



CBC activity 21-22/01:
Integration of Khapra beetle urgent actions into the class 19.1 NCCC approved arrangement –
10th July 2021.
Q&A

	Question	Answer
1	Are the Khapra beetle measures a seasonal or permanent measure?	These are permanent measures due to the increased interceptions and biosecurity risk.
2	Apart from those countries currently on the Khapra beetle list, are there any countries currently under review could be added as risk countries in the foreseeable future?	Khapra beetle target risk countries is subject to change. Global detections or reports of Khapra beetle are actively monitored and reviewed by the department. The department will liaise with affected trading partners and advise stakeholders on updates to this country list through industry advice notices and BICON alerts.
3	How do you determine target risk goods countries?	The department has identified target risk countries as those where Khapra beetle is present. Khapra beetle is found throughout Asia, Africa, the Middle East, and Europe.
4	Are all Khapra beetle destination postcodes currently included in the rural postcode list?	Yes. Rural/grain growing postcodes, which are subject to the 6A sea container measures, are now available on the Regional postcode delivery classifications search tool. There is also a list available on the Sea containers page. https://www.agriculture.gov.au/sites/default/files/documents/khapra-postcodes.pdf
5	Do you have a graphic showing what these grain growing areas are?	No graphic is currently available, but the Khapra beetle delivery postcodes will return in the Regional postcode delivery classifications search . If a grain growing area the search results will return with “postcode XXXX is rural/graining growing”.
6	Is there a list of postcodes and suburbs that are considered rural/grain growing?	Yes – a list available on the Sea containers webpage. https://www.agriculture.gov.au/sites/default/files/documents/khapra-postcodes.pdf The Khapra delivery postcodes will also appear in the Regional postcode delivery classifications search .



7	If a consignment is destined for a split postcode, but not a rural suburb (for example Derrimut), does the container need to be treated for Khapra beetle concerns?	Within split postcodes, mandatory offshore treatment requirements will only apply to containers being unpacked in the areas classified as rural. Postcode classifications can be found using the department's postcode classification search tool: Regional postcode delivery classifications search
8	Why are empty and flat racks not of concern?	General purpose sea containers (particularly with wooden floors) provide the appropriate environment for Khapra beetle to survive, such as cracks and crevices to hide in. Further, the presence of any grain remnants and other residues under floors can provide a food source for Khapra beetle in these types of containers. Flat rack containers pose a lower risk as they do not provide the same environment. In relation to the empty containers, the level of risk is dependent upon the nature and origin of the goods held previously. The department is currently working on enhancing its electronic system capabilities to support the implementation of these measures for high-risk empty containers.
9	Why do these measures not apply to LCL containers?	LCL consignments are deconsolidated in a metropolitan location. Currently, containers that are packed with any goods, excluding high-risk plant products, and will be unpacked in a metropolitan area of Australia are excluded from the Khapra beetle measures. The Khapra beetle measures are being implemented in a phased approach. The first phase of the Khapra beetle sea container measures target the sea containers that pose the greatest risk of introducing Khapra beetle into Australia. However, later this year, we will be introducing further requirements aimed at addressing a broader range of sea containers. Further information about these measures, including details on consultation, will be made available on our website.



Australian Government

**Department of Agriculture,
Water and the Environment**

10	If FCL goods are unpacked in a metropolitan postcode for inspection, then repacked into the same containers for transport to a grain growing rural area, how does the broker treat this?	Only containers being unpacked in a rural grain growing area of Australia are subject to the sea container measures. Containers being unpacked in a metropolitan area are not subject to the measures at this stage. However, in instances where the delivery address indicates a rural grain growing area, but nil rural concern type is declared by the broker, the department may seek documentary evidence to verify metro unpack location.
11	Are containers coming from a concern country with a metropolitan location unpack and moved after unpacking to a rural grain growing area for packing for export or other movement subject to Khapra beetle measures?	No. Currently, containers that are packed with goods, excluding high-risk plant products, and are unpacked in a metropolitan area of Australia are excluded from the Khapra beetle measures. The Khapra beetle measures are being implemented in a phased approach. The first phase of the Khapra beetle sea container measures target the sea containers that pose the greatest risk of introducing Khapra beetle into Australia. However, later this year, we will be introducing further requirements aimed at addressing a broader range of sea containers.
12	If the intended unpack location is changed to a non-grain growing rural area, will re-export be avoided?	Yes. The container, if it is packed with goods, excluding high-risk plant products, and is unpacked in a metropolitan area of Australia is excluded from the Khapra beetle measures, including export.
13	If a sea container from a Khapra beetle country is not treated offshore, can you request a metro unpack?	Yes. Khapra beetle measures are not required for other goods packed into the sea container in a Khapra beetle target risk country and unpacked in a metropolitan location. If high-risk plant products are packed into the sea container in a Khapra beetle target risk country offshore treatment is required.
14	If the container arrives in Melbourne (metro) and the unpack destination is Sydney (metro), would this be considered as being unpacked in a metro area if the container is transported via a rural/grain growing area?	Yes, this would be considered as being unpacked in a metropolitan destination. Only containers being unpacked in a rural grain growing area of Australia are subject to the Khapra beetle sea container measures.



15	If the sea container requires treatment before loading to manage the risk of Khapra beetle, why is the commodity important?	The commodity is of concern if it is high risk plant products packed into the sea container in a Khapra beetle target risk country. For all other goods it is of concern if they are packed into the sea container in a Khapra beetle target risk country and will be unpacked in rural grain growing area of Australia. A target risk container is defined as a Full Container Load/Full Container Consolidated (FCL/FCX) where: <ul style="list-style-type: none">•high-risk plant products are packed into the sea container in a Khapra beetle target risk country•other goods are packed into the sea container in a Khapra beetle target risk country and will be unpacked in rural grain growing area of Australia.
16	Is the container allowed to be treated onshore if it has not been treated offshore?	No. Phase 6A will introduce mandatory offshore treatment requirements for target risk sea containers. The target of these treatments is the container and not the goods/commodity being shipped within the container. This means that the container must be treated prior to packing, except if using methyl bromide fumigation. There is no onshore treatment available and failure to comply with these requirements will result in export of the container upon arrival in Australia.
17	Why can't containers that are treated with methyl bromide be treated upon arrival in Australia?	Onshore treatment will not be offered as a standard practice as movement of untreated containers poses an unacceptable risk. This is because Khapra beetle could be dislodged from the container into the environment when moving the container from the port to a treatment facility.
18	If the fumigation only indicates the Final TLV reading (ppm) 01 ppm but without indicate end point reading 20g/ m3 or above, is that acceptable?	The treatment certificate requires the TLV reading to be listed but not the end point reading. The TLV must be 5ppm or below. An end point concentration reading above 20g/m3 is required to be achieved and recorded on the Record of Fumigation, but not on the Treatment Certificate. The Treatment Certificate is required for assessment during import.



19	<p>There are going be times when both Khapra beetle and brown marmorated stink bug (BMSB) measures will apply to a container as the country of loading has both risks. Which treatment method is to be used as the primary one to manage both risks?</p>	<p>Under Phase 6A of the Khapra Beetle measures, mandatory offshore treatment applies to full container load/ full container consolidated (FCL/FCX) containers. The target of the Khapra beetle treatment under phase 6A is the container itself and not the goods/commodity or the packing. For brown marmorated stink bug (BMSB) measures, the target of the treatment is the goods. Where a consignment is subject to both sets of measures, both risks must be managed. These risks can be managed separately, where separate treatments are conducted for the goods and the container, or they can be managed at the same time. Methyl bromide fumigation is the only treatment option suitable of managing both risks at the same time. In these instances, the goods must be suitable for treatment at the time of treatment (including packaging and free airspace requirements) and the highest treatment parameter of each treatment must be used. This includes the:</p> <ul style="list-style-type: none">• dose• start point concentration• temperature• exposure period• end point concentration reading. <p>An example is provided on our website here.</p>
20	<p>For Insecticide, when you say container size, is the table just for general purpose containers as high cube containers are commonly used? Do we have to go to the website for validation or submit documents via COLS each time?</p>	<p>Yes – high cube containers are included in the Full Container Load/Full Container Consolidated (FCL/FCX) description. As an accredited person under the NCCC you assess non-commodity documentation for biosecurity concerns. When Khapra beetle target risk sea containers are identified you will be required to assess documentation as per the import conditions stated in the non-commodity BICON case You need to confirm the treatment details that are entered on the certificate via the Insecticide application calculator on our website. Documents are only required to be submitted if the certificate did not meet requirements and a Khapra beetle (KPRA) concern has been identified.</p>



21	Does the standard 20' and 40' containers in the calculator include high cube containers?	Yes – high cube containers are included in the Full Container Load/Full Container Consolidated (FCL/FCX) description
22	There is more than 20m ³ in a 20' FCL. Is the insecticide application calculator correct?	<p>The 'total area' is the total surface area of the target surface of treatment (m²). Multiple containers can be captured on one treatment certificate, in which case the area of all treatment surfaces must be added together. The department has determined the following treatment surface areas apply:</p> <ul style="list-style-type: none">• Each 20ft container must be at least 80m²• Each 40ft container must be at least 140m² <p>The 20m² refers to the specified treatment rate. For Khapra beetle treatments, the rate must be exactly 1 litre of spray solution per 20m² as per BICON requirements. The online version of the Insecticide application calculator is available to assist with these calculations.</p>
23	Is phosphine acceptable as an insecticide treatment?	<p>No. The approved treatment options for target risk containers under Phase 6A are</p> <ul style="list-style-type: none">• Methyl bromide fumigation• Heat treatment• Insecticide treatment. <p>The use of phosphine as a fumigant is limited by the long exposure time necessary to kill all stages of insects, the resistance of certain insect pests, and poor efficacy at temperatures below 15°C. At this stage phosphine fumigation is not an acceptable treatment for Khapra beetle.</p>
24	Can you please advise the treatment method for open top containers?	<p>As per the approved treatment options for target risk containers under Phase 6A.</p> <ul style="list-style-type: none">• Methyl bromide fumigation• Heat treatment• Insecticide treatment. <p>And in accordance with all other requirements in the appropriate treatment methodology.</p>
25	Where do we find the treatment pamphlet/infographics?	<p>Treatment infographics</p> <p>Located on the Sea container measures to protect against Khapra beetle (<i>Trogoderma granarium</i>) page on our website.</p>



26	Does the treatment within 21 days requirement refer to export date (shipped on board date) or sealing date? If the container has been sealed within 21 days but the container is exported after 21 days, is this acceptable?	<p>Yes. This would be when a sealing declaration could be provided to demonstrate that a container has been treated within 21 days prior to export.</p> <p>The date of export is defined in the Minimum documentary and import declaration requirements policy. Under this definition, a consignment is considered to be exported either:</p> <ul style="list-style-type: none">• when it is lodged with the freight forwarder, shipping company/airline, charter operator or an appointed agent in the country of origin, for ultimate destination in Australia• when it is shipped on board the vessel• when it is packed in a container and sealed in preparation for export. <p>As an example, if the container is packed and sealed within 21 days of treatment, the container meets the treatment within 21 days of export requirement. To demonstrate that this requirement has been met a sealing declaration is required.</p>
27	Fumigators generally seal containers and place this number on the certificate, will this be considered a sealing declaration rather than a sperate document?	Section 9.1 of the Minimum documentary and import declaration requirements policy provides further detail on acceptable documentation for evidence of date of sealing and date of export.
28	Shipping lines supply the containers at origin, know the historical use of that container and where it has been. Have shipping lines been approached to play a role in these measures?	We are working with shipping lines along with supply chain members both overseas and in Australia. We have found the shipping lines do collect some but not all the information we may need. Data collection differs depending on the source and is not readily available. However, we are continuing to work with them to implement the measures.
29	Is the gate in/gate out certificate equivalent to the regular tracking data from a shipping line website tracking an option?	Regular tracking data from a shipping line website will not be considered for this purpose This is a certificate issued by a shipping line or freight forwarder or stevedore for goods/container to confirm the date and location it was exported following treatment.



30	<p>Is the Khapra beetle risk for FCL containers based on the country that the goods are packed and shipped from, not that the goods are made in a risk country? For example, if goods are made in India but packed and shipped from the UK and destined for a rural grain growing area, would this consignment not be subject to the measures as the container is exported from a non-risk country?</p>	<p>The non-commodity BICON case will have additional import questions to determine the origin and unpack destination postcode of the consignment.</p> <p>In this scenario You will be asked;</p> <ul style="list-style-type: none">• the port of loading and• country of supplier/exporter/shipper. <p>You answer United Kingdom for the port of loading and India for the country of supplier/exporter/shipper.</p> <p>You are then asked, “Do you have a sealing declaration from the freight forwarder to verify the sea container was not packed in a Khapra beetle target risk country?”</p> <p>Mandatory offshore treatment of the sea container will be required if a sealing declaration is not provided to confirm the goods were not packed in a Khapra beetle target risk country.</p>
31	<p>Can you confirm that 19.1 and 19.2 revised documents need to be signed and returned to Broker Administration as part of the variation?</p>	<p>Yes, the 19.1 and 19.2 documents will need to be returned after implementation.</p> <p>Broker Administration have included a request for the signed declarations in the Notice of Decision (NOD). Brokers need to ensure they are completing the updated versions Requirements and conditions for approved arrangement class 19.1 non-commodity for containerised cargo clearance (version 5.0) and Requirements and conditions class 19.2 automatic entry processing for commodities (version 9.1).</p>
32	<p>Why can't the class 19.1 approved arrangement use AEP for fumigation on arrival for BMSB measures?</p>	<p>The Class 19.1 NCCC approved arrangement allows accredited persons to assess non-commodity documentation and manage any non-commodity related concern via AEP. The BMSB measures relate to certain goods manufactured in or shipped from target risk countries.</p> <p>Target high risk goods and target risk goods are defined by tariff classifications. Therefore, using AEP to direct for onshore treatment is only possible under the class 19.2 AEPCOMM approved arrangement which is focussed on managing commodity related biosecurity concerns.</p>