

ATT1 – DPIRD (WA) Submission: Pest risk analysis for khapra beetle (*Trogoderma granarium*) — Part 1: Draft Report

Western Australia is free of many pests, diseases and weeds that are present in other parts of Australia and the world. Our geographical isolation and a robust biosecurity system, including border quarantine checkpoints, domestic and intrastate regulatory controls, industry and public awareness campaigns, and specific and general surveillance programs, all help maintain this freedom.

The primary legislation that underpins biosecurity in WA is the *Biosecurity and Agricultural Management Act 2007* (BAM Act) and its associated regulations. The Act provides the means to control the entry of prescribed potential carriers of quarantine pests and diseases, such as plant material, machinery and seeds, and to determine import requirements or regulate movement within the state.

Plants and plant products may be imported into the state subject to general import requirements, and specified import requirements for commodities or pests where applied. It is a legislative requirement for all potential carriers to be presented for inspection upon entry into Western Australia. The detection of any quarantine pests during an inspection results in remedial action.

Ongoing surveillance programs are also in operation in Western Australia with targeted surveillance activities operating alongside an effective passive surveillance program. These result in suspect samples submitted for identification to the DPIRD Diagnostic Laboratory Service.

Biosecurity concerns are communicated through a variety of platforms to growers and the wider community ensuring public awareness of current issues. DPIRD also utilises a range of extension opportunities to raise awareness in the Western Australian community to report anything unusual. MyPestGuide® Reporter (online and mobile application) assists industry and the community to identify and report the presence of pests and diseases.

In maintaining Western Australia's freedom from quarantine pests DPIRD continues to take a strong interest in all biosecurity risk analyses and related documents and decisions made by the Australian Department of Agriculture, Fisheries and Forestry.

General Comments

DPIRD agrees with and supports the general procedure, analyses, conclusions, and offers the following recommendations to enhance the clarity and accessibility of the draft report.

Pest Information

Comment 1: The Pest Information section could be strengthened by including additional details on surveillance and diagnostic practices relevant to *Trogoderma granarium*.

Recommendation 1: Consider adding a brief overview of surveillance methods (e.g., trapping approaches, inspection activities) and the diagnostic techniques (morphological and molecular) used for species confirmation to enhance clarity and technical transparency.

Likelihood of Importation

Comment 2: The assessment may benefit from further consideration of documented phosphine and malathion resistance in *T. granarium*, particularly given the reliance on phosphine fumigation treatments internationally.

Recommendation 2: Incorporate available evidence on phosphine and malathion resistance and outline how resistance could influence the pest's likelihood of surviving standard fumigation or pest-management procedures.

Comment 3: The PRA notes the efficacy of heat treatments but does not consider factors that may influence their reliability in practice. It does not address the enhanced stress-tolerance mechanisms observed in diapausing *T. granarium* larvae, nor the possibility of sublethal heat exposure in inadequately heated environments, both of which may increase the likelihood of survival if lethal temperatures are not uniformly achieved.

Recommendation 3: Incorporate evidence on diapause-related stress tolerance in *T. granarium* larvae and the risk of sublethal exposure due to uneven heat penetration into the assessment of heat-treatment efficacy and explain how these factors may influence survival following standard heat-treatment protocols.

Import Pathway Diagram

Comment 4: A infographic of the import pathway would help communicate where key risk-management measures apply.

Recommendation 4: Include a pathway diagram showing pre-border (e.g. accreditation, treatments), border (e.g. inspection), and post-border controls (e.g. state and territory regulations) to illustrate the “secure from source to consumer” systems approach.

Detection of Dead Insects or Exuviae

Comment 5: The actions required of exporting NPPOs when dead insects or exuviae are detected during inspection of untreated consignments could be described more clearly to avoid ambiguity.

Recommendation 5: Provide concise guidance on corrective actions, certification expectations, and any required follow-up steps to ensure consistent implementation of Measures 4–7.

Re-export Provisions

Comment 6: Section 4.7.5 may be strengthened by more directly referencing the ISPM 12 requirement regarding goods not being grown or processed in a way that changes their nature in the country of re-export and referring the reader back to section 4.7.4 Requirements for re-export situations.

Recommendation 6: Confirm alignment with ISPM 12 and clearly describe how re-export procedures ensure the phytosanitary integrity of the goods is maintained.

Effectiveness of Emergency Measures

Comment 7: Providing supporting evidence on the outcomes of emergency measures introduced since 2020 would help demonstrate their effectiveness.

Recommendation 7: Include relevant data such as interception trends, compliance levels, and operational insights, and explain how these findings informed the current pest risk analysis.

Non-Compliance Consequences

Comment 8: The report could more clearly outline how non-compliance may affect AFAS or AusTreat accreditation or registration.

Recommendation 8: Clarify whether repeated or significant detections may lead to changes in AFAS or AusTreat accreditation or registration status and summarise the associated compliance framework.

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