

26 February 2026

Plant Systems and Strategies Stakeholder Engagement team
plantstakeholders@aff.gov.au

Re: Draft pest risk analysis for khapra beetle (*Trogoderma granarium*) — Part 1

Khapra beetle is Australia's number two National Priority Plant Pest and the number one priority plant pest for grains. The introduction of a pest like khapra beetle would cost Australian growers valuable markets, with a widespread incursion costing Australia an estimated \$15.5 billion over 20 years.

Whilst khapra beetle is often discussed in the context of being a hitchhiker pest and the risks associated with container movements, it can enter Australia via a variety of pathways which emphasises the value of undertaking the current analysis. The detection of a live khapra beetle larva in cardamom pods brought into Sydney airport from India in 2022¹, and the range of interceptions listed in the Pest Risk Analysis (PRA), are reminders that constant vigilance and appropriate risk management measures in place across a range of import pathways is critical.

GrainGrowers recognises the importance of biosecurity for the grains industry, and the concerns of industry members regarding pests and diseases. Maintaining Australia's pest and disease status is consistently identified by growers as highly important in GrainGrowers Annual Policy Survey. GrainGrowers does not have technical comment to provide on the Draft PRA for khapra beetle (Part 1) but acknowledges the importance of these ongoing activities and the need for continued transparent engagement with industries through this process.

GrainGrowers notes that Part 1 of the PRA considers biosecurity risks of khapra beetle associated with plant product pathways, and that the biosecurity risks of khapra beetle associated with sea container pathways will be considered in Part 2 with consultation expected later in 2026.

It is noted that Part 1 of the PRA recognises the validity of the urgent actions that had been implemented in response to khapra beetle incursions, and GrainGrowers supports the continuation of these measures. It is also noted that the list of 'target-risk khapra beetle countries' has been expanded to include 8 additional countries: Angola, Chad, Guinea, Jordan, Kazakhstan, Tajikistan, Tanzania and Turkmenistan.

¹ ["Khapra larva threat thwarted at Sydney airport" 23 August 2022, Minister for Agriculture, Fisheries and Forestry](#)

It is important that the Department continues to proactively respond to new information and changes to risks levels and takes action as appropriate. The implementation of the urgent actions by the Department, and the subsequent PRA for khapra beetle, to date has been appropriate. The risk associated with pathways and risk countries for khapra beetle along with risk management options will change over time, and it is important that Australia's biosecurity system is responsive to these changes and resources the work appropriately.

GrainGrowers would welcome updates on the process and looks forward to engaging further with the Department in this process. If you would like to arrange a discussion on this issue, please contact GrainGrowers Policy Manager Technical and Innovation, Sam Nelson (sam.nelson@graingrowers.com.au).

Yours sincerely,



Zachary Whale
General Manager, Policy and Advocacy
GrainGrowers Limited