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25 FEB 2026

Dr Peter Finnin
First Assistant Secretary
Biosecurity Plant and Science Services Division
Department of Agriculture, Fisheries and Forestry
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Dear Dr Finnin

Thank you for your correspondence of 27 November 2025 (Biosecurity Advice 2025-P11) regarding the Department of Agriculture, Fisheries and Forestry (DAFF) request for submissions on the 'Draft report for the pest risk analysis for khapra beetle (*Trogoderma granarium*) – Part 1' (the draft report).

The Queensland Department of Primary Industries (DPI) has reviewed the draft report and supports the DAFF pest risk assessment finding that khapra beetle is a quarantine pest for Australia. Accordingly, DPI endorses the need for risk management measures for imported plant products to reduce biosecurity risks and to achieve Australia's appropriate level of protection.

DPI also supports the DAFF evaluation of the current emergency measures for plant products, as well as the proposed ongoing risk management strategies. These strategies generally align with existing emergency measures, but the draft report suggests some changes to the current conditions.

In addition to the changes suggested by DAFF, DPI provides the following comments on Section 4.4 of the draft report and would appreciate these points be considered in the final report:

- *Trogoderma inclusum* to remain on the proposed updated list of species of concern (Table 4.3). This is supported, noting that DPI Plant Biosecurity Laboratory recommended that this species continue to be considered as not established in Australia.
- The draft report refers to the specialist expertise required to confidently identify *T. granarium* based on morphological characters. However, no reference is made to molecular diagnostic approaches and their efficacy in confidently identifying khapra beetle at any life stage, including high-throughput qPCR. DPI recommends that the

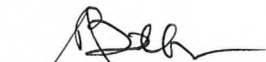
final report include a reference to molecular diagnostic methods and their capacity for identifying *T. granarium*, citing the relevant National Diagnostic Protocols .

- During the stakeholders' consultation session on 3 February 2026, the DPI representative recommended adding “**(Plant pathway)**” after *Part 1* in the draft report title to remove any ambiguity and clearly indicate that the report exclusively addresses importation via the plant pathway.

Thank you for the opportunity to contribute to this important national review and for considering Queensland's comments in finalising the report. DPI would welcome involvement in any subsequent review processes leading to the finalisation of the report and would appreciate being kept informed of any biosecurity risks identified following policy implementation.

If you require further information, please contact Dr Abu-Baker Siddique, Plant Biosecurity and Product Integrity, on 0422 348 033 or by email at Abu-Baker.Siddique@dpi.qld.gov.au

Yours sincerely



Graeme Bolton
Director-General
Department of Primary Industries