



TIMBER TOWNS VICTORIA

A Local Government Association

ERAC's consultation on the proposed Improved Forest Management in Multi-use Public Native Forest (INFM) method.

Timber Towns Victoria Submission

30 January 2026

Timber Towns Victoria welcomes the opportunity to provide a submission to ERAC's consultation on the proposed Improved Forest Management in Multi-use Public Native Forest (INFM) method.

Timber Towns Victoria (TTV) is an incorporated Victorian Local Government Association, representing the interests of municipal councils in relation to forests and forestry matters.

TTV's primary function is to provide a forum for local government to address the management of forests and forest industries and their impact on our local communities.

TTV is an effective advocacy body that represents our members from towns and cities across Victoria and encompasses a substantial local government area within Victoria where these local Government areas are responsible and accountable to the residents of their respective councils. Our effectiveness is based on being a peak organisation and acting as a voice for these communities advocating to both the Federal and Victorian State Government on policy and legislation that impacts communities.

We support the development of carbon methods for native forest management that ensure carbon benefits are appropriately recognised and backed under the ACCU scheme, however there are concerns that the 'Improved Native Forest Management in Multiple-use Public Native Forests' (INFM) Method proposal does not consider all opportunities to maximise carbon capture and storage from native forests limiting operational scope and practical application.





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Although the proposed INFM Method allows a project proponent to impose a temporary moratorium on timber harvesting while the feasibility of its ACCU project is assessed, TTV believes that a moratorium should not be automatically considered a change to business-as-usual (BAU) as it is highly context dependent. This should be assessed case by case, based on the legal, policy and management settings that were in place prior to the project, rather than assuming all moratoria are inherently temporary or permanent.

Any assessment of carbon abatement benefits should be underpinned by transparent and conservative assumptions, with a clear distinction between changes driven by policy and those driven by the project itself.

There should be clearer guidance in the method to reduce ambiguity and improve consistency across projects.

TTV recognises that leakage is often beyond the direct control of a project proponent. However, the method does not sufficiently account for leakage linked to increased reliance on overseas or interstate imports or the substitution of timber with higher-emission non-wood products, leaving a significant gap in the overall abatement assessment.

Evidence based leakage estimates in Australia are largely not documented and it can be suggested that further independent research is required in this area.

TTV agrees that a substantial investment in improvements to current data collection and tracking of harvest volumes in ascertaining leakage on private native forest harvesting is necessary to ensure leakage is accounted for correctly.

TTV believes it is vital that the proposed INFM Method remains robust and adaptable as regulatory frameworks evolve, while avoiding retrospective changes that could undermine investment certainty or the credibility of the method.





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TTV strongly supports the response made by The Institute of Foresters Australia trading as Forestry Australia regarding the proposed Improved Native Forest Management in Multiple-use Public Native Forests Method (INFM Method). In summary, The proposed INFM Method:

- excludes many activities which would support the active and adaptive management of forested areas and maximise carbon and climate mitigation outcomes.
- does not adequately address key integrity risks, and/or there is not enough information to discern how the Method would operate on a practical level.
- has potential significant adverse social and economic outcomes that could foreseeably result from the proposed Method not effectively considered.
- does not provide a framework for native forests to participate in the carbon market in a more holistic or inclusive way.
- precludes the application of alternate beneficial management creating sub-optimal carbon abatement outcomes.

TTV supports Forestry Australia's view on sustainable harvesting of native forests, and the clear evidence that well managed forests are essential to delivering long term climate benefits as outlined in the recent publication [Forest Carbon Balance Evidence Review](#).

Thank you for considering Timber Towns Victoria's submission to the proposed INFM Method.

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