SUBMISSION

Draft pest risk analysis for khapra beetle – Part 1 (link HERE)

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Submission Terms of Reference

Provide your feedback on the Draft pest risk analysis for khapra beetle (Trogoderma granarium) – Part 1.

Khapra beetle (Trogoderma granarium) is a small but serious hitchhiker pest that poses serious threats to Australia's biosecurity, particularly to grain and other stored plant products.

We want to keep it out of Australia and have implemented emergency measures (also known as urgent actions) that affect the importation of plant products and sea containers.

As part of this work, we are conducting a pest risk analysis (PRA) to:

- *assess the biosecurity risks posed by khapra beetle*
- *evaluate whether the current emergency measures effectively manage these risks*
- *recommend appropriate ongoing risk management measures.*

The PRA is being delivered in two parts:

- *Part 1 on Australia's plant product import pathway*
- *Part 2 on Australia's sea container pathway (to be released separately)*

We are seeking your feedback on the draft report for part 1 of the PRA for khapra beetle. The draft report includes:

- *the PRA for khapra beetle associated with imported plant products*
- *an evaluation of the current emergency measures*
- *proposed ongoing risk management measures*
- *other technical considerations of the report.*

Your input will help inform part 1 of our final PRA for khapra beetle which we plan to publish in late 2026.

Please note: the current emergency measures for plant products will remain in place until part 1 of the PRA is finalised.

Introduction

Grain Producers Australia (GPA) represents the interests of direct grower members, state farming members and an estimated 24,500 levy-paying grain producers who grow broadacre, grain, pulse and oilseed crops throughout Australia. GPA develops national policy to support outcomes and advocacy for Australian grain producers which helps deliver a more profitable, sustainable and globally competitive grains industry.

GPA's roles are legitimised under federal legislation, with responsibilities representing all levy-paying growers on vital industry matters, to support delivery of shared economic, environmental and community benefits. Grain producers contribute 1.02 per cent of their net crop sales toward compulsory levies to fund the Grains Research and Development Corporation (GRDC) for research, development and extension, Plant Health Australia (PHA) membership to provide biosecurity prevention and eradication management, and the National Residue Survey (NRS) testing for grain quality and market access. Of that 1.02pc, the vast majority is allocated to the GRDC (0.99pc), followed by PHA (0.01pc), NRS (0.015pc) and the emergency plant protection response (0.005pc). GPA provides unified representation for the 25 leviable crops that underscore these comprehensive legislated responsibilities for all levy paying grain producers.

Industry context
Australian grain producers contribute to the economic strength of their industry, rural communities and the national economy, with an industry valued at more than $31 billion in 2022–23.
The table below, from GPA's 2025 Federal Election Priorities document HERE, shows the Australian grains industry has also grown significantly, contributing $81.15 billion in total gross value over recent years (2022–24), at an annual average of about $27 billion. This represents almost double industry's contribution to the national economy prior to the last federal election in 2022 ($13.8 billion in 2020–21).
In March 2025, ABARES released its 2024–25 winter crop forecasts, estimating total production at 59.8 million tonnes, the third largest on record. Overall, this crop represented a 26pc year-on-year increase and sat 27pc above the 10-year average.

Grain Producers Australia 2025 Federal Election Priorities 4

National Grains Production/Output	TOTALS (2022-24)	2023-24	2022-23	2021-22	2020-21
Gross Value of Grain Production	$81.15b	$21.67b	$31.1b	$28.38b	$13.8b
Total Grain Production (million tonne)	188.3m/t (ave 62m/t)	51 m/t	70.8 m/t	66.5m/t	55.8 m/t
Total Area Crops Sewn (hectares)	-	24.3 m/ha	25.6 m/ha	25.4 m/ha	22.7 m/ha
Total Value Grain Exported	$75b	$21.8b	$29.7b	$23.5b	$12.4b
Total Volume Grain Exported (million tonne)	140.1 m/t (46m/t ave.)	43.7 m/t	51.7 m/t	44.7 m/t	36.5 m/t
Total Value of Farm Production (TVFP)	$261.2b	$81.8b	$91.5b	$87.9b	$68.3b
Grains Industry's Share of TVFP	31pc	26.5pc	34pc	32pc	20pc
Number of grains levy-payers (grains farms) * ABARES definition Estimated Value of Ag. Operations plus $40,000	-	24,331	22,491	21,720	22,500

Figures from GRDC Annual Reports/ABARES (as per page (10-11)

** Further details on GPA available at the foot of this submission and excerpt from GRDC 2022-23 Annual Report.*

Thank you for providing GPA the opportunity to submit our members' views in relation to the Draft pest risk analysis for khapra beetle (Trogoderma granarium), Part 1.

GPA provides this submission in its role as the national representative body for levy-paying grain producers, reflecting grower perspectives on the biosecurity importance of khapra beetle and the practical implications of the draft PRA for the Australian grains industry.
As a signatory to the Emergency Plant Pest Response Deed and a member of Plant Health Australia, GPA's focus is on ensuring that biosecurity settings remain robust, practical and informed by industry experience. This submission therefore provides an industry perspective on the draft PRA and its implications for growers, rather than a scientific critique of the analysis.

Biosecurity importance to the grains industry
Australian agriculture, including grain production, is a fundamental contributor to Australia's food security and national economy. Without viable agricultural production, many farmers and rural communities would face significant economic and social impacts. The significant economic contribution by the grains sector is highlighted in the introduction section above.

Biosecurity prevention is front and centre for Australian agriculture and grain producers and the Federal Government must continue to prioritise biosecurity to protect the agricultural industry.
While GPA does not seek to comment on the technical elements of the draft PRA, it is important that the final analysis continues to reflect practical industry realities.

From a grains industry perspective, clarity and confidence in biosecurity settings are critical. Transparent communication of risk conclusions and ongoing engagement with representative bodies will be important as the PRA is finalised and any future measures are considered.

Maintaining strong alignment between government risk settings and industry preparedness will support confidence across the supply chain and help ensure continued industry support for Australia's precautionary biosecurity approach.

Khapra beetle risk and industry preparedness

The Australian grains industry has experienced a number of near misses from khapra beetle, which is estimated to inflict a $15.5 billion hit to the economy if the hitchhiker pest became established in Australia. This high priority pest would have devastating impacts on both grain market access and industry capability.

The Inspector-General of Biosecurity's report, *Robustness of biosecurity measures to prevent entry of khapra beetle into Australia (2021)*, identified weaknesses in Australia's biosecurity preparedness for khapra beetle, which is the nation's number two priority plant pest.

Informed by an analysis of gaps in the national grains biosecurity system, which also reflects critical findings in the Inspector-General's report, PHA has developed a proposal to fund priorities in the National Grain Biosecurity Surveillance Strategy. This proposal, the Australian Grains Biosecurity Plan, has been developed with input from key industry stakeholders including GPA, GrainGrowers Ltd. and GRDC.

The Federal Government's focus in this area to update the PRA for biosecurity risks, current emergency measures and make recommendations for the future is to be commended.

Both the Inspector-General's khapra beetle review and the national grains biosecurity surveillance stocktake and gap analysis presented a compelling case for urgent additional investment and activities by industry and government to strengthen grains industry biosecurity preparedness through enhanced understanding of incursion pathways and enhanced industry surveillance capacity and coordination.

With the addition of a further eight countries to the target-risk list in Table 4.1, GPA believes it is important to reconsider the overall risk profile for khapra beetle to Australia. Additionally, it is important that Australia retains the ability to maintain research and development relationships with affected countries where appropriate.

Emerging risk pathways

Finally, GPA notes the potential for khapra beetle risk pathways to evolve over time, including through non-traditional or emerging pathways. The increasing use of plant-based and fibre-based packaging materials in global supply chains may inadvertently create favourable environments for hitchhiker pests, including by providing harbourage or food sources during transit. Recognising and monitoring these evolving pathways will be important to ensure Australia's biosecurity settings remain forward-looking and precautionary.

Conclusion

In finalising Part 1 of the PRA, GPA encourages continued recognition of the following industry considerations:

- Maintaining strong precautionary settings for high-impact hitchhiker pests
- Ensuring that risk management measures remain practical and workable across grain supply chains
- Retaining appropriate flexibility to support research and collaboration that strengthens preparedness and response capability
- Continuing consultation with industry as the PRA process progresses

Australia's grains industry has a strong track record of working in partnership with government to support a robust national biosecurity system. GPA remains committed to constructive engagement as the PRA process continues and welcomes ongoing consultation as further analysis, including Part 2, is developed.

GPA's Representative Roles and Responsibilities

Grain Producers Australia represents the interests of an estimated 24,500 grain producers who grow broadacre, grain, pulse and oilseed crops throughout Australia, contributing to the economic strength of their communities. GPA advocates national policy and outcomes to benefit grain producers and help deliver a more profitable, sustainable and globally competitive Australian grains industry.

GPA's objectives are to:

- *Provide a strong, independent, national advocate for grain producers based on a rigorous and transparent policy development process.*
- *Engage all sectors of the Australian grains industry to ensure operation of the most efficient and profitable grain supply chain.*
- *Facilitate a strategic approach to research, development and extension intended to deliver sound commercial outcomes from industry research.*

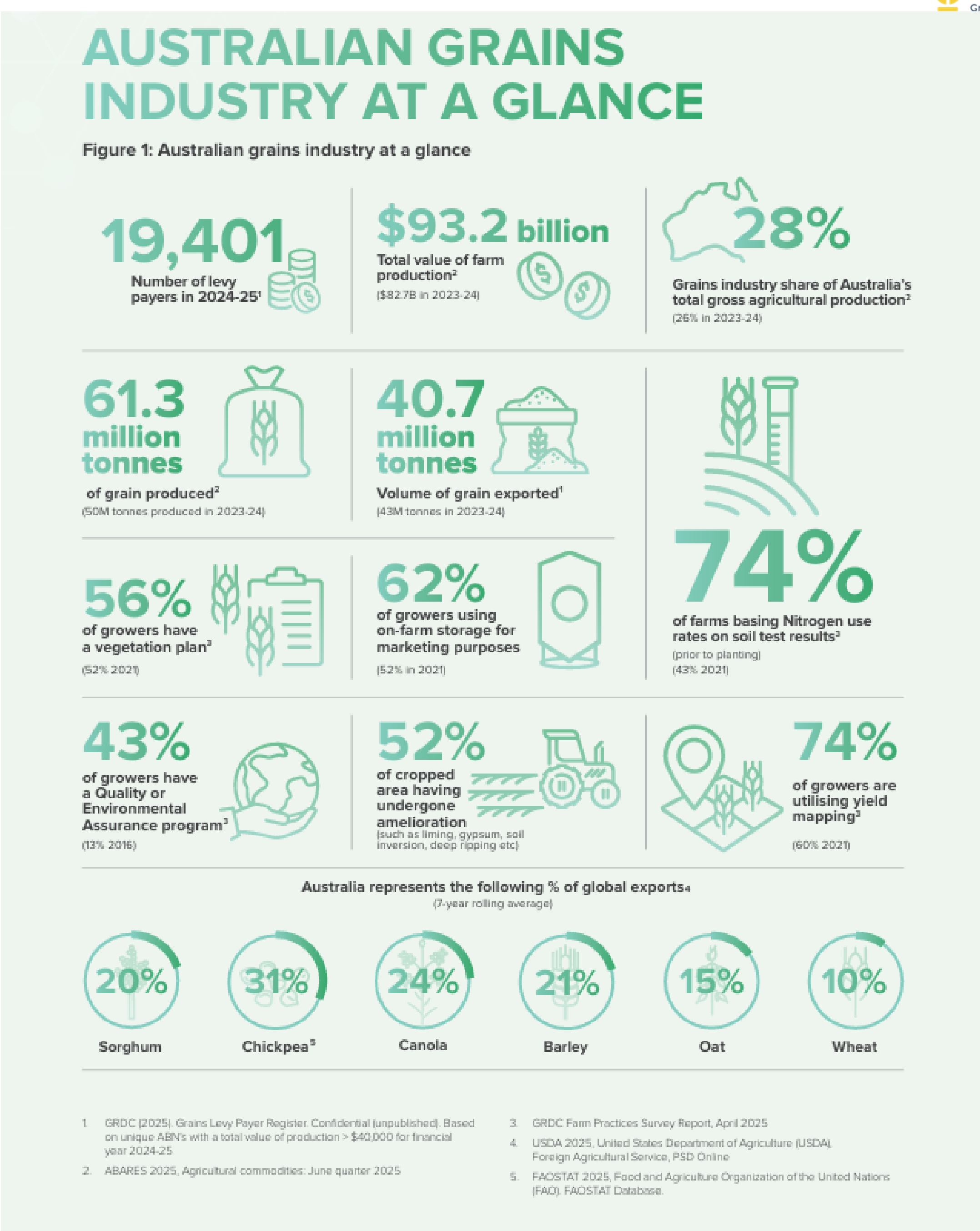
As a not-for-profit company limited by guarantee, GPA is governed by a board that's elected by producer members, representing the major grain producing regions. GPA's membership comprises direct producer members and the producer members of the Grains Councils of State Farming Organisations. Elected leaders of these groups – backed by professional staff – represent the interests of their grain producer members, to the GPA Policy Council.

GPA's State Members include:

- AgForce Grains
- Grain Producers SA
- NSW Farmers Association
- Victorian Farmers' Federation Grains Group
- Tasmanian Farmers and Graziers Association
- WAFarmers Grains Council
- WA Grains Group

These legitimate representative processes also engages grain producers to advocate their views on policy Sub-Committees, such as GPA Biosecurity Committee and GPA Pesticides and Technology Sub-Committee.

GPA's responsibilities representing the interests of Australia's levy-paying grain producers are legitimised under federal legislation. This includes; Plant Health Australia as a signatory to the Emergency Pest Plant Response Deed (EPPRD); as a joint Representative Organisation responsible for overseeing the Grains Research and Development Corporation's performance and strategic investment, with matching Federal Government funding, in RD&E activities, under the PIRD Act; and managing the risk of chemical residues and environmental contaminants in grain products, to help facilitate access to domestic and export markets and protect product integrity and export reputation, via the National Residue Survey.



Further information: https://www.grainproducers.com.au/