



5 Milner Street,  
Hindmarsh SA 5000

Phone: (08) 7127 4630

Fax: (08) 82319773

Website: [www.ncssa.asn.au](http://www.ncssa.asn.au)

Alexandra Lewis  
Vegetation Strategy Lead  
SA Power Networks  
GPO Box 77  
Adelaide SA 5001  
[alexandra.lewis@sapowernetworks.com.au](mailto:alexandra.lewis@sapowernetworks.com.au)

Friday 25 January 2019

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

Dear Ms Lewis,

The Nature Conservation Society of South Australia (NCSSA) appreciates the opportunity to comment on the final Discussion Paper on possible amendments for the 10-year review of the *Electricity (Principles of Vegetation Clearance) Regulations 2010*. We also appreciated the opportunity to participate in the workshop held in Adelaide on 11 October 2018. Since 1962, the NCSSA has been a strong advocate for the protection of native vegetation and biodiversity in South Australia with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities and management of protected areas.

We would like to take this opportunity to restate that we strongly object to SA Power Networks 'desire to amend the regulations to facilitate the removal of 'unsightly' and 'inappropriate' trees **without the need for offsets**' (page 3 of the Discussion Paper, emphasis added). At the workshop on 11 October 2018, there was general consensus that SA Power Networks should establish and maintain an appropriate offsets program (either directly by replanting or through payment to a fund) to compensate for the damage to nature and our wildlife resulting from the removal of native vegetation. The community expects this and indeed is subject to the same requirement if removing native vegetation for other reasons, such as farming or agricultural development.

The stated objection to providing offsets is economic, but it is interesting to note that SAPN received \$3.84 billion from the Australian Energy Regulator for the 2015-2020 period and currently makes annual profits in the hundreds of millions (e.g. \$134.7 million in the six months to June 30 2017). Therefore it seems reasonable to expect funds to be made available for tree trimming or delivering offsets for clearances.

We also note in relation to tree removal that, in many instances, tree trimming continues to be the most efficient, cost effective, and ecologically preferable strategy. Any 'permanent tree removal' would be more labour and cost intensive than trimming, and may be ineffective given many tree species continue to recruit and grow from cut stumps or the soil seedbank. Attempts to totally prevent tree recruitment would be destructive to native vegetation beneath powerlines and would reduce diversity and habitat values for fauna and flora (hollow-dependent animals etc.).

We are also concerned that about the terminology used to depict trees as problematic – “unsuitable, unsightly and inappropriate trees”. These are all subjective terms, and we note that many large trees (that some may consider “unsightly”) offer considerable habitat, genetic, and conservation values. For example, many large hollow-bearing Eucalypts remain only because they have twisted grains or were otherwise considered unsuitable for milled timber. Visual amenity is very much in the eye of the beholder.

In relation to consultation, in addition to peak bodies, consultation with private bush owner/manager groups that look after vegetation fragmented by powerlines (i.e. Friends of Private Bushland) should be sought, as they often directly deal with the on-ground consequences of tree trimming policies.

If you would like to clarify or discuss these points please contact me on (08) 7127 4633 or via email at [julia.peacock@ncssa.asn.au](mailto:julia.peacock@ncssa.asn.au).

Yours sincerely,

A handwritten signature in blue ink that reads "Julia Peacock". The signature is written in a cursive style with a flourish at the end.

Julia Peacock  
Nature Advocate

## NCSSA comments on ...

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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 (page 3 Final Discussion Paper on possible amendments for the 10-year review of the Electricity (Principles of Vegetation Clearance) Regulations 2010)

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 (page 6)