

6 March 2026

Department of Agriculture, Fisheries and Forestry
Plant Systems and Strategies Stakeholder Engagement team
GPO Box 858
Canberra ACT 2601, Australia



Sent via: plantstakeholders@aff.gov.au

Dear Plant Systems and Strategies Stakeholder Engagement team,

Re: Draft Pest Risk Analysis for khapra beetle (*Trogoderma granarium*)

The Australian Seed Federation (ASF) welcomes the opportunity to comment on the Draft Pest Risk Analysis for khapra beetle (*Trogoderma granarium*) – Part 1.

ASF supports the Department's objective of maintaining Australia's appropriate level of protection (ALOP) and recognises the serious biosecurity risk posed by khapra beetle. The Australian seed industry strongly values robust, science-based biosecurity arrangements and works closely with government to support effective risk management.

ASF notes that the draft report largely maintains the existing emergency measures currently applied to plant products. However, the proposed **treatment of plant products imported for research purposes, including seed for planting, is not entirely clear**. The draft report proposes that research imports be subject to specific risk management measures, such as biosecurity containment, pre-export inspection and phytosanitary certification with an additional declaration, or the application of an import permit with conditions determined by the Department. While these options provide flexibility, **it would be helpful to clarify how the Department intends this pathway to operate in practice**.

The draft report also recognises that **seed for planting generally presents a lower biosecurity risk** pathway for khapra beetle compared with other plant products, due to the higher value of seed and the quality control, processing and storage practices applied. The global seed industry has consistently emphasised this risk profile, noting that **seed processing, cleaning and treatment steps significantly reduce the likelihood of storage pest contamination**. ASF therefore encourages the Department to ensure that any final measures applied to seed remain proportionate to the demonstrated risk.

ASF suggests that research imports of seed could continue to be managed effectively through a clearly defined, risk-managed pathway rather than through broad restrictions. Research seed imports are typically small in volume, subject to strong institutional oversight, and handled within controlled environments. Where appropriate, import permits, approved facilities, traceability requirements and disposal protocols can provide enforceable controls that manage biosecurity risk while allowing legitimate research activity to continue.

Such an approach would be consistent with the principles underpinning the IPPC framework, including managed risk, minimal impact and technical justification, as well as with international standards such as ISPM 38 relating to the international movement of seed. Global seed industry bodies have also emphasised the importance of maintaining workable pathways for the movement of small research seed lots under appropriate biosecurity controls.



ASF would welcome further engagement with the Department on this issue. In particular, we would support a discussion involving the Department and relevant seed companies to clarify how research seed pathways can be managed in a way that both meets Australia's ALOP and ensures that plant breeding, diagnostics and pre-competitive research activities can continue efficiently.

Thank you for the opportunity to comment on this draft analysis.

Yours sincerely,

Katherine Delbridge
Chief Executive Officer
Australian Seed Federation