

Submission - anonymous

Dear PRA Team

Congratulations on this extensive document which has come out nicely. I understand the painstaking efforts involved in it. I have a few suggestions, which may intrigue you, but I write these comments in confidence, belief and experience. It is requested to consider them in their spirit.

If the intent of measure is not a NTB (may be essential though, at times) and if the import of the product is in importing country's interest, it would be appropriate to have new thinking like identification of new treatments / extrapolating existing treatments. Even measures, if considered in association with relevant NPPO (India?), like PFAs/ALPPs for Khapra beetle are quite possible and feasible and they will indeed be very helpful in streamlining the trade. AFAS-MB is a good co-operating programme in this area.

So, the suggestions:

1. To meet the ALOP for Australia with regards to *T. granarium*, as stated in 1.2.2., measures that are either novel, which can be very simple, or measures that are fairly complex or both are needed.

~since bioclimatic status shown in Map 2; where only areas from Brisbane and southwards to Hobart and some south-west area of Australia have less potential for establishment of the pest while all other areas are vulnerable.

for which the provision mentioned in Summary, 'Offshore treatment providers will be AusTreat' will come in handy *simple novel measures like (1) refuge traps (2) phosphine treatment consideration for satisfactory duration and in lines of AFAS –MB or for that matter any other treatment

- Relevant traps need to be designed and be used as per developer's protocol. This is cost effective, efficient and will address Australian concern mentioned in 3.1.1.1 bullet 6 on failure to detection

- Phosphine is an effective treatment for khapra beetle as long as fumigation is strictly as per protocol and the target species is not in diapause, which is not so often against popular belief, if any. At present only practical treatment appears to be methyl bromide fumigation and other treatment options appear to be cumbersome and commercially or even practically non-viable/feasible/economical given the durations like 28 or 22 or even 12 days or requirement like high atmosphere pressure..... especially for grain and such edible products. {1.5 : approved pre-export treatments}. This is also mentioned in the current draft under 'approved treatments']

entirely new framework needs to be considered by appropriate teams, which can be achieved by doing some reality check, using first-hand information in target countries, some

tweaks in ISPM-14 and preparing a management document on System's Approach which may have a few independent and several dependent measures; some of which can be quite simple and inexpensive and can be applied and/or monitored with ease.

- To name a few measures – Independent: based on life cycle, packaging, storage houses, movement & transport, treatments, processing houses etc. with a slew of dependent and sub-dependent measures under each independent one, for example; under life cycle – various stages – for egg stage dependent measure would be farm harvest & storage (sampling & inspections), mills (vacuum cleaning, refuge traps, mechanical disturbance/entomology, treatments, capacity building), warehouses (sanitation, vacuum cleaning), pack-houses (new bags, sieving, treatments – MBr/phosphine, capacity development) and containers (trace back/forward, usage logs, refuge traps, vacuum cleaning, air tightness, treatments, automated records)
- Similar measures exist or can be thought of for each entity, stage, and infrastructure involved and assimilated in a programme.

In above case, it may be convenient if part 1 and part 2 of proposed Australian PRA are merged into a single document. Simple cost-effective measures can be imposed on all containers irrespective of country, route, method, product etc.; if system's approach to be considered and applied

2. The justification for additional declaration for freedom from "(all or a few?) species of *Trogoderma* appears taxing on exporting NPPOs; the draft itself says that's there is a high risk of misidentification. There could be risk of misidentification with other dermestids too and going by that logic freedom from all dermestids to be demanded. The point of attention of this para is just to not to allow dilution of focus on *Khapra* beetle. Broad declarations may tend to remain only on paper especially if the country lacks the relevant expertise and resources

3. Inclusion of literature like one on *T. halsteadii* is probably best omitted. Isolated literature like on retrogressive moulting may need more corroboration.