulated to key stakeholders for feedback on our proposed amendments. An eight-week consultation period was provided.

A total of 24 submissions were received – from 19 Councils, four Government Agencies and one community group. While there was support overall for SA Power Networks seeking amendments to

improve vegetation clearance outcomes and reduce the clearance requirements, there were some issues raised regarding some specific potential amendments.

Following feedback on the discussion paper, the following two amendments are no longer being pursued by SA Power Networks:

- Planting over underground assets - extending Regulations for planting restrictions over underground assets (33kV, 11kV and less)
- Disposal of mulch – where appropriate to leave on site eg. non-visible areas, non-metro areas

Stakeholder Workshops – October 2018

A series of workshops to seek Council and stakeholder input on the proposed amendments were held across the state as follows:

- **Adelaide** - Thursday 11 October 2018, 10.00-1.00pm
- **Burra, Mid North** - Wednesday 17 October 2018, 10.00-1.00pm
- **Whyalla, North** - Thursday 18 October 2018, 10.00-1.00pm
- **Wudinna, Eyre Peninsula** - Friday 19 October, 10.00-1.00pm
- **Penola, South East** - Tuesday 23 October 2018, 10.00-1.00pm
- **Renmark, Riverland** - Thursday 25 October 2018, 10.00-1.00pm

Level of Comfort with proposed amendments

All respondents were asked to individually rate their level of comfort with the proposed amendments, both at the start of the workshop and again at the end of the workshop.

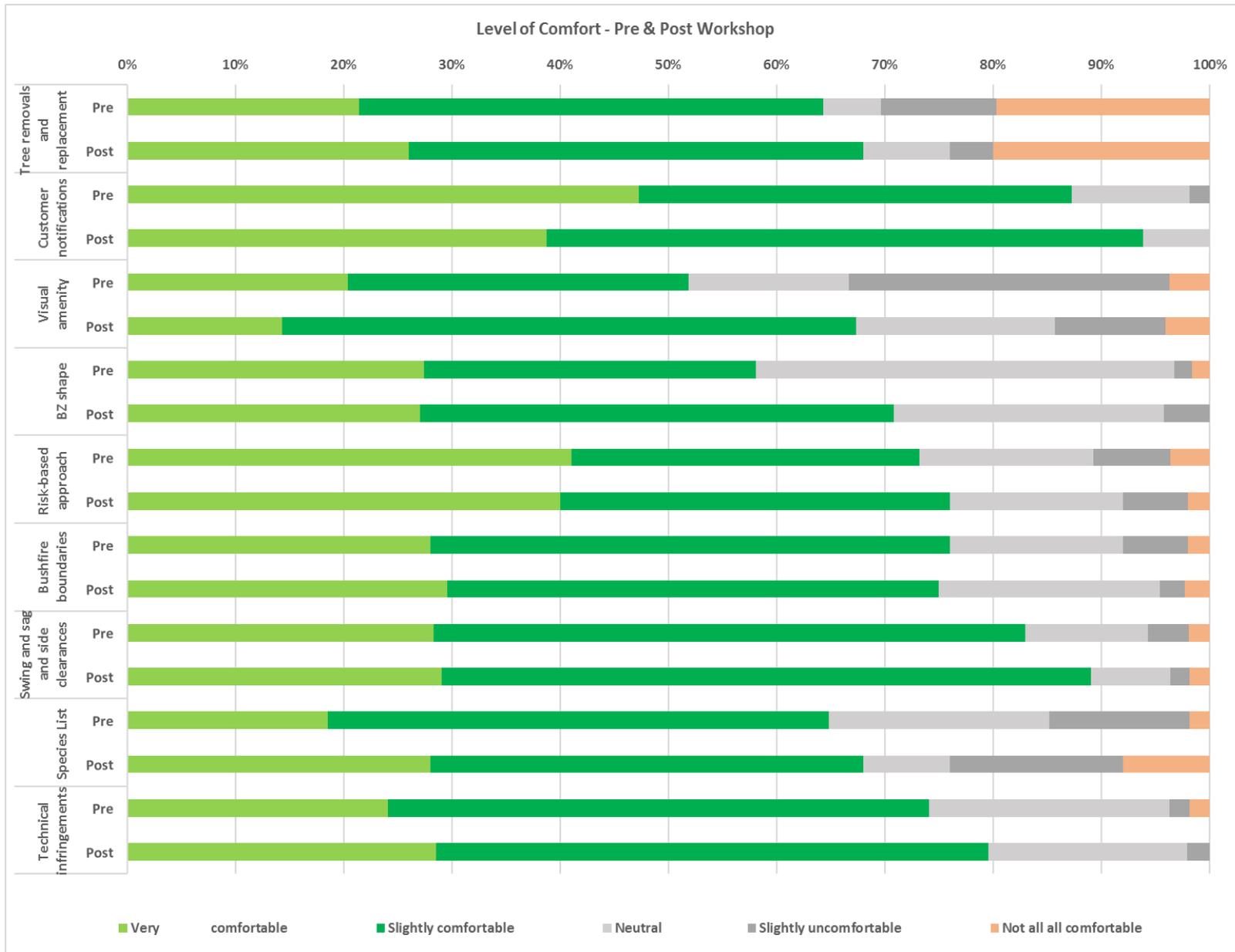
The figure below provides an overview of participants level of comfort with the different amendments.

Across all workshops, there was strong support for ensuring that the Regulations are shaped in a way that facilitates the best outcome possible for tree clearance around powerlines.

Stakeholders recognise that the Regulations are a key determinant of outcomes and that amendments will not only assist in reducing the number of trees pruned and the extent of pruning, but also in reducing costs to electricity consumers and improving visual outcomes.

Overall, workshop participants were comfortable with all of the proposed amendments. A number of participants were neutral on several of the proposed amendments, in particular the shape of the buffer zone, species list and technical infringements.

Tree removals and visual amenity were the two amendments participants were less comfortable with, however a majority of participants were comfortable with changes, particularly after the issues were discussed through the workshop process. While on average 30% of participants were not at all/ slightly uncomfortable with tree removals at the start of workshops, this had reduced to 24% at the end of the workshop. In terms of visual amenity, 32% were not at all/ slightly uncomfortable at the start but this number had reduced to 14% at the end of the workshops.



Summary of workshop feedback

Tree removals

Communication and consultation with Council is considered crucial to all tree removals in urban/ township areas and desirable in other areas subject to agreed parameters for removal. Councils and landowners have varied views and needs so a flexible approach to removing trees in urban areas is desired.

There was support for ongoing partnerships between SA Power Networks and Councils to tackle problem trees or remove/ replace inappropriate species. When identifying trees for removal, the need to look at trees that respond well to pruning and focus removals on trees that don't respond well was noted.

There was general support for the removal of trees that were considered a risk, unhealthy or had been pruned to a point that removal was the best option. A risk-based approach to removals was supported or where pruning was in conflict with the Australian Standard or amenity of the tree.

Prescribed area/ non-bushfire risk areas

Removals were not supported without consultation with Councils but there was support for the removal of street trees that create ongoing maintenance issues, trees that create infrastructure damage eg. kerbs, footpaths, meet shared SA Power Networks/ Council goals, inappropriate species and graduated replacement programs. Replacement with appropriate species was also seen as a key to successful removals in urban environments.

The current approach where SA Power Networks identifies potential trees for removal as part of the scoping data was supported, as well as the need for early communication and notification to ensure alignment with Council budget cycles.

Bushfire risk areas

Removal of trees was supported under the following circumstances:

- Public safety/ significant risks/ unhealthy.
- Trees that had passed their suitable useful life expectancy.
- Unsightly trees – removal supported vs ongoing 'butchering' of a tree.
- Weed tree and invasive species removal eg. Pepper trees, Aleppo pines.
- Legacy trees.
- Inappropriate trees.
- Align with Council Roadside Vegetation Management Plans.
- Other vegetation is present outside of the clearance zone.
- Trees over 20 years with an unbalanced form.

Several Councils felt there was a need for SA Power Networks to 'offset' tree removal, with SA Power Networks either developing a vegetation offset policy or ensuring appropriate regeneration and replanting. Many Councils however did not think SA Power Networks or the community should be paying offsets for the removal of native vegetation as part of a maintenance program. Several Councils also supported removals and replacement with grasses/ shrubs rather than ongoing powerline clearance.

Sapling removal

Overall there was support for the removal of saplings in the bushfire risk areas in rural and regional areas. There was some reservation regarding the removal of saplings without prior agreement and it was noted that specified buffer zones under/ near powerlines would ensure sapling removal is managed appropriately.

Greater clarity regarding what sapling removal will involve, including targeting self-seeded and naturally occurring vs planted, and regeneration and restoration was highlighted.

Other considerations

The need to consider a range of other factors, such as habitat value, landowner consultation and community expectations; Council approval requirements and lead in times for budgets; different Council expectations and requirements; urgency of work; mulching and contractor skill levels on plant identification were also raised.

Customer notification

There was support for a shift from the current paper based notification to a more customer friendly and simple notification system, in the form of an email or text (similar to P@MP). An opt in process for landowners was supported.

Whilst the owner/ occupier should be directly notified (text/ email) there was support for broader notification of areas/ districts. It was also felt that landowners should be given the option to not receive notifications. A move away from paper based notification was considered positive in terms of increasing the level of notification, from months in advance to within the next few days.

Some Council areas have network coverage issues and residents living in isolated areas so any new process needs to take into account how these landowners will be notified.

A range of other options to improve communication were suggested:

- Put flyer/ notice in Council rate notice
- Local newspaper adverts
- Social Media – Facebook, Twitter
- Council websites/ SAPN website
- Posters in the district eg. libraries, community notice board
- Local TV and radio
- Council Call Centres
- Photo and data sharing.

Councils felt Works Managers have a proactive role to play in notifying their Council Call Centre to advertise on social media or Council websites. It was also suggested that there is an opportunity to liaise with landowners regarding other work eg. to offset costs or remove trees.

Working with other stakeholders such as Councils for data sharing on who owns/ occupies land and GIS asset registers, and notifying DPTI when clearing along roadsides was also raised.

It was felt that SA Power Networks/ ATS currently notify and work well with Councils on upcoming clearance, including the identification of potential trees for removal. Several Councils supported earlier notification to ensure alignment with budget cycles, liaison within Council and Council approval (eg. removals, if required) particularly in relation to works vs cyclic clearance program.

Visual amenity

There was mixed response to the inclusion of AS 4373 (or best practice pruning) in the Regulations, with greater support in the metropolitan and large regional Council areas where the standard is more widely used. A number of Councils currently do not apply the standard when pruning trees in their area and some Councils felt it was too difficult to apply for powerline clearance.

The subjective nature of visual amenity was raised as well as the definition of amenity – visual eg. function/ form, environmental, health and longevity. Developing a Code of Practice for pruning was suggested as an alternative to including AS 4373 in the legislation in urban and township areas to reflect different tree types, different situations and different desired outcomes. The Code of Practice could be included in the ‘Protocol for Vegetation Management’.

The elements supported for inclusion were:

- Correct cuts eg. cut back to collars, growth points, not leaving stubs.
- Balancing a tree.
- Consideration of multi-stemmed leaders and structural faults.
- Pruning for minimal risk for tree failure.
- No lopping/ wine glassing – should be noted this was not consistent between workshops. with some supporting in certain circumstances.
- Consideration of environmental conditions eg. arid species less flexible.

In terms of improving the visual outcome of pruning, shaping trees where feasible and talking to Councils to avoid ‘butchering’ in high amenity areas and trees in townships. There was an understanding that not all trees could be cut to amenity standards but taking more care in visible areas would improve customer satisfaction and reduce complaints. Most Councils could identify areas where greater care could be taken and where they could agree on additional works. Whilst cost sharing arrangements can be complicated there was an awareness that having SA Power Networks contractors do additional works whilst undertaking powerline clearance was more cost effective for Councils than them separately engaging contractors.

The general feeling from Councils was that pruning should be undertaken in accordance with the Australian Standard “as far as reasonably practicable” to consider tree health, structure and overall shape.

Other considerations included:

- Different trees react differently to different pruning techniques.
- Partnerships with SA Power Networks and Council to meet different needs.
- Diagrams of cutting options with regard to trunk alignment in relation to the powerline/ tree as this influences the visual amenity outcome.
- Any focus on amenity should also consider canopy cover, foliage volume, habitat, community values and perceptions, heritage, health and wellbeing, and financial values.

A number of Councils also noted that while further improvements in amenity are supported, visual outcomes have improved over the last few years. This has been assisted by working with Councils prior to clearance in urban areas and townships.

Bushfire boundaries

Several areas were identified where a boundary review would benefit vegetation clearance and improve the aesthetic outcomes.

There was support for removing the bushfire boundary maps from the Regulations and having a clearly defined process for engagement, including consultation with Councils, relevant government agencies (Planning) and CFS, and the desire for boundary alignment between planning (Development Plans), CFS and vegetation clearance.

The need for the boundaries to be constantly reviewed to reflect changes and urban growth was highlighted. For example, a review is currently underway for Wudinna where the outskirts of town (Mt Wudinna Rd) and the town to the south of the highway are currently zoned bushfire risk vs non-bushfire risk.

Community education via media releases, websites and social media to advertise that zones are changing to improve clearance outcomes would also be beneficial to improve community awareness.

Risk-based approach

There was support for the risk-based approach that was in the legislative change process for the ten towns over 10,000 and further expanding the definition of risk-based pruning around LV powerlines to other towns and non-bushfire risk areas.

The following towns or regional centres were identified for consideration as part of the 10-year review by stakeholders:

- South East towns – Millicent, Penola, Naracoorte, Beachport
- Yorke Peninsula towns - Kadina, Moonta and Wallaroo
- Barossa towns – Angaston, Kapunda, Tanunda, Bethany, Nurioopta, Rowland Flat, Greenock
- Riverland towns – Berri, Barmera, Loxton, Renmark and Waikerie
- Mid North/ Central towns – Crystal Brook, Eudunda, Jamestown, Peterborough
- Areas with limited undergrowth material or sparse trees eg. Far North – Quorn

There were also areas that were considered but deemed inappropriate due to the risk. The question of whether the adoption of the risk-based approach increases risks was asked, for example, is there an increased risk of kids climbing trees.

The need for community education and awareness regarding the risk-based approach was identified across all workshops, with this being highlighted as fundamental to the rollout of risk-based pruning. It was felt the community needed to understand the different risks between bushfire and non-bushfire risk areas and that tree growth through low voltage lines is an acceptable risk in some areas.

Species List

The powerline friendly list of tree species was supported in general, particularly in the rural and regional areas where guidance on what was appropriate for planting under a powerline was welcomed.

The majority of participants felt the new list provided Councils with the flexibility they required but were happy to retain the larger OTR list as an appendix to increase choice. Councils also noted that planting 'the right tree' reduces constant maintenance and no-maintenance trees under powerlines should be a key driver in selection.

A few issues were raised in relation to the current list, including:

- Locations where trying to maintain consistency with existing street tree plantings. Like for like should be appropriate in certain circumstances eg. avenue plantings.
- In urban areas, species should be considered under LV lines that will temporarily breach clearance due to the nature of being a living entity but can be maintained thereafter.
- Lack of tall trees to provide canopy cover – larger trees should be supported but recognise acceptable level of maintenance by Council is required.

In terms of ongoing consultation, the need to work with the LGA and the nursery industry to update/ review the list every two years was noted. The list needs to be flexible and evolve over time.

Overall there was few concerns with not having the list embedded in the legislation as this allowed flexibility and species to be added as new species came on to the market or trials were undertaken. The main concern related to the flexibility to add species to the list rather than remove species and whether it will remove potential safeguards.

Technical Infringements

Feedback suggests a logic/ risk-based approach that considers risk is required to ensure the action undertaken is appropriate for the level of risk.

The age and maturity of the tree was considered a key factor in determining the risk, as well as prevailing winds. A young tree for example provides more opportunity for infringing into the clearance zone than an old, mature tree. Such an approach would not be suitable for senescent trees and actively growing trees.

4. Proposed amendments to the Regulations

The Principles of Vegetation Clearance were introduced in 1988 following the 1983 Ash Wednesday bushfires with a focus on bushfire risk mitigation. While this risk is still evident, there is scope to amend the regulations to meet community and stakeholder expectations while still achieving appropriate public safety outcomes.

Table: Summary of amendments to be sought as part of the 10-year review

<i>Proposed amendment</i>	<i>Description</i>	<i>Rationale for seeking change</i>	<i>What SAPN will be seeking in the Regulations</i>
Tree removals and replacement	<ul style="list-style-type: none"> ▪ Allow the removal of trees, including saplings (less than 5 years old) directly below the Clearance Zone 	<ul style="list-style-type: none"> ▪ Remove inappropriate trees under powerlines ▪ Reduce fuel load in bushfire risk areas ▪ Reduce ongoing clearance costs ▪ Meet community expectations regarding removal vs ongoing pruning ▪ Only State without provisions under legislation to remove trees 	<ul style="list-style-type: none"> • In the prescribed area and NBFRA, SA Power Networks may remove a tree with agreement by the relevant landowner. • In a BFRA, SA Power Networks may remove a tree directly under the clearance zone under certain parameters.
Customer notifications	<ul style="list-style-type: none"> ▪ Look at different forms of customer notifications ▪ Opt-in/opt-out approach for landowners 	<ul style="list-style-type: none"> ▪ Other forms of communication and better ways to notify ▪ Difficulties and costs associated with current notification process ▪ The term ‘written notice’ is not defined in the Act nor in the <i>Electricity (Principles of Vegetation Clearance) Regulations</i>. ▪ Facilitate future improvements to how program is delivered eg. technology ▪ Customer choice – opt in/ opt out ▪ Still provide landowners 30-day timeframe and right to object 	<ul style="list-style-type: none"> ▪ Amend the Regulations to note that written electronic notification in accordance with the <i>Electronic Communications Act 2010</i> constitutes ‘written notice’ for the purpose of Part 5 of the Electricity Act. ▪ This will involve a move to electronic forms of notification (ie. email, SMS), with an opt in approach for landowners.
Bushfire/ non-bushfire boundaries	<ul style="list-style-type: none"> ▪ Develop criteria for determining the bushfire and non-bushfire risk area boundaries 	<ul style="list-style-type: none"> ▪ Boundaries often don’t reflect risk ▪ Reflect urban development and growth ▪ Reduce clearance requirements 	<ul style="list-style-type: none"> ▪ Amend Regulations to remove the bushfire boundary maps from the regulations and define process for reviewing maps that requires: <ul style="list-style-type: none"> - Consultation with stakeholders eg. CFS - Alignment with Council Plan - Publicly available source eg. Location SA ▪ Amend Regulation to include an intermediate zone to allow a transition between the Bushfire and Non-bushfire risk areas.

Visual amenity	<ul style="list-style-type: none"> ▪ Unbalanced trees in legislation ▪ How address 'aesthetically pleasing clause' in current legislation? ▪ Can we include 1-2 elements of the Australian Standard? 	<ul style="list-style-type: none"> ▪ Meet community and Council expectations for improved visual outcome ▪ Improved tree health and amenity of streetscapes 	<ul style="list-style-type: none"> ▪ Amend the Regulations to state where practicable and in the best interests of the tree's health and structure, the tree should be cut in accordance with AS 4373.
Risk-based approach	<ul style="list-style-type: none"> ▪ Look at expanding the definition of low risk powerlines to other non-bushfire risk areas (regional centres or large rural townships) where specified criteria are met (towns with a fire station? Towns >5,000?) eg. Riverland towns – Loxton, Waikerie ▪ Develop criteria where risk low – fire consequence eg. Riverland 	<ul style="list-style-type: none"> ▪ Meet community expectations – improved amenity and streetscape value in townships ▪ Reflect risk ▪ Reduce clearance requirements ▪ Adoption of the risk-based approach in prescribed area in 2010 has reduced complaints and delivered amenity improvements 	<ul style="list-style-type: none"> ▪ Amend the Regulations to allow the risk-based approach to be applied for LV powerlines in the following towns subject to Council agreement and further analysis: <ul style="list-style-type: none"> - South East towns – Millicent, Penola, Naracoorte, Beachport - Yorke Peninsula towns - Kadina, Moonta and Wallaroo - Barossa towns – Angaston, Kapunda, Tanunda, Bethany, Nurioopta, Rowland Flat, Greenock - Riverland towns – Berri, Barmera, Loxton, Renmark and Waikerie - Mid North/ Central towns – Crystal Brook, Eudunda, Jamestown, Peterborough - Areas with limited undergrowth material or sparse trees eg. Far North – Quorn
Swing and sag	<ul style="list-style-type: none"> ▪ Clearance zone being based on swing and sag of conductor applied to all powerlines ▪ Parameters to reduce side clearance requirements 	<ul style="list-style-type: none"> ▪ Reflect risk ▪ Reduce excessive clearance eg. Remove step change in clearance between 49m vs 51m span ▪ Manage community expectations 	<ul style="list-style-type: none"> ▪ Amend the Regulations to permit the option of the clearance zone being based on swing and sag of conductor, plus a specified clearance distance. The Regulations should specify that the CZ be determined based on the ascertainable characteristics of the powerline and the maximum swing and sag taking into consideration the maximum swing and sag of the conductor for its operating conditions and winds that might reasonably be expected in the area plus the fixed attachment point clearance distance (ie. 0.5m for 11kV).

<p>Buffer Zone shape - only applies to BFRA</p>	<ul style="list-style-type: none"> ▪ Review the Buffer Zone shape/ clearance ▪ Allow pruning outside BZ for collar cuts and crown reductions ▪ Develop parameters around pruning outside of the BZ ie. when can/ can't cut 	<ul style="list-style-type: none"> ▪ Allow pruning outside of BZ to improve tree health and amenity 	<ul style="list-style-type: none"> ▪ Amend the regulations to state that cutting is allowed outside the Buffer Zone if in the best interests of the tree's health and structure eg. collar cuts.
<p>Tree List</p>	<ul style="list-style-type: none"> ▪ Tree list that allows for greater flexibility and addition over time – list too restrictive ▪ How communicate list to stakeholders? eg. OTR/ SAPN website 	<ul style="list-style-type: none"> ▪ Greater flexibility ▪ Allow addition of new species over time eg. new cultivars 	<ul style="list-style-type: none"> ▪ Regulations amended to state plant in accordance with Species List approved by OTR, in consultation with SAPN.
<p>Technical infringements</p>	<ul style="list-style-type: none"> ▪ Vegetation (eg. tree trunk) inside CZ but leaning away from powerlines ▪ No risk but can't cut to achieve required clearance – would have to remove tree ▪ Potential Bend & Grow's and cutting 'light leafy growth' that isn't a risk – regulations include something about distortion, risk-based? CZ around LV and private supply lines 	<ul style="list-style-type: none"> ▪ Risk-based approach ▪ Compliance currently can't be achieved ▪ Stimulates growth and future cutting requirements 	<ul style="list-style-type: none"> ▪ Allow cutting on a risk-based approach following risk assessment and documentation.

5. Summary and next steps

SA Power Networks believe that the proposed amendments would maintain or improve safety outcomes whilst reducing costs and delivering improved outcomes to the community.

We appreciate the strong participation of stakeholders, the support for our efforts to improve tree management outcomes around powerlines and the cooperative approach to finding balanced solutions that benefit the broader community.

This Final Discussion Paper, outlining the feedback from our engagement with stakeholders and our proposed amendments, is the final stage prior to formally lodging a submission with the Office of the Technical Regulator to commence the Parliamentary Process in March 2019.

SA Power Networks values your feedback as a key stakeholder and your input and feedback on this discussion paper will help ensure we improve how we manage vegetation near powerlines.

How to make a submission

Submissions on the final discussion paper can be made through SA Power Networks by emailing to:

- Alexandra Lewis, Vegetation Strategy Lead - alexandra.lewis@sapowernetworks.com.au

Hard copy submissions can be mailed to:

- Alexandra Lewis
Vegetation Strategy Lead
SA Power Networks
GPO Box 77
Adelaide SA 5001

Submissions should be submitted by Friday 25 January 2019.

If you have any queries please contact Alexandra Lewis on 8404 5433.