# Class 19 AAs: Phase 3 Khapra beetle requirements and non-compliance relating to Khapra beetle measures webinar

Program overview transcript

(Duration 30 mins 12 secs)

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## Introduction

This is the transcript of a webinar information session, presented by the Department of Agriculture, Water and the Environment. The purpose of this session is to inform Industry of the recent Phase 3 changes to the class 19 Approved Arrangements and common non-compliance under the Class 19 AAs in relation to Khapra beetle measures.

## Transcript

[Webinar begins]

[Slide: Title]

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Denise Thomas: Welcome to today's industry information session regarding recent non-compliance detected under the Class 19 Approved Arrangements. We will also discuss the phase 3 requirements for high-risk plant products to protect against khapra beetle.

My name is Denise Thomas. I'll be your facilitator for the information session today.

Before we begin, I would like to acknowledge the Traditional Custodians of the land on which we gather today and pay my respects to their Elders past and present. I extend that respect to Aboriginal and Torres Strait Islander peoples here today.

This information session is **not** a mandatory, continued biosecurity competency session but rather an opportunity to provide feedback on the changes that have occurred with the introduction of khapra beetle urgent actions and provide an update on the most recent phase 3 changes to the class 19 Approved Arrangements.

We'll be recording today's information session and a copy of the recording will be made available through the [Automatic Entry Processing](https://www.agriculture.gov.au/import/arrival/arrangements/automatic-entry-processing-aep) webpage. This will allow you to view the session again or act as a resource if you wish to recheck the information at some stage.

We will take questions relating to today’s topics at the end of the information session, so feel free to post those in the Q and A box at the side of your screens.

I'd like to introduce you to our team who will be presenting today.

They are Mark Sobey: Director Assessment Policy, Cargo and Conveyances Branch, Denise Thomas: Assistant Director, Katya Guerra, Maresa Withy and Kym Kunze - Senior Policy Officers. Mark, Katya, Maresa, Kym and I are part of Assessment Policy, Cargo and Conveyances Branch, Biosecurity Operations Division. We also have Robert Douros from Compliance Partnerships with us today. Robert will be able to answer any questions you may have regarding treatments.

So, let's get started by taking a closer look at why we are here today. Mark will give us some more information.

Denise Thomas: Thanks Mark

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Mark Sobey: Thanks Denise. Today’s session will provide you with information regarding recent phase 3 changes to the Class 19 Approved Arrangements and feedback regarding recent non-compliance detected from our verification activities. This feedback will focus on non-compliance found on treatment certificates relevant to Khapra beetle measures.

As you would be aware, the first stage of the phase 6A urgent actions for sea containers, targeted FCL/FCX containers packed with high-risk plant products in a country that has khapra beetle. This introduced the requirement for these containers to be treated offshore, using an approved treatment option, and accompanied by a valid treatment certificate.

The second stage targeted FCL/FCX containers packed in a country that has khapra beetle and will be unpacked in a rural grain growing postcode. These containers also required offshore treatment, using an approved treatment option, and accompanied by a valid treatment certificate. Feedback from these requirements will be discussed in more detail today.

Denise Thomas: Thanks Mark. Katya will now discuss the requirements for phase 3 khapra beetle measures.

Denise Thomas: Thanks Katya.

[Slide 4]

Katya Guerra: Thank you Denise.

As of 30 September 2021, import conditions for high-risk plant products imported via commercial pathways have changed.

These conditions apply to air freight and sea freight, including LCL and FCL/FCX.

The conditions vary depending on whether the country of export for the products is a [khapra beetle risk country](https://www.agriculture.gov.au/import/arrival/pests/khapra_beetle) or not.

On this slide, we can see that high-risk plant products exported from a khapra beetle country, require offshore treatment as well as a phytosanitary certificate. If the high-risk plant product is an in-scope commodity, it is available to be managed through your AEPCOMM approved arrangement.

Also remember that if the products are packed into an FCL/FCX, the container must also be treated as per Phase 6A requirements.

For high-risk plant products exported from a non khapra beetle risk country, a phytosanitary certificate is required.

In addition to requiring a phytosanitary certificate, high-risk plant products exported from [khapra beetle risk countries](https://www.agriculture.gov.au/import/arrival/pests/khapra_beetle) must also be treated offshore, and the treatment must be completed within [21 days of export](https://www.agriculture.gov.au/pests-diseases-weeds/plant/khapra-beetle/high-risk-plant-products#timeframe-between-treatment-and-export).

Approved treatment options are methyl bromide fumigation and heat treatment. Controlled atmosphere treatment has been identified as an alternative treatment option, but as this treatment requires an import permit, it’s out of scope for AEPCOMM.

Back to you Denise.

Denise Thomas: Thanks Katya.

Maresa will now provide us with information regarding the additional phytosanitary certificate declarations required for in scope AEPCOMM commodities. Thanks Maresa.

[Slide 5]

Maresa Withy:

The declarations required on the phytosanitary certificate are dependent on the treatment type used to treat the products.

For methyl bromide fumigation the high-risk plant products must be:

* fumigated offshore with methyl bromide at the appropriate khapra beetle rate as identified in BICON and
* accompanied by a methyl bromide treatment certificate and
* accompanied by a phytosanitary certificate.

The additional phytosanitary certificate declarations required are:

“The goods were fumigated with methyl bromide in accordance with Australia’s Methyl Bromide Fumigation Methodology as per the attached methyl bromide treatment certificate.”

**AND** required is one of the following declarations:

“The goods were fumigated in gas permeable packaging” or

“The goods were fumigated prior to packing” or

“Impermeable packaging was open during fumigation”

**Please Note:** Certificates containing more than one of the mentioned packaging declarations will not be accepted.

**AND the final additional declaration required is:**

“Following treatment, representative samples were inspected and found free from all live species of Trogoderma.”

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For dry heat treatment the high-risk plant products must be:

* heat treated offshore at a minimum temperature of 60°C for 120 minutes, measured at the core of the goods, and
* accompanied by a heat treatment certificate, and
* accompanied by a phytosanitary certificate.

The treatment and treatment certificate must meet the requirements of the [Heat Treatment Methodology](https://www.agriculture.gov.au/import/arrival/treatments/treatments-fumigants#heat-treatment).

**Please Note that** the heat treatment rate (60°C for 120 minutes) applies to **high-risk plant products only**. The khapra beetle heat treatment rate for **sea containers** is 60°C for 180 minutes, as detailed on the [sea containers webpage](https://www.agriculture.gov.au/pests-diseases-weeds/plant/khapra-beetle/sea-container-measures).

If using heat treatment, the container must be treated prior to the loading of goods.

The additional phytosanitary certificate declarations required are:

1. “The goods were treated by a Department of Agriculture, Water and the Environment approved treatment provider in accordance with Australia’s heat treatment methodology as per the attached heat treatment” and
2. “Following treatment, representative samples were inspected and found free from all live species of Trogoderma.”

Just a reminder that controlled atmosphere treatment has been identified as an alternative treatment option but is out of scope for the class 19.2 AEPCOMM Approved Arrangement.

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For high-risk plant products exported from **non khapra beetle** risk countries, a phytosanitary certificate is required that includes this additional declaration:

“Representative samples were inspected and found free from evidence of any species of *Trogoderma* (whether live, dead or exuviae) in [Australia’s list of Trogoderma species of biosecurity concern](https://www.agriculture.gov.au/node/9259#trogoderma-species-of-concern)*”.*

Thanks Denise.

[Slide 8]

Denise Thomas:

The permitted commodities for class 19.2 AEPCOMM that are in-scope for phase 3 khapra beetle measures are Milled rice for human consumption and Processed grain and seed products for human consumption.

The AEPCOMM pathways for these commodity groups are FCL’s from all countries.

You must also remember that if the products are packed into an FCL/FCX, the container must also be treated as per Phase 6A requirements.

Katya will now discuss changes to the import conditions for parboiled rice using the BICON rice case.

Katya Guerra:

[Slide 9]

Thank you.

The Rice for human consumption BICON case has been updated to reflect changes to the import conditions for high-risk plant products imported via commercial pathways.

One of the changes to the case involves the review of the import conditions for parboiled rice from all countries.

It’s important for you to note that tariffs included in AEPCOMM are limited to white milled rice, these are tariffs 1006.30 and 1006.40. Other varieties of parboiled rice are currently out of scope of the arrangement, but they are being considered for possible inclusion later on.

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The new import conditions apply to all types of parboiled rice.

Parboiled rice is husked or milled rice that has been soaked in water and subjected to a heat treatment so that the starch is fully gelatinized, followed by a drying process.

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FCL consignments of wholly milled or broken parboiled rice (imported under tariff codes 1006.30 and 1006.40) are included in the Automatic Entry Processing for Commodities approved arrangement.

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To demonstrate compliance with this requirement you must present evidence that the rice is parboiled either on a commercial invoice, manufacturer's declaration, or commercial product label. Another important thing to note is that parboiled rice is excluded from the current khapra beetle requirements.

Back to your Denise.

Denise Thomas: Thanks Katya.

Maresa will now discuss some common non-compliances that have been detected under the Class 19 Approved Arrangements requirements for khapra beetle treatments.

[Slide 13]

Thank you.

With phase 3 khapra beetle urgent actions for high-risk plant products being introduced, we thought it was an opportune time to share some of the learnings related to treatment certificate compliance that we identified during phase 6A of the urgent actions for sea containers.

Our Compliance Partnerships team continue to proactively engage offshore treatment providers in relation to non-compliance with the treatment methodologies to improve this compliance. To close the loop, we would like to make you aware of some of the common non-compliance being detected on offshore treatment certificates and some areas to pay attention to when assessing offshore treatment certificates under the class 19 arrangements.

Most non-compliances detected are in relation to methyl bromide fumigations.

We know that treatment rates to manage the risk of khapra beetle are different to treatment rates used to manage other types of biosecurity risk.

For methyl bromide fumigation, containers can be treated after packing. If treating the goods and the container at the same time, the highest dose, duration, temperature, and end point must be met.

The khapra rate is a dose of 80 grams per cubic metre³ or above, at 21°C or above, for a minimum of 48 hours, with an end point reading of 20 grams per cubic metre³ or above.

BICON import conditions will include a table detailing the requirements.

The fumigation must be undertaken in a chamber or sheeted enclosure in accordance with all the requirements in the Methyl Bromide Fumigation Methodology.

Remember to always refer to BICON for specific import conditions for your consignment.

Some of the recent common non-compliances include:

The incorrect treatment rate for khapra beetle – often we have seen instances where the lower timber rate has been applied.

And the incorrect treatment method for khapra beetle – for example an unsheeted container instead of chamber or sheeted container

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For a heat treatment the container must be treated prior to the goods being loaded into the container.

There must be evidence that the sea container has been heat treated in a chamber or sheeted enclosure at 60°C or higher for a minimum of 180 minutes prior to packing.

Your BICON import conditions will detail the specific requirements. The heat treatment must be conducted in accordance with the [Heat Treatment Methodology](https://www.agriculture.gov.au/node/3139#heat-treatment).

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For insecticide spray treatment the container must be treated prior to the goods being loaded into the container also.

There must be evidence that the internal and external underside of the floor, the internal and external lower portion of the three walls and doors up to 1m, and the door seals of the sea container have been treated with a suspension concentrate containing the active constituent deltamethrin in accordance with the [Insecticide Treatment Methodology](https://www.agriculture.gov.au/import/arrival/treatments/treatments-fumigants#insecticide-treatment).

The treatment must be applied at a rate of 1 litre spray solution per 20 metres squared, with a concentration of 0.03% or above, applied as a coarse spray of 350 to 400 microns.

Your BICON import conditions will detail the specific requirements.

Thanks Denise.

Denise Thomas: Thanks Maresa.

Katya will provide us with some further information regarding recent non-compliance detections.

Thanks Katya.

[Slide 16]

Katya Guerra: Thank you.

Another area of non-compliance for all treatment types is that some treatment certificates are not meeting the overarching and prescribed documentation requirements as detailed in the Minimum documentary and import declaration requirements policy.

Examples of non-compliance in this area would be, incorrectly signed or dated certificates and certificates without an acceptable letterhead or ones without the container number linking the treatment to the specific container. So, when assessing documentation for treatments please ensure you do refer to this policy.

We also have certificate templates our website to assist you.

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Another area of concern that we have identified is AEI numbers not being entered, or being entered incorrectly, when lodging your import declarations.

You are required to enter an entity identifier, or AEI number for all treatment certificates issued for khapra beetle container treatments, including those issued by non-registered treatment providers.

We have developed an [AEI reporting infographic](https://www.agriculture.gov.au/sites/default/files/documents/aei-reporting.pdf) to assist you with determining the offshore providers AEIs (you can find these on our website).

Treatment certificates issued by registered treatment providers have an AEI number listed on the certificate. In these cases, you are required to select the appropriate AEI code in ICS or third-party software.

Treatment certificates issued by non-registered treatment providers do not have an AEI on the certificate. In these cases, you are required to reference the offshore treatment providers webpage and enter a generic AEI based on the country and treatment type. In cases where a specific treatment provider is listed as ‘not acceptable’ they will be allocated a specific code to enter.

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When assessing treatment certificates, the sea container must be treated offshore (within 21 days prior to export) to ensure it is free from khapra beetle.

To demonstrate compliance with this requirement you must present evidence that the date of export or the date of container sealing is within 21 days of the date of container treatment (as indicated on the treatment certificate).

We have developed a number of treatment infographics and they are available as a resource on our website to assist with the treatment assessment.

Thank you, Denise.

Denise Thomas: Thanks Katya.

[Slide 19]

Katya Guerra: Thanks Denise.

That draws to a close the formal part of the presentation, but we now would like to take any questions that you have and if you have entered them or want to enter them into the live Q and A on the side of your screens.

I just like to ask Kym, do we have any questions Kym that are being presented?

Kym Kunze: Yes. Thank you, Denise.

Q: Is brown parboiled rice in scope of AEPCOMM?

Katya Guerra: I’ll take that one Denise.

As I mentioned before, at this stage only consignments of white rice can be lodged through AEPCOMM. This also applies to parboiled rice – the only parboiled rice that you can processed under AEPCOMM is white parboiled rice under tariffs 1006.30 and 1006.40. Other varieties of parboiled rice are currently out of scope of the arrangement, but we are considering adding those onto the arrangement, and we will let you know when that happens.

Denise Thomas: Thanks Katya. Kym, are there any other questions?

Kym Kunze: Yes.

Q:  If the consignment was treated via heat treatment, the duration for the high-risk plant products is different to the required duration for the container, is this right?

Maresa Withy: I can take that one Denise.

Yes, that is right. Phase 3 requires high risk plant products to be treated at 60deg for 120 mins whilst measures implemented in phase 6a require the sea container to be treated at 60deg for 180 mins. So, if using heat treatment for the sea container you will also need to remember that the container needs to be treated prior to packing/loading of goods.

Thanks Kym.

Denise Thomas: Kym, do we have any more questions?

Kym Kunze: Yes, one more question.

Q: Will the information session be recorded and where can I view it?

Denise Thomas: I can answer that one Kym.

Yes. the session is being recorded today and will be available on our [Automatic Entry Processing](https://www.agriculture.gov.au/import/arrival/arrangements/automatic-entry-processing-aep) webpage, so that you are able to review it and look at any details that you want to follow up on.

Any other questions Kym?

Kym Kunze: No, that’s all. Thank you Denise.

Denise Thomas: Thanks for that.

[Slide 20]

We would just like to thank everyone who has participated today. I believe that covers all the topics that we wanted to discuss.

As I just mentioned, the information session will be recorded and will be available on the [Automatic Entry Processing](https://www.agriculture.gov.au/import/arrival/arrangements/automatic-entry-processing-aep) webpage.

If you do have any other questions you want to ask, please email us through the AEP support inbox.

I’d like to thank the team who presented today, I really appreciate that, and I’d like to thank everyone who joined in the last session. Thanks very much.

Goodbye for now.

Thank you.

[Webinar ends]