

Merri-bek Civic Centre

Woi-wurrung Country
90 Bell Street, Coburg 3058
T: (03) 9240 1111

Postal Address

Woi-wurrung Country
Locked Bag 10, Brunswick 3056

merri-bek.vic.gov.au



Merri-bek
City Council

Department of Energy, Environment and Climate Action (DEECA)

Attn: Electric Line Clearance Policy Team

Submitted via: Engage Victoria

RE: Submission on the Proposed Electricity Safety (Electric Line Clearance) Regulations 2026

Merri-bek City Council Officers welcome the opportunity to provide feedback on the Regulatory Impact Statement (RIS) and the draft *Electricity Safety (Electric Line Clearance) Regulations 2026*.

We manage a large and complex urban forest while meeting its obligations as a responsible person under the Electricity Safety Act. Vegetation management around powerlines is a significant operational and financial responsibility that requires careful balancing of community safety, urban canopy protection and community expectations.

We support the RIS objective to better balance safety, environmental outcomes and regulatory burden. However, we consider that several elements of the proposed framework require strengthening to ensure the Regulations are evidence-based, risk-proportionate and operationally workable for local government.

Support for Reduced Clearance

We strongly supports adoption of the former Electric Line Clearance Consultative Committee (ELCCC) recommendation to reduce the minimum clearance space for uninsulated low-voltage lines in Low Bushfire Risk Areas (LBRA) from 1000 mm to 300 mm.

This recommendation reflects a sector-wide position informed by local government, arboricultural and distribution expertise. A reduced clearance would:

- Reduce unnecessary canopy loss
- Improve long-term tree structure and stability
- Reduce repeat pruning cycles and associated costs
- Maintain appropriate safety outcomes in low-risk environments

Request for Evidence Transparency

The RIS notes that reduced clearance distances used in other jurisdictions are not considered suitable for Victoria due to environmental differences.

Council requests that DEECA publish the technical and engineering analysis supporting this position, including:

- Flashover modelling assumptions
- Environmental and climatic factors considered
- Comparative risk analysis between clearance scenarios

Transparent evidence is essential to support sector confidence and ensure the final Regulations align with the RIS commitment to evidence-based policy.

Governance Framework: The Trial Division (Clause 38)

We support the inclusion of a trial mechanism under the preferred option. Trials provide an important pathway to generate the evidence needed for future regulatory reform.

However, the effectiveness of this mechanism will depend on transparent and consistent governance.

Requirement for Reasoned Decisions

Where a trial or alternative compliance proposal is refused, distribution businesses or Energy Safe Victoria should be required to provide a written technical justification that:

- Identifies the specific safety risk that cannot be mitigated
- Provides supporting engineering or risk evidence
- Does not rely solely on operational or commercial considerations

Without this requirement, there is a risk that the trial process becomes discretionary and does not deliver the evidence outcomes intended by the RIS.

Establishment of the Electric Line Clearance Technical Advisory Panel (ELCTAP)

The abolition of the ELCCC has created a gap in sector-level technical collaboration. We recommend the establishment of a multi-disciplinary advisory panel to:

- Provide technical advice on trial proposals
- Review emerging evidence
- Support consistent interpretation of the Regulations
- Inform future Code or regulatory updates

This would strengthen the evidence base and support the RIS objective of continuous improvement.

Operational and Financial Impacts for Local Government

Vegetation clearance around powerlines represents a major ongoing cost for Council, including:

- Contract pruning and removal
- Inspection and audit programs
- Traffic management and site safety
- Community engagement and complaints management
- Rework associated with prescriptive clearance requirements

Where clearance distances exceed what is required for risk management, the impact is:

- Increased operational cost
- Reduced investment capacity for broader urban forest programs
- Long-term canopy decline

We request that the final regulations prioritise risk outcomes over prescriptive settings, consistent with the RIS objective to reduce unnecessary burden on responsible persons.

Support for the proposed regulations

We support the following changes:

- Five-year Electric Line Clearance Management Plans
- Aligns with operational planning cycles and reduces administrative duplication.
- Improved record-keeping for indigenous or significant trees
- Supports transparency and better protection of high-value vegetation.

These changes will improve efficiency and accountability, however where there are additional record keeping / planning / reporting and protection of vegetation and fauna requirements that have an associated cost burden we request that funding is provided to fund these additional services.

Merri-bek City Council Officers supports the intent of the proposed Regulations to maintain public safety and network reliability.

To achieve the RIS objectives of improved environmental outcomes, reduced burden and evidence-based regulation, the final framework must enable risk-proportionate clearance, transparent decision-making and genuine innovation.

We look forward to ongoing engagement as the Regulations are finalised.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Greg Rodwell', written in a cursive style.

Greg Rodwell
Acting Director City Infrastructure
grodwell@merri-bek.vic.gov.au

23 February 2026