Parks Victoria Electric Line Clearance Management Plan

2024 - 2025

The following Electric Line Clearance Management Plan was prepared by Parks Victoria for the 2024-2025 period. The sections contained in the following Plan are as per Regulation 9(4) (Management Plans) of the Electricity Safety (Electric Line Clearance) Regulations 2020





Acknowledgement of Country

Victoria's network of parks and reserves form the core of Aboriginal cultural landscapes, which have been modified over many thousands of years of occupation. They are reflections of how Aboriginal people engaged with their world and experienced their surroundings and are the product of thousands of generations of economic activity, material culture and settlement patterns. The landscapes we see today are influenced by the skills, knowledge and activities of Aboriginal land managers. Parks Victoria acknowledges the Traditional Owners of these cultural landscapes, recognising their continuing connection to Victoria's parks and reserves and their ongoing role in caring for Country.

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Document history

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1 Introduction

Parks Victoria's (PV's) Electrical Line Clearance Management Plan outlines the process to be used by workers to manage vegetation clearances around Private Overhead Electric Lines (POELs) within declared area parks, in compliance with the *Electricity Safety (Electric Line Clearance) Regulations 2020*.

This document requires annual review in line with the *Electricity Safety (Electric Line Clearance) Regulations 2020* (the Code) and Parks Victoria's internal policies and practices. An annual review will enable the Plan to be modified and refined as appropriate, to reflect the on-ground environment and to expand the scope of the Plan as additional and up-to-date information is assembled relating to vegetation management, appropriate pruning cycles, regrowth rates, new asset information and the ongoing works program.

The annual schedule used to achieve compliance with the Regulations involves a process of consultation with teams responsible for managing POELs across the Parks Victoria estate prior to preparation of this Plan (coordinated by Corporate Teams) and submission for internal approval prior to March 31 each year. There is no requirement to submit the plan to the regulator, Energy Safe Victoria (ESV), each year but if requested in writing at any time, the plan must be submitted to ESV within 14 days. Typically, a plan may be requested by ESV to be submitted every 3 to 5 years. Upon request and review by ESV, feedback provided by the Regulator is integrated into the Plan within 14 days of receiving the information. Acceptance of the Plan by the Parks Victoria Board occurs after acceptance of the Plan by Energy Safe Victoria.

1.1 Context

Parks Victoria manages over 4 million hectares of Victoria's national, state and regional environmental, recreational and tourism assets, as well as Melbourne's bays and waterways. This includes significant areas of forested parks in metropolitan Melbourne and in regional Victoria. The review of the Electrical Safety (Electric Line Clearance) Regulations means that responsibility for vegetation clearance in "Declared Areas" is the responsibility of the major Electricity Companies. However, in order to service infrastructure necessary to manage public land Parks Victoria 'owns' Private Overhead Electric Lines (POEL's).

In accordance with the *Electricity Safety (Electric Line Clearance) Regulations 2020* Parks Victoria is required to comply with the requirements specified in the Regulation and prepare a management plan for those POEL's.

Managing vegetation clearances around powerlines is prescribed in the *Electricity Safety (Electric Line Clearance) Regulations 2020.* The regulations require Parks Victoria, as a responsible person, to comply with the Code where the POEL's are located in parks this 'Management Plan' has been prepared to ensure Parks Victoria's compliance to the Code and to minimise fire risk.

This Management Plan describes how Parks Victoria:

- Fulfils its obligations under the Code.
- Protects the community by managing vegetation and through engagement.
- Ensures the cultural heritage, environmental and vegetation values contained are considered when managing vegetation clearance around powerlines in or adjoining Parks Victoria's parks and reserves.
- Maintains a safe place of work for its workers.

1.2 POEL 'Ownership' and Management Responsibility

Parks Victoria maintains a number of Private Overhead Electric Lines (POELs) which directly service its own assets, typically buildings, lighting or similar assets. The organisation must maintain and monitor these lines consistent with the Regulation (*Electricity Safety (Electric Line Clearance) Regulations 2020*).

Some Parks may, by agreement, manage the power lines owned by another (e.g., Air Services), when in the opinion of Parks Victoria, its strategic values (e.g., cultural heritage, environment) may be compromised without direct control of the clearance process. Parks Victoria only commits to these discretional activities where it has the expertise, equipment and capacity to undertake such works. No current agreements are in place.

The management agreement with a third party for their POEL should include the following:

- A statement of what clearances will be maintained
- Descriptions of the scope of works covered by the agreement (includes disposal)
- When the inspections and works will occur
- Points of contact should a fault be identified (all hours)
- Cost recovery arrangements (where appropriate)

This management plan focusses on clearance requirements between line and vegetation. However, there is also an obligation to manage any electric poles and electric lines from an asset management perspective to ensure neither of these assets contribute to their own right.

2 Purpose

The purpose of this Management Plan is to:

- Outline Parks Victoria's responsibilities and obligations within the scope of the Regulation and the activities necessary to achieve compliance.
- Clearly specify what is required to minimise the likelihood of vegetation interacting with overhead power lines and where that should occur.
- Minimise the potential for injury as a consequence of workers coming into contact with energised electrical conductors and equipment, extending to the safety of the Visitor seeking to use the Park for their recreation and enjoyment.
- Describe methods intended to protect strategic park values including amenity, cultural heritage and significant vegetation which contributes to the visitor experience, whilst satisfying community expectations in relation to powerline (and bushfire) management.
- Describe what actions are required to implement and verify the Plan, by whom and when the actions should occur.
- Describe the steps necessary to verify that planned works have occurred.
- Provide a statement of skills and equipment necessary to fulfil the requirements of this plan in a safe and timely manner.
- Describe linkages to emergency preparedness and planning procedures.

2.1 The Objectives of the Plan

This Plan has been developed in line with the *Electricity Safety (Electric Line Clearance) Regulations 2020,* Regulation 9(4) Management Plans to describe Parks Victoria's commitment to compliance with the Regulation and comprises of the following areas:

- 1. Details of the Responsible Person.
- 2. Details of the Person who was responsible for the Preparation of the Management Plan.
- 3. Details of the Persons who are responsible for carrying out the Management Plan.
- 4. Details of a person who can be contacted in an emergency that requires clearance of an electric line that the responsible person is required to keep clear of trees.
- 5. The Objectives of the Plan.
- 6. The land to which the management plan applies by the inclusion of a map.
- 7. The location of areas containing trees which may need to be cut or removed to ensure compliance with the Code and that are native, listed in the planning scheme to be of ecological, historical or aesthetically significant, or trees of cultural or environmental significance.

- 8. The means which the responsible person is required to use to identify a tree specified in point seven above.
- 9. The management procedures that the responsible person is required to adopt to ensure compliance with the Code, which must— include details of the methods to be adopted for managing trees and maintaining a minimum clearance space as required by the Code; and specify the method for determining an additional distance that allows for cable sag and sway for the purposes of determining a minimum clearance space in accordance with Division 1 of Part 3 of the Code.
- 10. The procedures to be adopted if it is not practicable to comply with the requirements of AS4373 while cutting a tree in accordance with the Code.
- 11. A description of each alternative compliance mechanism in respect of which the responsible person has applied, or proposes to apply, for approval under clause 31 of the Code.
- 12. The details of each approval for an alternative compliance mechanism that the responsible person holds and is in effect.
- 13. A description of the measures that must be used to assess the performance of the responsible person under the management plan.
- 14. Details of the audit processes that must be used to determine the responsible person's compliance with the Code.
- 15. The qualifications and experience that the responsible person must require of the persons who are to carry out the inspection, cutting or removal of trees in accordance with the Code and the Electricity Safety (General) Regulations 2019.
- 16. Notification and consultation procedures, including the form of the notice to be given in accordance with Division 3 of Part 2 of the Code.
- 17. Dispute resolution procedures.
- 18. Method for determining an additional distance that allows for cable sag and sway may provide for different additional distances to be determined for different parts of a span of an electric line.

Methods for compliance with the requirements described in the Electricity Safety (General) Regulations 2019 whilst performing operations near / around powerlines.

The above objectives seek to demonstrate that Parks Victoria commits to:

- Ensuring Electrical Safety is maintained within the workplace and for the community
- Supporting systems which maximise reliability and minimise disruption to the power supply
- Minimising fire starts as a consequence of power infrastructure involvement.

3 Regulation and Management Plan Cross Map

 Table 1 - Summary of how each mandatory part of the Management Plan relates to clauses in Regulation 9 of the Electricity Safety

 (Electric Line Clearance) Regulations 2020.

Item	Parks Victoria Management Plan Section	Regulation
1	This Management Plan. Parks Victoria is identified as a 'Responsible Person' under this clause and is therefore obligated to produce a Management Plan.	4 (2) A responsible person that is not a major electricity company, before 31 March in each year, must prepare a management plan relating to compliance with the Code for the next financial year.
2	Section 5.1 Name, Address and Telephone Number of the responsible Person for Approving Management Plan. Identified as the CEO of Parks Victoria.	4 (a) the name, address and telephone number of the responsible person
3	Section 5.2 Name, Position, Address and Telephone Number of the Person who was responsible for the preparation of the Management Plan	4 (b) the name, position, address and telephone number of the individual who was responsible for the preparation of the management plan
4	Section 5.3 Name, Position, Address and Telephone number of the Persons who are responsible for carrying out the Management Plan Identified as the Regional Director supported by Area and District Land Management Teams.	4 (c) the name, position, address and telephone number of the persons who are responsible for carrying out the management plan
5	Section 5.4 The telephone number of a person who can be contacted in an emergency that requires clearance of an electric line that the responsible person is required to keep clear of trees.	4 (d) the telephone number of a person who can be contacted in an emergency that requires clearance of a tree from an electric line that the responsible person is required to keep clear of tree
6	Section 2 <i>Purpose</i> With sub headings in this section detailing the objectives.	4 (e) the objectives of the management plan
7	Appendix 1 Parks Victoria Private Overhead Electric Lines with spatial references and parkland location as described in this Plan in a tabulated summary	4 (f) the land to which the management plan applies (as indicated on a map)
8	Section 6.3 <i>Risk Rating Methodology</i> for a statement of the Bushfire Risk in Parks managed by Parks Victoria. Appendix 1 <i>Parks Victoria Private Overhead Electric Lines</i> for detailed risk ratings aligned with inspection frequency of power assets.	4 (g) any hazardous bushfire risk areas and low bushfire risk areas in the land referred to in paragraph (f) (as indicated on the map);
9	Section 6.9 Identification and Management of Significant Vegetation makes reference this clause. Section 7 Managing Vegetation Clearances near POELs. This describes the process required to assess vegetation. Appendix 3 Parks Victoria Audit Template includes	 4 (h) each area that the responsible person knows contains a tree that the responsible person may need to cut or remove to ensure compliance with the Code and that is— (I) indigenous to Victoria; or (ii) listed in a planning ophere to be of each price.
	known to workers performing tree clearances and provides mechanism for sharing important information and specific areas of work or protection.	(ii) listed in a planning scheme to be of ecological, historical or aesthetic significance; or (iii) a tree of cultural or environmental significance

Item	Parks Victoria Management Plan Section	Regulation
10	Appendix 1 Parks Victoria Private Overhead Electric Lines. 'ACR AREA' column details the role responsible for ensuring that significant vegetation is identified.	4 (i) the means which the responsible person will use to identify a tree of a kind specified in paragraph (h)(i), (ii) or (iii);
	Section 5.3.1 <i>Mandatory Roles as Identified by this Plan</i> confirms the role of ACR is a role which must be occupied for purposes of Park Management.	
	Section 7.2 <i>Line Clearance Decision Process</i> nominates the ACR as the Land Manager responsible for managing power line clearances.	
11	Appendix 1 Parks Victoria Private Overhead Electric Lines method for managing the vegetation is described in table under column named 'Clearance Method'.	4 (j) the management procedures that the responsible person will adopt to ensure compliance with the Code, which—
	Section 6.4 <i>Timing of Works</i> details when the inspection and clearance works occur throughout the year as part of a planned maintenance regime.	 (i) must include details of the methods to be adopted for managing trees and maintaining a minimum clearance space as required by the Code;
	Section 7.4 General Rules for Clearance of Vegetation which is not 'Significant' specifies the preferred minimum vegetation clearances for low voltage POELs in Parks for various pole to pole spans.	
	Section 7.4 General Rules for Clearance of Vegetation which is not 'Significant' is used in circumstances where the standard clearances in previous sections cannot be achieved due to other strategic values being affected.	
	Section 7.7 <i>Peers Required to Audit Vegetation Clearance Works</i> includes requirements for the specified powerline clearance works to be audited by Organisational peers.	
12	Section 7.4 General Rules for Clearance of Vegetation which is not 'Significant' specifies the preferred minimum vegetation clearances for low voltage POELs and includes an allowance for Sag and Sway by adopting the same clearance along the full length of the powerline equivalent	4 (j) (ii) for the purposes of determining a minimum clearance space in accordance with Division 1 of Part 3 of the Code—
	to a clearance which would be required for the longest practical span in that working range. This reduces error and standardises practices across all Parks.	 (A) must specify the method for determining an additional distance that allows for conductor sag and sway; and
	Section 7.5 Alternative Treatments for Vegetation which is Considered Significant provides an accepted formula for reducing clearances whilst maintaining allowances for sag an sway along the length of that conductor as determined at different points along the electric line span.	(B) may provide for different additional distances to be determined for different parts of an electric line span;
	Section 7.7 <i>Peers Required to Audit Vegetation Clearance</i> <i>Works</i> includes requirements for the specified works which include sag and sway to be audited by Organisational peers.	
13	Section 7.5.2 Procedures to be adopted if it is not practicable to comply with the requirements of the AS4373 while cutting in accordance with the Code.	4 (k) the procedures to be adopted if it is not practicable to comply with the requirements of AS 4373 while cutting a tree in accordance with the Code;
	This section is supported by provisions for urgent works as would be typical of storms or similar damage to vegetation proximate to electric lines and is described in Section 6.12 <i>Emergency Cutting and Pruning.</i>	
	Section 6.8.2 <i>Dispute Resolution Procedures</i> support the handling of issues arising from the management of vegetation.	

Item	Parks Victoria Management Plan Section	Regulation
14	Section 9.1 Alternative compliance mechanism in respect of which the responsible person has applied, or proposes to apply, for approval under clause 31 of the Code describes that no mechanism is required presently. This is supported by Section 7.6 Continuous Improvement and Identification of Previously Unknown POELs which details how new information is integrated into the management process.	4 (I) a description of each alternative compliance mechanism in respect of which the responsible person has applied, or proposes to apply, for approval under clause 31 of the Code;
15	Section 9.1 Alternative compliance mechanism in respect of which the responsible person has applied, or proposes to apply, for approval under clause 31 of the Code details that parks Victoria does not require an alternative mechanism.	 4 (m) the details of each approval for an alternative compliance mechanism that— (i) the responsible person holds; and (ii) is in effect;
16	Section 9.2 A description of the measures that must be used to assess the performance of the responsible person under the management plan details the performance measures	4 (n) a description of the measures that must be used to assess the performance of the responsible person under the management plan;
17	Section 9.3 Details of the audit processes that must be used to determine the responsible person's compliance with the Code. Provides the criteria used to audit their performance and includes details of how departures from the plan are managed.	4 (o) details of the audit processes that must be used to determine the responsible person's compliance with the Code;
18	Section 8 TRAINING REQUIREMENTS SPECIFIC TO MANAGING POELs, details mandatory and desirable training requirements for all persons working near power lines specific to their allocated task. Section 8.1 Additional Requirements for Contractors provides additional guidance in relation to the Procurement Process and the inclusion of training as part of the evaluation process.	 4 (p) the qualifications and experience that the responsible person must require of the persons who are to carry out the inspection, cutting or removal of trees in accordance with the Code and the <i>Electricity Safety (General) Regulations 2019</i> Note: Regulation 616(2) of the Electricity Safety (General) Regulations 2019 sets out specific requirements for qualified persons carrying out vegetation management work.
19	Section 6.8 Notification and Consultation with Stakeholders provides guidance on who must be notified and when. Section 6.8.1 Notification and consultation procedures – Form of Notice provides specific information to be included in the Notice both internally and external to Parks Victoria	4 (q) notification and consultation procedures, including the form of the notice to be given in accordance with Division 3 of Part 2 of the Code;
20	Section 5 Name, Position, Address and Telephone number of the Persons who are responsible for carrying out the Management Plan In circumstances where the negotiation between parties fails, Section 6.8.2 Dispute Resolution Procedures is used to support resolution of the issue through Ombudsman or mediators.	4 (r) a procedure for the independent resolution of disputes relating to electric line clearance;
21	No exemption granted.	4 (s) if Energy Safe Victoria has granted an exemption under regulation 11 relating to a requirement of the Code, details of the exemption or a copy of the exemption.

4 **Definitions**

For the purpose of this management plan, the following definitions apply:

- Ecologically Significant Tree Any tree which has outstanding value as habitat for indigenous wildlife, including providing nesting, breeding or roosting habitat or any tree that is particularly old or very large (including height, trunk circumference or canopy spread), based on the Ecological Vegetation Classes (EVC).
- Environmentally Significant Tree Any tree of a species or variety that is rare or of very localised distribution, occurs in a unique location or context and so provides a major contribution to the landscape, including remnant native vegetation.
- Culturally Significant Tree Any tree recognised as associated with historic Aboriginal activities, including scar trees defined by the First Peoples State Relations.
- Historically Significant Tree Any tree which form part of a historic park or precinct.
- Aesthetically Significant Tree Any tree of outstanding aesthetic significance.
- Private Overhead Electrical Line (POEL) is any aerially mounted power supply which directly services a Parks Victoria asset (e.g. building) or asset which Parks Victoria has agreed to maintain because of its location within a park.
- Low Voltage Supply An alternating current supply of not more than 1000 Volts (1kV), meaning that 240V and 3 phase 415V are considered low voltage supplies.
- Uninsulated Supply is any 'bare wire' conductor capable of transferring electrical energy from contact with its surface.
- Insulated Supply is any conductor specially coated or protected to prevent the transfer of electrical energy should contact with the conductor's surface occur. Coatings are often rubber or plastic.
- Minimum Clearance Distance is the minimum separation between a power line (e.g. POEL) and surrounding vegetation. Clearances should reflect frequency of inspections and rate of regrowth.
- Arborist Usually a person who has completed a traineeship in Horticulture (Arboriculture) or higher qualification.
- ACR Area Chief Ranger
- RTL Ranger Team Leader
- FSO Field Services Officer / Ranger Park Services

5 Responsible persons

5.1 Name, Address and Telephone Number of the responsible Person for Approving Management Plan

Name of Chief Executive Officer:Matthew Jackson, Parks VictoriaAddress:Level 10/535 Bourke St Melbourne Vic 3000Office Telephone No.:13 19 63

5.2 Name, Position, Address and Telephone Number of the Person who was responsible for the Preparation of the Management Plan

Name:	Ben Skinner
Position:	Executive Director, Infrastructure
Address:	Level 10/535 Bourke St Melbourne Vic 3000
Telephone No:	13 19 63
Email Address:	Ben.Skinner@parks.vic.gov.au

5.3 Name, Position, Address and Telephone number of the Persons who are responsible for carrying out the Management Plan

The Facilities and Asset Management Directorate lead this plan with assistance of external contractors and the local regional teams in carrying out the plan.

Name:	Tracy Mawhinney
Position:	Director Facilities and Asset Management
Business Address:	Level 10/535 Bourke St Melbourne Vic 3000
Telephone No:	13 19 63
Email Address:	Tracy.Mawhinney@parks.vic.gov.au

5.4 The telephone number of a person who can be contacted in an emergency that requires clearance of an electric line that the responsible person is required to keep clear of trees

Name:	Andrew Carpenter
Position:	Senior Manager Asset Planning – Facilities and Asset Management
Business Address:	Level 10/535 Bourke St Melbourne Vic 3000
Emergency Telephone No:	13 19 63
Email:	Andrew.Carpenter@parks.vic.gov.au

6 Risk Management Framework for POELs

6.1 Details of POELs subject to management under this Plan

This Management Plan relates to all POELs as identified in Appendix 1 *Parks Victoria Private Overhead Electric Lines* and contained on the lands managed by Parks Victoria directly or by agreement where it is otherwise not practicable for the 'owner' to manage those lines directly themselves.

6.2 Asset Management Systems and Mapping

Maps detailing the location of all POEL's owned by Parks Victoria have been added to Parks Victoria's Asset Information Management system (AMIS). The Senior Manager Asset Planning is responsible for all planned inspections, maintenance and reporting specific to POELs and will co-ordinate with the local Area Chief Rangers to facilitate the work.

Maps of the POELs and other electrical infrastructure will also be incorporated into the Park Emergency Plans as a source of key intelligence during an emergency response. Inspections are recorded against the physical assets as work orders. Any vegetation clearance requirements are captured against the trees themselves.

6.3 Risk Rating Methodology

For the purposes of this Management Plan, all Parks Victoria Parks (Public Land) are rated as being Hazardous Bushfire Risk Areas.

Parks Victoria has conducted an assessment of each declared area park containing electrical assets and has applied a fire risk rating to each park as a means of increasing risk sensitivity where it is required most. For the purpose of determining inspection or audit frequency (annual for high risk and biennial for low risk), the vast majority of parks have been rated as high risk (Appendix 1 *Parks Victoria Private Overhead Electric Lines*). The risk rating was determined using the following parameters:

Fire Risk Rating	Characteristics	Audit Frequency
High Risk	Vegetated park in a rural, urban or peri-urban area where destructive fires could reasonably be expected to occur should one start for any reason. Continuous forest or grasslands or a mix of the two.	Annual
Low Risk	Frequently cut (managed) parklands typical of some urban park or parks where there is little or no vegetation (e.g. bare soil) such as a lake or dry lake bed.	Biennial*

Table 2 – Audit Frequency based on fire risk rating

*Where a biennial inspection program is undertaken, cutting for clearance plus two years re-growth will be undertaken to ensure all round compliance.

Parks Victoria inspects areas which require line clearance (based on the high and low risk methodology outlined above) and identifies the most appropriate mitigation based on available skills, equipment and local environment. The works may be completed internally or outsourced where specialist skills are required. An inspection of the area after works have been completed seeks to verify compliance with the specified works. The process is documented in the Appendix 4 *Template – Private Overhead Electric Lines Conformance Record* locally.

As part of the annual or biennial inspections, trees which are in breach of the Code will be identified. In addition, any trees which are determined to be likely to breach the Code in the next 12 months (high risk) and 24 months (low risk) are also to be identified. This inspection should also include the identification of any hazards outside the clearance and regrowth spaces that may require assessment or correction.

6.4 Timing of Works

The timing of the works necessary to manage power line clearances should occur prior to the Fire Danger Period in all parks unless the works are urgent and in response to unexpected regrowth, significant damage (e.g., bough has broken) or tree fall. Additionally, in parks subject to heavy snowfalls the inspections should occur either side of the snow season with the intention of addressing trees which could contact the lines under heavy snow loads to minimise the potential for supply disruptions (as opposed to fire).

This means that the timing of inspections must occur with sufficient time for works to occur prior to seasonal events occurring. Works will be dependent upon access requirements (e.g., unformed tracks must be trafficable) and thus the timing of works will vary year by year and district by district across the State of Victoria. As a guide the management of power assets occurs in accordance with the two Schedules below, with green noting where Parks Victoria are the directly responsible for completion of the activity, the blue may be completed by an external provider or Parks Victoria team members with suitable qualifications.

The Senior Manager Asset Planning is responsible for coordinating the resources necessary and liaising with each ACR to implement the plan below.



Table 3 - Indicative works schedule for Parks

* The program must consider heavy snow falls, typically areas above 1400m (e.g., Mt Buffalo, Mount St Gwinear)

6.5 Notifications to undertake (Mandatory) Works

Locations notified by the distribution company or any other interested party as requiring attention to maintain powerline clearances, which are the responsibility of Parks Victoria will be received through Senior Manager Asset Planning who will co-ordinate assessment through the relevant District Manager and relevant Area Chief Ranger as soon as practical following receipt of the notice. Any notifications of mandatory works should be directed to the District Manager. If local teams need to escalate the matter, the Senior Manager Asset Planning should also be notified. The District Manager and ACR are responsible for informing the Senior Manager Asset Planning of any mandatory works requirements.

Identified works are incorporated into the Asset Management Information system (AMIS) using the template provided in Appendix 4 *Template – Private Overhead Electric Lines Conformance Record* and included in the incident reporting system if it meets the definitions of a near miss, hazard or similar.

6.6 Record of Actions Necessary to Manage Risk

Each inspection shall be fully documented and works for each POEL identified and described using the Work Instruction sheet or similar (refer to Appendix 2 *Example Work Instruction Sheet*).

A record of when the identified works have been completed and verified should be incorporated into the local record for Power Line Management (refer Appendix 4 *Template – Private Overhead Electric Lines Conformance Record*). The non-conformances shall be noted on the same record and corrective actions detailed. A record of the inspection process shall be maintained at Parks Victoria and kept for a minimum of five years.

Appendix 3 *Parks Victoria - Audit Template* provides details on the method used to confirm that the relevant workplace controls have been implemented specific to POELs.

6.7 Relationship with Emergency Preparedness and Response

The Parks Victoria Emergency Plans (specific to land management activities) use 'triggers' to activate the plan. A trigger is a specific and measurable, agreed attribute by which workers can reliably detect an emergency or the precursor conditions of one. The triggers used in the emergency plans which integrate with this emergency plan vary across Victoria. Identified triggers for ad hoc inspections are detailed in the table below.

SEMP Group	Trigger for inspection
Storm (Wind)	Widespread damage to trees proximate to the POEL
	Destructive Winds with average winds exceeding 90km/hr and wind gusts exceeding 125 km/hr.
Storm (Snow / Blizzard)	Heavy snow leading to widespread drooping of limbs and breakage
	Blizzard Conditions as defined by warning which predict strong winds in conjunction with blowing or falling snow with an expected reduction in horizontal visibility to less than 200 metres
Fire (Code Red)	Precautionary response to a fire danger rating index exceeding 100 and otherwise known as 'code red'.

Table 4 - Summary of triggers used in Parks Victoria to prompt an inspection of POELs

Workplace Emergency Plans, developed in accordance with AS3745, describes actions to be taken in the event of electrocution or fire and are specific to workplaces managed by Parks Victoria.

6.8 Notification and Consultation with Stakeholders

Parks Victoria will ensure adequate notice is given to affected persons regarding programmed line clearance works.

Notification of Parks Victoria's program of works will be undertaken in accordance with the *Electricity Safety (Electric Line Clearance) Regulations 2020.* Where PV intends to cut or remove a tree that is on public land that is not privately owned, or near the boundary of a private property, or where the tree is of cultural or environmental significance, PV as the responsible person, will give notice of the intended cutting or removal to all affected persons in accordance with the regulations. An example of such works is the removal of wind break trees on the foreshore.

Where affected persons may be impacted by the planned vegetation works, prior to the commencement of works, notice will be given in writing or by publication in a newspaper circulating generally in the locality of the land in which the tree is to be cut or removed at least 14 days and no more than 60 days before the intended works.

Where the tree intended for cutting or removal is a tree of cultural or environmental significance, notice will include the impact of the cutting or removal of the tree and the actions to be taken to minimise that impact.

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Decisions on removal or "clearing" of trees will be in accordance with PV's maintaining line clearance decision making process (Refer Section 7 *Managing Vegetation Clearances Near POELs*). By maintaining the annual inspection and cutting program and allowing for growth for individual species no urgent pruning or clearing should be required. In the case of urgent cutting or removal being required, PV will ensure that the process identified under Section 6.12 *Emergency Cutting and Pruning* is followed, in accordance with the requirements of the Code.

6.8.1 Notification and consultation procedures – Form of Notice

Parks Victoria will ensure adequate notice is given to affected persons in regard to programmed line clearance works where there is potential impact. Notification of Parks Victoria's program of works will be undertaken in accordance with the *Electricity Safety (Electric Line Clearance) Regulations 2020*. Where Parks Victoria intends to cut or remove a tree that is on public land or within the boundary of private property which the responsible person neither owns or occupies or where the tree is of cultural or environmental significance Parks Victoria as the responsible person will give notice of the intended cutting or removal to all affected persons in accordance with regulations.

Outside of an emergency situation, where circumstances require, Parks Victoria will give notice of not less than 14 days and not more than 60 days prior to the commencement of programmed works for the removal or cutting of a tree to maintain the required space around and electric line. Notice will be given by Parks Victoria's website and communicated directly to those affected (in writing).

Where works are not carried out within the notified timeframe, re-notification will be provided.

A website consultation notice should include:

- A description of the process.
- Who is responsible for managing the consultation occurs.
- Who can be contacted and how this should occur.
- When the consultation period begins and ends.
- The purpose of the consultation as it relates to the community.
- A summary of the Parks affected.

The internal process for consultation requires notification to the Asset Planning Team and the notice should detail:

- The name of the owner or operator of the electric line (e.g. Parks Victoria, Air Services Australia)
- The name and position within the Asset Planning Team of the person to be consulted / informed
- The ACR's contact phone number and email
- A description of the works to occur including a map or similar (Refer Appendix 4 *Template Private Overhead Electric Lines Conformance Record*).
- If the ACR is yet to be informed, in cases where the works are initiated by others, the Asset Planning Team will co-ordinate this consultation with the local team.

6.8.2 Dispute Resolution Procedures

For the purposes of this plan, a dispute is a situation where the normal processes of consultation and negotiation relating to trees affected by powerlines fail to provide a satisfactory result. If a dispute arises between the responsible person for carrying out the plan and a member of the public, Parks Victoria will initiate its internal dispute resolution procedure. If the dispute is not resolved by this method within the outlined time period, the dispute will be referred in writing to the Energy & Water Ombudsman Victoria or an alternative dispute resolution entity.

For external reviews the following can be contacted:

Victorian Ombudsman

The Ombudsman is an independent officer of the Victorian Parliament who investigates complaints about the State Government departments, most statutory authorities and local government.

Phone: 03 9613 6222

Toll Free: 1800 806 314

Email: ombudvic@ombudsman.vic.gov.au

Web: www.ombudsman.vic.gov.au

Dispute Settlement Centre of Victoria

The Dispute Settlement Centre of Victoria can help you resolve a wide range of disputes without having to take legal action.

Phone: 03 5440 6100

Web: www.disputes.vic.gov.au

Energy and Water Ombudsman Victoria

Phone: 1800 500 509

Email: ewovinfo@ewov.com.au

Web: www.ewov.com.au

6.9 Identification and Management of Significant Vegetation

Parks Victoria manages significant areas of forested parks in metropolitan Melbourne and in regional Victoria. These areas consist of mixed native, remnant and introduced species.

Areas containing trees which may need to be cut or removed to ensure compliance with the Code are also assessed for their significance, that being vegetation which is:

- (i) indigenous to Victoria; or
- (ii) listed in a planning scheme to be of ecological, historical, or aesthetic significance; or
- (iii) a tree of cultural or environmental significance.

Parks Victoria will take into consideration the existence of vegetation assets such as those defined in this section above and the mitigation measures required to preserve and maintain the site-specific values, prior to undertaking any vegetation works within declared area estates. To ensure preservation of such values, Parks Victoria has developed an internal practice to ensure that <u>any</u> vegetation works within a declared area require a vegetation assessment.

6.10 Methods used to identify significant vegetation

Areas of environmental, historical, cultural, aesthetical, and ecological significance inclusive of habitat significance for rare or endangered species have been identified throughout Parks Victoria's estates and recorded on its internal GIS/database or accessed via searching relevant Federal, State and Local lists.

The Area Chief Ranger (ACR), or their delegate, responsible for the identification of significant vegetation and animals supplements their local Land Manager experience and knowledge by using a variety of tools which support currency of knowledge as detailed below.

Theme	Information sources supporting currency of knowledge	
Cultural	Traditional Owner engagement (esp. Joint management areas)	
Heritage	DEECA Cultural Heritage Tree Assessment Tool (esp. unidentified trees)	
	Internal engagement with Managing Country Together Team members.	
	Victorian Heritage Register (<u>https://heritagecouncil.vic.gov.au</u>)	
	Victorian Aboriginal Heritage Register (<u>https://www.aboriginalvictoria.vic.gov.au/victorian-aboriginal-heritage-register</u>)	
	Restricted Layers in EMap via staff with access	
Threatened fauna, flora and	List of threatened flora and fauna species: <u>https://www.environment.vic.gov.au/conserving-</u> threatened-species/threatened-list	
communities:	https://www.environment.vic.gov.au/ data/assets/pdf file/0031/536089/FFG-Threatened-List- September-2022.pdf	
	Ecological specialists within Parks Victoria (and sister Agencies)	

Table 5 - Details of information sources used by the ACR to maintain currency of knowledge in an ever-changing landscape.

Parks Victoria will adopt the following process to enable mitigation measures to be undertaken where a tree of value is nominated as requiring cutting works (predominantly pruning, although partial removal may also be required in certain circumstances) in order to maintain compliance. Process for Identifying a Tree Specified in the section above.

Where a tree is inspected as part of Parks Victoria's annual inspection program and nominated for cutting works in order to maintain the clearance space, the details of the location of the tree or alternatively the closest electrical pole to the vegetation nominated for cutting will be recorded (e.g. pole LIS and latitude and longitude) and the required works will be detailed via the work instruction sheet (i.e. cutting 1m, partial removal, full removal). Trees selected for significant works will also typically be marked to avoid any confusion (e.g., incorrect tree is felled).

Parks Victoria will conduct a desktop analysis on the tree/pole location via their GIS system using the electrical asset overlay (based on information provided by the distribution business) to determine the existence of trees located within a 500m radius of the works site classified as environmental, historical, cultural, aesthetical and ecological (inclusive of habitat) significance.

Depending on the type of record highlighted by the data search (i.e., significant fauna species, high conservation status) Parks Victoria may conduct a follow up field audit at the proposed worksite to verify the data and confirm to what extent the proposed works will impact the environment (i.e. confirm if the tree is a habitat tree and verify the fauna species, breeding times etc).

Based on the results of the desktop and where undertaken, field audit, Parks Victoria will issue information on the location of those significant trees located within the vicinity of the works area to the nominated cutting crew along with any specific mitigation measures deemed necessary to minimise the impact of the work.

A site meeting will be held prior to the commencement of works to discuss the work instruction and verify the mitigation measures to be undertaken by the workers at the work site.

Where Parks Victoria intends to cut or remove a tree that has been identified as habitat for fauna listed as threatened in accordance with section 10 of the *Flora and Fauna Guarantee Act 1988* or listed in the Threatened Invertebrate Fauna List with a conservation status in Victoria of "vulnerable", "endangered" or "critically endangered" or listed in the Threatened Vertebrate Fauna List with a conservation status in Victoria of "venerable", "endangered" or "critically endangered" Parks Victoria will have the tree assessed by a suitably qualified arborist and undertake cutting or removal of the tree outside of the breeding season for that species. Where it is not practicable to undertake cutting or removal of the tree outside of the breeding season for that species, translocation of the fauna will be undertaken wherever practicable. All records will be filed at the relevant Parks Victoria Regional Office, as described in the Responsible Contacts section above and kept for a minimum of five years.

All pruning will take place in accordance with AS4373, and where practicable, pruning may be undertaken using elevated work platforms or other similar methods in an effort to minimise overall site damage. Parks Victoria will as far as practicable, restrict cutting or removal of native trees or of cultural or environmental significance to the minimum extent necessary to ensure compliance with the requirements of the code, the schedule to the code or to make an unsafe situation safe.

It is assumed that no mineral (earth) or understorey disturbance will take as part of Parks Victoria's vegetation cutting program. In the event of such works being required, its Natural Values Team will conduct a specific site assessment to consider the impact such works may have on the asset. Where relevant the Team will recommend mitigation measures to reduce the impact of the works on the asset. These recommendations will be implemented on a case-by-case basis.

6.11 Hazardous Trees

In a situation where Parks Victoria or its contractors identifies a tree that is likely to fall onto or otherwise come into contact with an electric line, the tree will be assessed using a suitably qualified arborist who holds the qualification of National Certificate Level IV in Horticulture and Arboriculture, including the "Assess Trees" module, or an equivalent qualification and at least three years of field experience in assessing trees.

In situations where the arborists' assessment confirms the likelihood of contact with the electric line having regard to foreseeable local conditions including weather and round instability, Parks Victoria will remove or cut the hazard tree as per the Code. In the event of a hazard tree being identified as a culturally significant, environmentally significant or habitat tree, Parks Victoria will where possible minimise the impact on the tree or fauna and consult with affected stakeholders, to ensure compliance with the requirements of the code, the schedule to the code or to make an unsafe situation safe.

6.12 Emergency Cutting and Pruning

Parks Victoria will undertake emergency cutting and pruning activities in the following situations:

- Where a tree is identified as encroaching the clearance space due to unanticipated growth;
- As a result of a tree falling or becoming damaged so that it requires cutting or removal to maintain the required clearance space; or
- Where a tree has been assessed by a suitably qualified arborist and confirmed to have an imminent likelihood of contacting the electric lines having regard to foreseeable local conditions.

After undertaking emergency cutting or removal in accordance with the regulations, Parks Victoria will as soon as practicable after completion of the works, give notice to all affected persons; occupiers of the land on which the tree was cut or removed and where appropriate, the owner of the land on which the tree was removed.

As part of such works, Parks Victoria will record where and when the cutting or removal was undertaken, identify why the cutting/removal was required and record when the last inspection of the tree occurred. All records will be filed Parks Victoria and kept for a minimum of five years. This record includes reporting the emergency works as an incident in Parks Victoria Incident Reporting System.

Parks Victoria will undertake urgent works in accordance with the Regulations and the specified minimum clearance space around the electric line as described in clearance tables in this document. Ongoing monitoring by visual assessment of the regrowth rates of Parks Victoria trees growing under powerlines will be undertaken to ensure continued compliance.

7 Managing Vegetation Clearances near POELs

7.1 Rules Governing Inspection Frequency

Parks Victoria is committed to conducting an annual audit of trees adjacent to it POEL's in all high fire risk parks and a biennial audit of trees in all low fire risk parks. The resultant annual cutting program will ensure clearances are maintained in accordance with the Code. Methods undertaken for the clearance of vegetation under powerlines will be in accordance with the *Electricity Safety (Electric Line Clearance) Regulations 2020*.

7.2 Line Clearance Decision Process

Decision to be made by the responsible officer in consultation with other relevant estate specific staff, with advice being taken from Parks Victoria management as to the availability of funds for clearance works based on a cost benefit analysis.

All pruning works will be undertaken in accordance with the *Electric Safety (Electric Line Clearance) Regulations 2020* and cut the tree in accordance with AS 4373 and best practice methods. The workflow is summarised below:

1. Parks Victoria Project Manager to monitor access and weather and select time to audit lines consistent with the schedules detailed in in Section 6.4 *Timing of Works*.

Detailed assessment of vegetation along the powerline alignment to determine the specific pruning requirements of each tree will be assessed and recorded during the initial inspection. For scope of works refer to Section 9.3 *Details of the audit processes that must be used to determine the responsible person's compliance with the Code.*

- 2. Arborist assessment of trees including written report for any trees requiring removal or major structural pruning detailing the reasons why and alternative methods available for management.
- 3. Lodge request to Managing Country Together Aboriginal Heritage Assessment System
- 4. Values checks using a variety of stakeholders and GIS platforms, refer Section 6.9 *Identification and Management of Significant Vegetation.*
- 5. Preparing notifications and dispute management if required, refer Section 6.8 *Notification and Consultation* with Stakeholders.
- 6. Issue works order for vegetation management works to occur.
- 7. Risk assessments supporting development of detailed plan to undertake site works including establishing a work area, preventing unauthorised entry, confirming skills and equipment.
- 8. Implement works program including confirming works have been completed as part of the asset records system.
- 9. Parks Victoria Project Manager to confirm audit and pruning have fulfilled the requirements of this Management Plan.

Line clearances will reflect local growing conditions and teams should adopt a conservative distance greater than the minimum specified. In some cases where significant vegetation is identified reduced clearances will be used with more frequent inspection times to maintain the separation distances specified.

Park Victoria aims to audit vegetation near powerlines and private electric lines throughout its estates to ensure full compliance. The Plan will be designed and delivered in two parts:

- The review and development of a plan to achieve compliance around powerlines.
- The review of private electric lines and development of a corresponding compliance plan.

On completion of works and inspection program, details will be documented in local records and copies sent to the Asset Planning Team.

Figure 1 - Decision process for determining line clearances



In consultation with Parks Victoria representative (i.e. Senior Manager Asset Planning & Area Chief Ranger) weigh options of a shorter pruning cycle, tree removal, or cable replacement with Aerial Bundled Cable or undergrounding, or other options as set out in the *Electricity Safety (Electric Line Clearance) Regulations* 2020. The decision will be based upon costing of the options in terms of tree value,

works cost and the surrounding environment of the tree. Arborist Report detailing works on trees requiring removal or which would become unviable if pruning was to occur.

7.3 Assessment of Regrowth Space

The Senior Manager Asset Planning in consultation with the District Manager, Area Chief Ranger and other Parks Victoria team members will observe and record the rate of growth of species under the growing conditions, which prevail in the estates and record and supply this information to the contractor, in an effort to apply these observations when determining the extent and frequency of pruning.

As part of the annual audit (note: high risk areas will be inspected annually, and low risk areas will be inspected biennially) the contractor will identify vegetation infringing the clearance space of the POEL owned by Parks Victoria in addition to any non-conformances. Hazards outside the clearance and regrowth spaces that may require assessment and correction will also be identified. Note: For the purpose of this Plan, a hazard tree is a tree that possesses hazardous faults which if not actioned, will negatively impact distribution assets. These trees may possess characteristics such as large cavities, severe decay, major cracks etc.

In addition to the annual audit, under Parks Victoria's emergency preparedness arrangements, staff will regularly monitor (as part of day-to-day duties) the areas of public land or its interfaces, where prevailing or conditions could affect the structural integrity of trees or other factors capable of causing tree hazards.

7.4 General Rules for Clearance of Vegetation which is not 'Significant'

The following rules should be applied in circumstances where the clearance of vegetation is not subject to location specific issues such as habitat trees and culturally significant trees. The table below details the standard line clearances for:

- insulated cable and uninsulated cable electric lines in all areas High Bushfire Risk Area (HBRA) and Low Bushfire Risk Area (LBRA)
- low voltage electric line
- Span distance of up to 100 metres

For simplicity Parks Victoria will apply the minimum clearance space requirements set out in table 5 to the entire length of the line regardless of swing and sway.

Power Line Type	Span length	Minimum clearance as per the Code	The maximum allowable line clearance is 10m. to allow for regrowth				
Insulated Low Voltage	up to 45	0.3m	10m (tree fall allowances)				
	between 45 and 100	0.9m					
Uninsulated Low Voltage	up to 45m	1.0m					
	between 45 and 100	2.5m					

Table 6 - POEL clearances for vegetation not considered significant (e.g. Culturally, Environmentally, Historical)

Refer to table detailed in *Appendix 1 Parks Victoria Private Overhead Electric Lines* for details on spans exceeding 45m for uninsulated lines and 100m for insulated lines. In such circumstances the following figure describes the minimum clearance unless a qualified Arborist or Advanced Feller have assessed the tree as being structurally sound and of an acceptable risk to the electric line. This approach is consistent with Victorian providers generally and is consistent along the length of the electric line regardless of its position relative to the pole.



Figure 2 - Parks Victoria adopts a vegetation clearance of 10m from the centre line of the conductor in circumstances where spans exceed 45m (bare conductor) or 100m (Insulated) which is consistent with power companies in Victoria

Reduced clearances may be achieved in some Parks provided the line has been the subject of a risk assessment considering the structural state of the tree and the local environment, the following section of the Management Plan details the approach for this clearance reduction, including varying the clearances based on the distance of the electric line from the pole itself.

7.5 Alternative Treatments for Vegetation which is Considered Significant

In circumstances where an affected person 'objects' to the pruning or clearing of vegetation near powerlines or vegetation is deemed as significant, Parks Victoria Officers will seek to determine if alternatives approaches can be used, for example:

- Reduced trimming with more frequent inspections
- Removal and replanting with suitable species
- Relocation of power supply underground
- Use of bundled conductors
- Removal of supply or other engineering solutions

The following sections describe the methods which may be adopted to modify the manner in which the supply occurs, the times at which it is available or minimise the modification of the affected vegetation in especially sensitive areas of Parks Victoria managed lands.

7.5.1 Minimising Clearances using the rules for Sag and Sway in Division 1 of Part 3 of the Code

The use of Division 1 of Part 3 of the Electricity Safety Regulations 2020 formulae and charts can enable achieving reduced clearances. The pruning determination considers local factors for sag and sway of overhead lines and applies solely to the middle two thirds of the line. Its purpose is to minimize the necessary clearance distances.

7.5.2 Procedures to be adopted if it is not practicable to comply with the requirements of the AS4373 while cutting in accordance with the Code

All tree pruning works must comply with AS4373 as far as reasonably practicable. In this instance "as far as reasonably practicable" in reference to AS4373 means that which is, or was at a particular time, reasonably able to be done to ensure the trees health, safety and amenity are not compromised.

This assessment of "reasonably practicable" will consider

- Hazard reduction works
- The likelihood of the hazard occurring
- The degree of harm that might result from the hazard occurring
- Habitat
- Tree species
- Age, condition and location of the tree
- Timing of works

Parks Victoria ensures that it has the most recent version of AS4373 through its subscription for Australian Standard updates with SAI Global. Where changes to the Standard are noted the suitably qualified arborist will provide this information to its staff and contractors. This includes all changes relevant to AS4373-2007 where standards would result in:

- A safety risk to the workers performing vegetation clearance
- A breach in the safe approach distances
- Potential safety risk to the public
- Minimal mitigation of fire risk, or
- Unacceptable damage to the amenity and structural integrity of a tree

On occasion AS4373 may not be able to be fully met, on these occasions officers will refer these cases on for discussion with relevant stakeholders to seek advice. Some cases may require the implementation of alternative methods to assist in complying with AS4373. Both short and long term solutions are to be investigated when an alternative is required.

Short term

Request assistance from the Distribution Business, including

- A suppression
- Shut down, or
- Live linesmen to complete clearance
- Submitting an exemption application for specific locations
- Increased inspection and pruning cycles
- Tree removal and replacement with a more suitable alternative
- Tree removal with no replacement

Long Term

- Installation of Aerial Bundle Cabling (ABC)
- Request for alternative cross-arm configurations
- Underground cabling

Where alternative methods are to be implemented, including tree removal, notification will be provided to any affected persons no less than 14 business days prior to works being undertaken, except when emergency works are deemed necessary.

Tree workers shall only undertake activities for which they have been trained, assessed and deemed competent to enable them to perform safely. They should comply with the minimum qualifications as outlined in paragraph 9(4)(p) and hold appropriate certificates for both themselves and their equipment that legally entitles them to undertake the work. Part of this training will include an awareness of the appropriate AS4373 Standards and applies to both internal and external staff engaged in vegetation clearances. Additionally, it has been recognised that the development of a tree induction for all contractors working in the vicinity of trees should be completed to ensure they are aware of their responsibilities. Identification of contractor qualifications is presently undertaken as part of the contractor engagement process, it is expected that a level of understanding of AS4373 is part of the selection criteria.

Only equipment, tools and personal protective equipment (PPE) that has been deemed appropriate for vegetation clearance of power lines shall be used. Energy Safe Victoria's document, *Electrical Safety Rules for Vegetation Management Work Near Overhead Power lines by Non-Electrical Workers* has been used to provide guidance https://www.esv.vic.gov.au/sites/default/files/2022-12/Electrical-Safety-Rules-for-Vegetation-Management-Work-Near-Overhead-Powerlines.pdf. PV ensures the use of appropriate plant and equipment through its procurement process and at the time that the contractor is inducted to site.

Compliance to AS4373 Standards will be determined through the inspection conducted throughout the cutting period by Parks Victoria staff. Should results be unsatisfactory, this will be indicated and remedial or corrective works to rectify any non-compliance will be undertaken as soon as practical. PV staff will conduct on site audits during the program, a copy of such an audit can be found at Appendix 1 *Parks Victoria Private Overhead Electric Lines*. The audit will ensure that, as a minimum, the following audit categories will be assessed on every occasion:

- Code compliance
- Quality including compliance with AS4373
- Work site management/ HSE
- Personnel qualifications and competencies
- Customer Satisfaction

Should non-compliance to AS4373 be identified on multiple occasions without reasonable justification, training refreshers will be investigated. Contractors or any internal staff that do not comply with AS4373 will be requested to provide evidence of refresher training and/or alternatively demonstrate an understanding by all staff onsite of AS4373. Further non-compliance could potentially result in the loss of contract. All staff and contractors will undergo an induction to the organisation, the program and the sites prior to any works commencing.

7.6 Continuous Improvement and Identification of Previously Unknown POELs

Parks Victoria recognises its obligations under the Code in regard to the management of tree clearances around private electric lines.

Appendix 1 *Parks Victoria Private Overhead Electric Lines* details the POELs known to service Parks Victoria's assets including within lighthouses and selected ranger stations. Not all the locations of private line across PV's assets are currently known.

Parks Victoria has commenced a review of power assets in an effort to identify and record the location of all private lines (on both owned and leased land). This information will be incorporated into the Management Plan when available, along with strategies to enable Parks Victoria to safely maintain these lines and meet its obligations under the *Electricity Safety (Electric Line Clearance) Regulations 2020*. PV intends to complete its collation and review of private lines.

New assets requiring clearance will need to be considered at the time of construction and added this plan accordingly.

7.7 Peers Required to Audit Vegetation Clearance Works

Parks Victoria requires that the vegetation clearance works identified and completed by its local teams or contractors, as described in the template provided in Appendix 4 *Template - Private Overhead Electric Lines Conformance Record*, be subject to audit by others not involved in the works program. The timing of this audit is described in Gantt Charts in Section 6.4 *Timing of* Works.

The audit should be completed by the ACR or their delegate from a work centre not directly involved in that work. In some cases, it may be appropriate for staff to be drawn from a neighbouring ACR management area if the District Management Team considers it necessary to maintain independence.

The audit confirms compliance with the specified works and verifies that works have occurred within specified timeframes, relevant notifications made and records for asset management updated

8 Training requirements specific to managing POELs

Line clearance activities must be completed by suitably qualified workers as determined by the types of clearance activities which are occurring. The tables below describes the tasks performed by "Ordinary Persons" and "Qualified Persons" as described in the Regulation 616(2) of the *Electricity Safety (General) Regulations 2019*.

All qualifications must be confirmed as 'current' prior to undertaking the tasks as determined using the Department of Energy, Environment and Climate Action's Learning and Development Information System / Parks Victoria Learning Management Systems or the Tendering process where external third parties (e.g. Contractors) are engaged to undertake works. Typically, staff with internal training must complete a refresher every two (2) years unless the training management systems requires a different frequency to be adopted.

8.1 Ordinary Persons taking part of Electric line clearance operations

Vegetation	Parks Victoria Role	Qualifications specific to line clearances				
Management Task						
Preliminary Inspections	Local Park Staff, typically Rangers, FSOs, RTL and ACR	 Mandatory qualifications Hazard Awareness training supporting the Draft Tree Risk Strategic Approach and incorporating Electrical asset identification. Relevant industry workplace experience or mentoring. 				
Detailed Tree Assessment	Tree Arborist External 'third party' preferred however arborists within Parks Victoria may also be used. OR	 Mandatory National Certificate III in Arboriculture including the "Perform a ground-based tree defect evaluation" unit of competency, or an equivalent qualification such as 'Advanced Faller' (Fire qualifications) At least three years of field experience in assessing trees in comparable environments and growing conditions. Application of pruning techniques and standards 				
	Parks Victoria Employee with relevant training	 Other relevant but not essential qualifications Certificate II ESI Powerline Vegetation Control Working Safely in the Construction Industry Working safely near live electrical apparatus; non-electrical worker Chainsaw operation Application of pruning techniques and standards Operate woodchipper and plant Safe Work Practices First aid Traffic management Environmental awareness Cultural awareness training 				

Table 7 – Roles and responsibilities for tree clearance works

Vegetation	Parks Victoria Role	Qualifications specific to line clearances				
Management Task						
Removal of Fallen Timber (Ground	Local Park staff, typically Rangers,	Mandatory qualifications First Aid 				
Crews)	FSOs, RTL and ACR	 Chainsaw operations (e.g. 'Trim and Crosscut' Certificate I) or similar levels of training and experience 				
		Manual Handling				
		 Hazard Awareness training supporting the Draft Tree Risk Strategic Approach and incorporating Electrical asset identification. 				
		Other relevant but not essential qualifications Certificate II ESI Powerline Vegetation Control 				
		Working Safely in the Construction Industry				
		 Working safely near live electrical apparatus; non-electrical worker 				
		Chainsaw operation				
		Application of pruning techniques and standards				
		Operate woodchipper and plant				
		Safe Work Practices				
		• First aid				
		Traffic management				
		Environmental awareness				
		Cultural awareness training				
Notifications to community and other stakeholders	ACR with approval by the District Manager	Role based decision				
Hazardous Tree	Suitably qualified	Mandatory qualifications				
Felling	Parks Victoria Staff member from local or	 Advanced Faller consistent with DEECA / Parks Victoria fire qualifications framework 				
	nearby teams (e.g.	• First Aid				
	Ranger, FSO, RTLJ.	Manual Handling				
		 Hazard Awareness training supporting the Draft Tree Risk Strategic Approach and incorporating Electrical asset identification. 				
		 Other relevant but not essential qualifications Certificate II ESI Powerline Vegetation Control 				
		Working Safely in the Construction Industry				
		 Working safely near live electrical apparatus; non-electrical worker 				
		Traffic management				
		Operate woodchipper and plant				
		Application of pruning techniques and standard				
		Chemical use and application				
		Cultural awareness training				
		Environmental awareness				

Vegetation Management Task	Parks Victoria Role	Qualifications specific to line clearances				
Tree waste Disposal (Mechanical preferred) [See Note]	Suitably qualified Parks Victoria Staff member from local or nearby teams (e.g. Ranger, FSO, RTL).	 Mandatory qualifications Operate woodchipper and plant Safe work practices specific to the chipper Chainsaw operations (e.g. 'Trim and Crosscut' Certificate I) or similar levels of training and experience Hazard Awareness training supporting the Draft Tree Risk Strategic Approach and incorporating Electrical asset identification. First aid Manual handling Other relevant but not essential qualifications Certificate II ESI Powerline Vegetation Control Working Safely in the Construction Industry Working safely near live electrical apparatus; non-electrical worker 				
		 Chainsaw operation Application of pruning techniques and standards Operate woodchipper and plant Safe Work Practices First aid Traffic management Environmental awareness Cultural awareness training 				
Traffic Management in area of Operations	Contractor preferred for all operations near roading.	 Mandatory qualifications Traffic control training consistent with competency requirements specified for RIIWHS205E - Control Traffic with Stop-Slow Bat. Other relevant but not essential qualifications Training consistent with the competency outcomes from RIIWHS302E: Implement Traffic Management Plan. Must be delivered by a registered training organisation. Hazard Awareness training supporting the Draft Tree Risk Strategic Approach and incorporating Electrical asset identification. First aid Manual handling 				
Post Works Audit	ACR or delegate. Or Contract Supervisor	 Mandatory qualifications Relevant industry workplace experience or mentoring. Manual Handling Other relevant but not essential qualifications Certificate II ESI Powerline Vegetation Control Working Safely in the Construction Industry Working safely near live electrical apparatus; non-electrical worker 				

Vegetation Management Task	Parks Victoria Role	Qualifications specific to line clearances
		Chainsaw operation
		Application of pruning techniques and standards
		Operate woodchipper and plant
		Safe Work Practices
		First aid
		Traffic management
		Environmental awareness
		Cultural awareness training

8.2 Qualified Persons taking part of Electric line clearance operations

Table 8 – Roles and responsibilities for line clearance operations

Vegetation Management Task	Parks Victoria Role	Qualifications specific to line clearances
Electric line clearance operations and observers	External 'third parties' preferred for these operations where practicable. OR Parks Victoria staff with access to equipment and experience using elevated work platforms.	 UET20319 - Cert II ESI Powerline Vegetation Control elective units - Mandatory qualifications Elevated Work Platform Operator and EWP Safety Observer UETTDRVC33 - Apply pruning techniques to vegetation control near live electrical apparatus UETTDRVC25 - Use elevated platform to cut vegetation above ground level near live electrical apparatus TLILIC0005 - Licence to operate a boom-type elevating work platform (EWP licence) Tree Climber and Climber Safety Observer UETTDRVC21 - Use climbing techniques to cut vegetation above ground near live electrical apparatus UETTDRVC23 - Apply pruning techniques to vegetation control near live electrical apparatus UETTDRVC34 - Undertake release and rescue from a tree near live electrical apparatus UETTDRVC34 - Undertake standard climbing techniques Training Currency The Regulations require qualified persons to complete annual refresher training to maintain currency Other relevant but not essential qualifications First aid Manual handling Chainsaw operation Application of pruning techniques and standards Working Safely in the Construction Industry Traffic management Operate woodchipper and plant
		Operate woodchipper and plantChemical use and application.

Vegetation Management Task	Parks Victoria Role	Qualifications specific to line clearances
		Environmental awarenessCultural Awareness Training

Note: The disposal of vegetation using chipping is preferred over burning or leaving the materials to decompose naturally as it reduces fuel for bushfires, provides better access and occupational health and safety outcomes during operations.

The District Manager, in consultation with relevant staff, may approve staff to perform a function for which their qualifications differ the table above, where that person does not act as a 'qualified' person (e.g., 'ordinary' person). The decision criteria is based on guidance from the Energy Safe Victoria <u>2022 Blue Book</u>:

- Working knowledge of the relevant sections of the Electric Line Clearances Code and AS 4373
- Knowledge of communication processes required (e.g., Notifications) and dispute resolution.
- Knowledge of the relevant approved Parks Victoria procedures.
- A knowledge of the consequences of any physical effort required to perform the tasks specified including method selection and equipment required.
- A working knowledge and skill associated with the relevant: forms and documentation
- Risk assessment methods and documentation requirements
- Work practices
- Equipment and plant
- Internal Reporting requirements.
- Demonstration of acquired knowledge in the field setting.
- An appreciation of the growth habits of the local vegetation and prevailing weather conditions.

IMPORTANT NOTE: To remove all doubt, any persons operating as "qualified persons" must hold the current training in compliance with the Energy Safe Victoria training approval statement.

8.3 Additional Requirements for Contractors

Parks Victoria shall ensure that all Contractors engaged to support activities under or near POELs comply with stipulated training requirements (including confirmation of training currency) and incorporate this requirement into the tender evaluation process. Contractors must be engaged using the Parks Victoria's PRO-142 Procurement Procedure.

The procurement procedure includes details the process for tendering works and awarding a contract which extends to skills and equipment capabilities consistent with the identified scope of work. The procedure also details corrective actions for non-conformances and termination arrangements should that be deemed necessary.

8.4 Managed Work Areas Specific to Powerlines

Staff are not permitted to perform tasks in close proximity to power lines unless suitably qualified, as assessed using the training matrix provided here. In addition, workers performing vegetation management works must establish a work exclusion zone at all points of entry (Park visitor access included) to the area where vegetation is being managed.

Any person not authorised to enter the controlled work area must be asked to leave the restricted zone due to the risk posed by the activities (e.g. tree works) and the energised power lines themselves. Staff refusing to adhere with requirements should be managed using disciplinary processes through their line Manager.

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This Management Plan requires that no 'ordinary person' approach a powerline conductor regardless of its design or ownership or operate mobile equipment (e.g. ride-on mower) at a distance of less than that specific in table below. In cases where doubt exists of the supply voltage, it must be assumed as being high voltage (66 kV+). Risk Assessments by staff working near power lines must reference the discussion below.

8.5 Minimum Powerline Offset Distances

The Energy Safe Victoria 2022 Blue Book provides workers with the means of reducing the safety zones specified above, as detailed in regulation 616 of the *Electricity Safety (General) Regulations 2019*. It differentiates between an 'ordinary' person and one who is 'qualified' and permitted to approach powerlines at reduced distances. The table below details the minimum separation distance an 'ordinary' person must maintain for all activities near any power lines (vertically below (COLUMN B) and all other axes (COLUMN C).

Table 9 - Minimum separation distance an 'ordinary' person must maintain for any powerline regardless of its ownership or location for any works associated with vegetation management work.

Type of Aerial Conductor (Power Line voltage)	COLUMN 'B' Distance an 'Ordinary' Person must maintain at all times vertically below the conductor	COLUMN 'C' Distance an 'Ordinary' Person must maintain at all times around the conductor other than
Insulated low voltage conductors	100mm (10cm)	300mm (30cm)
Bare or covered low voltage conductors	1000mm (1m)	3000mm (3m)
High voltage conductors U ≤ 66 kV	2000mm (2m)	4000mm (4m)
High voltage conductors 66 kV < U ≤ 500 kV	6000mm (6m)	8000mm (8m)

NOTE: A 'qualified' person is one who holds a current certificate that is approved by Energy Safe Victoria specifying satisfactory completion of a training course in tree clearing.

9 Additional matters included in this Management Plan

9.1 Alternative compliance mechanism in respect of which the responsible person has applied, or proposes to apply, for approval under clause 31 of the Code

Parks Victoria does not currently use any alternative compliance mechanisms and does not foresee it will in the future, however this forms part of the annual management review.

The absence of a requirement for alternative compliance means that the details for approving the alternative compliance mechanism are not required either.

Parks Victoria does not apply an alternative mechanism for compliance and adopts the following principles for line clearances, across all powerlines it manages and removes vegetation such that:

- No Exception to minimum clearance space for structural branches around insulated low voltage electric lines.
- No Exception to minimum clearance space for small branches around insulated low voltage electric lines.

- No Exception to minimum clearance space for small branches below uninsulated low voltage electric lines in low bushfire risk areas.
- No Exception to minimum clearance space for structural branches around uninsulated low voltage electric lines in low bushfire risk areas.

9.2 A description of the measures that must be used to assess the performance of the responsible person under the management plan

Parks Victoria as part of its annual review will use the following measures to assess its performance in delivering and adhering to the processes and procedures outlined in the Management Plan:

- The number of trees found in breach of the Code during the annual survey.
- A comparison of the number of trees cleared that meet versus do not meet the Code.
- The number of trees cleared to each pruning cycle and the average pruning cycle.
- The number of pruned trees found to be below AS 4373-2007.
- The number of requests for electric line clearance pruning from electricity Distribution Company.
- The number of community complaints.
- The number of business cases developed for alternative approaches to normal pruning.

Records of the above will be kept by Parks Victoria for a minimum of five years.

9.3 Details of the audit processes that must be used to determine the responsible person's compliance with the Code.

Parks Victoria uses the services of a 'third-party' contractor to undertake the initial Audit and Electric Line Clearances works, the Parks Victoria Project Manager will confirm that Electric Line Clearances have occurred in accordance with this Management Plan. The scope of work includes confirming:

- Timing of Electric Clearance Inspections corresponds to schedules documented in Section 6.4 *Timing of Works*.
- Lodge request to Managing Country Together Aboriginal Heritage Assessment System
- Values checks (e.g., Cultural Heritage) have occurred prior to vegetation being removed or modified.
- Vegetation Management notifications have been provided to relevant stakeholders and complaints (if any) addressed.
- Workers performing a task associated with Electric Line Clearances have relevant qualifications and experience (both staff and contractors).
- Identified works have occurred within stipulated timeframes and in accordance with the specification.
- Works are verified by the Parks Victoria Project Manager after works complete for conformance with the specification
- The Management Plan (this document) is consistently applied across the Park Estate.

The purpose of this audit is to confirm that all requirements outlined in this Vegetation Management Plan are being met, non-conformities with the Code is identified and promptly resolved and that the Management Plan itself is effective in managing the POELs.

Parks Victoria representatives will be provided findings from the third party and issues or non-conformances at monthly meetings, or as required as part of Park planning processes.

Where remedial action is required, it can be actioned by Parks Victoria staff or a contractor, but the work shall be dealt with as soon as possible. Where assistance is required by others such as the distribution company, then a consultation process shall be used to assist in attending to the non-compliance as soon as possible.

Following investigation of the non-compliance and the establishment of the cause, the importance of compliance with the management plan and the code will be drawn to the attention of the persons concerned.

Performance management uses a three strikes approach:

- 1. First Occasion Verbal instruction and the incident recorded on file.
- 2. Second Occasion Notification shall be in writing, and the incident recorded on file.
- 3. Third Occasion Training program will be reviewed, and more serious action (e.g., termination) considered if it is the same offender for a 'high consequence' non-compliance

9.4 Publishing the Plan on the Parks Victoria Website

The responsible person will ensure that the approved and updated plan be available and published on Parks Victoria's website by 1 July each year for staff to view.

APPENDIX 1 - Parks Victoria Private Overhead Electric Lines

				Distribution Pole / POEL Identification	Ground					Is Electric line >45 metres	Is electric line >100 metres		In Bushfire Management Overlay? High Bushfire Risk Area (HBRA) or Low		
			Park Name	Numbers	Conditions			Voltage	Primary Material	between poles	between poles		Bushfire Risk Area (LBRA)	lat	long
PV Asset	Parks Vic Ref	AGS ID 🔻	Site ID	Pole Number	Difficult Acc -	Line Directi 🔻	Owner 🚽	Туре	Pole material	Span dist >4 +1	Span dist >10 🔻	Span lengt 🔻	Risk 🔻	Y Ŧ	X
105793	Albert Park #12 - 16	681	Albert Park	Not known.	No	W	Parks_Vic	Service	N/A	No	No	Less than 45m	LBRA	-37.84851974	144.9770602
105794	Albert Park #12 - 16	682	Albert Park	Not known.	No	N	Parks_Vic	Service	N/A	No	No	Less than 45m	LBRA	-37.84857701	144.9767602
105/90	Albert Park #12 - 16	070	Albert Park	Not known.	NO	W	Parks_Vic	Service	N/A Timber	NO	No	Less than 45m	LBRA	-37.8491394	144.965/931
103637	Dandenong Valley	6/3	Dandenong Valley	00	-	vv	Parks_VIC	Service	Timber	NO	NO	Less than 45m	IDKA	-57.90782851	144.2044000
105804	Parklands #7 - 11	701	Parklands	9914961		E	Parks_Vic	Service	N/A	No	No	Less than 45m	HBRA	-37.87995217	145.1995257
105806	Dandenong Valley Parklands #7 - 11	705	Dandenong Valley Parklands	9885635		w	Parks_Vic	Service	N/A	No	No	Less than 45m	HBRA	-37.8986907	145.1907471
105864	Mount Buffalo #2 - 4	903	Mount Buffalo	No number	No	E	Parks_Vic	Service	Steel	No	No	Less than 45m	HBRA	- 36.7256407636 483	146.802330026 355
105866	Mount Buffalo #2 - 4	931	Mount Buffalo	4	No	s	Parks_Vic	LV	Steel	No	No	Less than 45m	HBRA	- 36.7219752545 003	146.819113081 027
105860	Mount Buffalo #2 - 4	886	Mount Buffalo	No number	No	SE	Parks_Vic	LV	Steel	No	No	Less than 45m	HBRA	- 36.720287 <mark>846</mark> 4 071	146.816869341 874
105861	Mount Buffalo #2 - 4	887	Mount Buffalo	No number	No	SE	Parks_Vic	LV	Timber	No	No	Less than 45m	HBRA	- 36.7205869424 542	146.816950715 764
105849	Discovery Bay #44	860	Discovery Bay	No number		SE	Parks_Vic	LV	Timber	Yes	No	>45m	HBRA	-38.31915101	141.4041576
105865	Mount Buffalo #2 - 4	923	Mount Buffalo	5	No	s	Parks_Vic	LV	Timber	Yes	No	>45m	HBRA	- 36.7214883840 331	146.818562584 437
105867	Mount Buffalo #2 - 4	935	Mount Buffalo	6	No	s	Parks_Vic	LV	Timber	Yes	No	>45m	HBRA	- 36.7211546657 852	146.818121452 344
105862	Mount Buffalo #2 - 4	888	Mount Buffalo	No number	No	SE	Parks_Vic	LV	Timber	Yes	No	>45m	HBRA	- 36.7206215460 994	146.817332579 709
105863	Mount Buffalo #2 - 4	889	Mount Buffalo	No number	No	SE	Parks_Vic	LV	Timber	Yes	No	>45m	HBRA	- 36.7206828363 553	146.817860755 859
105833	Werribee Park #17 - 18	741	Werribee Park	1083		sw	Parks_Vic	Service	N/A	Yes	No	>45m	LBRA	-37.92495535	144.6675621

APPENDIX 2 – Example Work Instruction Sheet

Vege	getation Management Form Work Instruction Sheet											VICTORIA									
	Voor					Foodor									Inc	nactor	lamo		F	Presummer / LE	BRA Cyclic / HBRA Cyclic
	Date				Si	Innressi	nns									pector	vanie				
	Date	 I	1			1	1			1	1	1		1				1	r	- I .	1
	oN doL	LIS Number	Address	Tree Owner	Notice given	Map Ref	Current Code	Voltage	Ver. Clearance	Hor. Clearance	Species	Removal Light	Removal Med	Trims	Plant Req.	Est Mins	Date Cut	Code Left	GPS Ref - SOUTH	GPS Ref - EAST	Comments
r park	1	36062	Albert Rd	PV	No. Date	57 J2	55	SW	1.5	1.5	ASH			1	PS	20		15.0	37.83715	144.96892	Small Ash, Pole saw next to ticket machine
ALBER'	2	36114	Albert Rd	PV	No.	57 J2	56	sw	2.0	2.0	EUC			1	EWP 14m	30		15.0	37.83720	144.96921	
	3	36111	Albert Rd	PV	No.	57 J2	56	22	2.5	2.5	РОР			3	EWP 14m	60		15.0	37.83695	144.96982	Trim 3 Poplars next to path
	4	36112	Albert Rd	PV	No. Date	57 J2	56	LV HV		3.0	РОР			1	EWP 14m	30		15.0	37.83686	144.97002	Clear conductors and dead top
	5	36108	_ Albert Rd	PV	No. Date	57 J2	56	н∨	3.0	3.0	РОР			4	EWP 14m	80		15.0	37.83666	144.97031	
	6	52595 9361	Albert Rd	PV	No. Date	57 J2	56	HV	3.0	3.0	ELM			3	EWP 14m	60		15.0	37.83621	144.97107	3 Trims at girls school
	7	37327	Queens Rd	PV	No. Date	58 - A6	55	ABC	2.5	2.5	СҮ			1	EWP 14m	30		16.0	37.84850	144.97681	Cypress at golf course entrance
	8	No LIS	Queens Rd	PV	No.	58 A6	55	sw	1.0	1.0	EUC		<u> </u>	2	EWP 14m	50		15.0	37.84851	144.97673	2 Euc's in golf course car park
		Lights			Date																



APPENDIX 3 - Parks Victoria - Audit Template

WORKERS______

WORKPLACE AUDIT

AUDITORS

NAME_____DATE_____

LOCATION_____

ITEM	Yes	No	Comments
Was your entry to the job site controlled?			
Risk assessment signed & have you been requested to sign on?			
Is the Safety Observer being used/required?			
Have areas of significant vegetation been identified?			
Is the site reasonably tidy?			
Is traffic control appropriate?			
Are workers maintaining limits of approach?			
Are Park visitors excluded from the work area?			
Are all workers using correct PPE?			
Is the Drop Zone being maintained by all workers			
Are vegetation clearances achieved adequate / excessive?			
Do cuts appear, correct?			

Comments:

Has a Non-Conformance has been identified Please complete Conformance sheet	□ YES	\Box NO (immediate action required)
Has an Improvement been identified Please complete Conformance Sheet	□ YES	\Box NO (immediate action required)
Auditor Signature		
Team Leaders Signature		



APPENDIX 4 – Example Template – Private Overhead Electric Lines Conformance Record

This template should be used as a record of any identified works which occur on POELs managed by Parks Victoria at the identified Park supplementary to the record on the asset management system itself. This forms part of the audit process.

Attribute Name	Sample Data
Asset Num	
Parks Vic Ref	Mt Buffalo#2 - 4
Genus / Species	Eucalyptus cypellocarpa
Common Name	Mountain Grey Gum
Height	10
Width	06
DBH	58
Health	Good
Structure	Poor
Maturity	Mature
Defect of Concern	Encroaching into clearance space
Tree Part of Concern	Branch
Key Target	Line
Likelihood of Failure	Possible
Likelihood of Impact	Low
Consequences of Failure	Minor
Risk	Low
WorksReq	Powerline clearance
Site ID	Mt Buffalo
Notes Arb	Prune to ensure clearance of line. One branch above line to be addressed.
Hazardous tree habitat	No
Distance to conductor	1
Difficult Access	No
HBRA or LBRA	HBRA
Y	146.81853372606
Х	-36.7214685798875
Associated Pole	Pole ID 988 Owner: Parks Victoria (PV)
Owner	PV
Project Manager Review	Approved by Indrajit Ghosh
ACR Review	Approved by Julien Atherstone
MCT Review	Approved

Figure 3 – Sample data collected using GIS Mapping software to display vegetation management works, POEL assets and any special requirements (e.g. areas of significant vegetation to be protected) <u>https://erqon.maps.arcqis.com/apps/webappviewer/index.html?id=5a53f6f37db84158930f9909e4d30286</u>



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