

Questions and answers from the khapra beetle information sessions held on the 23, 25 and 26 February 2021

Scope of the Phase 6A measures

Question: Airfreight containers are treated differently to sea containers; I am curious to find out why Airfreight is not considered high risk for khapra beetle?

- **Answer:** The identified source of contamination is the historical movement of high-risk products. Sea containers provide the appropriate environment for khapra beetle as they are designed differently to air containers, meaning the risk is low for air freight.

A separate ban on high-risk products through non-commercial pathways (including via air passengers) has been implemented under Phase 2 of the urgent actions, which has helped to minimise the risk through airfreight.

Question: Why are empty containers and FAK (Freight All Kinds) containers from khapra countries excluded from mandatory offshore treatment?

- **Answer:** The department's electronic systems need to be enhanced to apply holds on empty and FAK containers and this cannot be implemented before 12 April 2021. This is however being considered for Phase 6B measures.

Question: Will the Phase 6A measures apply only to target risk commodities or to ALL the commodities? For example, if an FCL from India comprising brand new machinery, will they be applicable?

- **Answer:** Phase 6A measures will only apply to **containers** that will be used to carry high-risk plant products from a khapra beetle target risk country and **containers** destined to a rural grain growing area of Australia. In the case of the above example, if the container carrying brand new machinery is destined to a rural area for an unpack then the container will be subject to the 6A measures. The measures for containers that will be used to carry high-risk plant products from a khapra country will come into effect from 12 April 2021. The implementation date for containers from khapra countries destined to a rural grain growing area will be announced shortly. Note: the target of the treatment for Phase 6A is the **container** and **not the goods** within the container.

Question: Will these measures impact AEP COMM (Automatic Entry Processing for Commodities)?

- **Answer:** Yes, rice and some milled products are on AEP and they will be impacted. We are working on articulating what those impacts will be, and we will be providing this information to stakeholders.

Question: Do these requirements apply to wood packing?

- **Answer:** Standard conditions for wood packaging apply (i.e. no changes will result from Phase 6A requirements for wood packaging).

Question: Will there be a safeguarding scheme similar to Brown Marmorated Stink Bug?

- **Answer:** There won't be a safeguarding option for Phase 6A. However, we are looking at this as an option in the longer term. We still need to develop assurance mechanisms as part of any safeguarding scheme before it can be offered.

Question Where a supply chain has control and ownership of the containers, will you consider an exemption from the khapra beetle measures if containers have not held high-risk products?

- **Answer:** This will be considered in the longer term, especially with the safeguarding considerations noted earlier. Please contact imports with more information about your supply chain at imports@agriculture.gov.au to inform our policy on safeguarding.

Question: If a high-risk product is tightly packed/no exposure to oxygen, will it be exempt from the measures?

- **Answer:** Not from a container risk management aspect. The target of the treatments under Phase 6 of the khapra beetle urgent actions is the container and not the goods/commodity being shipped within the container. This scenario is not exempt from these container measures as khapra can break through plastic bags if they sense food.

When further commodity work is done for later phases, we will consider further options like safeguarding. You can contact the imports@agriculture.gov.au inbox with further suggestions/advice/evidence to support potential vacuum sealing in addressing khapra risk.

Question: Are thermally processed products exempt from the Phase 6A measures?

- The containers holding thermally-processed plant products will be exempt from Phase 6A measures (please refer to [high-risk plant product list](#) for information on exemptions).

Question: Where a low risk good originates from non-khapra country, but transits through a khapra beetle country, what does this mean?

- **Answer:** The Phase 6A measures will not apply to containers that are packed in a non-khapra country. For Phase 6B the aim is to apply measures to containers that have held high-risk goods over a five-year period. Under Phase 6B, this may mean that containers that hold lower risk goods may be subject to measures if that same container has held high-risk goods over the previous 5 years. If the container has not held high-risk goods, then the measures will not apply. The Department will continue to work with industry to identify those containers for Phase 6B.

Question: If high-risk goods are shipped from target risk countries, via reefer, chilled or frozen, do they need heat treatment prior to departure?

- **Answer No.** From a khapra point of view, the risks posed by reefers are considered as low and therefore they are not subject to Phase 6A khapra measures, but standard commodity requirements will still remain for the products.

Question: Is the type of container not a parameter in the export inspection?

- **Answer:** If this relates to the types of containers being targeted in the measures, the exclusion of LCLs/FAKs is not due to lower risk, it is due to a lack of electronic capability to manage LCL/FAKs etc at this stage.

Question: Will the actions be eased?

- **Answer:** We will continue to review the risk status and the measures will be adjusted accordingly.

How are the Phase 6A measures addressing the risk of khapra beetle?

Question: With measures on only containers that will be loaded with target-risk goods, how does this address the risk?

- **Answer:** From a risk management point of view, the containers we are targeting under Phase 6A are considered highest risk containers. These are containers packed in khapra beetle target risk countries with high-risk plant products. The reason for this is that khapra is known to enter into diapause and survive for years hidden in/under the floor of containers. Khapra will emerge when exposed to a food source, therefore containers with high-risk plant products (food sources) are being targeted by these measures first.

Also, containers destined for grain growing areas will be targeted (commencement date yet to be announced) as khapra beetle is a storage pest and the establishment risk is greatest where it has access to those storage areas.

We are also looking at longer term measures where we will target containers that have held high-risk plant products over the last five years (this will be addressed in Phase 6B).

Question: Why would containers with non-high-risk goods be excluded given the risk?

- **Answer:** These are not excluded altogether, the Phase 6A measures are initially focusing on highest risk containers (as explained above). We will then expand the measures to include all high-risk containers in Phase 6B.

Question: Would not be prudent just to have all containers arriving in Australia fumigated prior to arrival?

- **Answer:** From a risk management point of view yes, but we need to consider our trade obligations. Our import conditions and requirements need to be justifiable, meet our international obligations, and be proportionate to the risk being managed. In the absence of data to identify all high-risk containers, fumigation of all containers could minimise the risks, but we need to apply a level of protection that is considered as appropriate based on scientific principles to manage the risk, minimising unnecessary trade barriers.

Question: Given that khapra beetle can remain dormant in containers for years, couldn't it arrive undetected and untreated if the container is contaminated in a movement from one country to another and subsequently used for a shipment from a non-target country? In this case, the pest is still undetected/untreated so how do the measures address risk?

- **Answer:** We have done the data analysis of the containers associated with khapra detections in Australia; five of them linked the source of the contamination to previous carriage of high-risk plant products from khapra beetle countries, and one where we can't establish the link. We will continue to review the interception data and the risk status of import pathways and adjust our measures accordingly.

Question: What visibility will industry have on what containers are considered high risk?

- **Answer:** Assuming we will be able to identify all high-risk containers, the intent is to share the details with industry so that appropriate risk mitigation measures can be applied prior to their arrival in Australia. From a stored grain risk management perspective, where possible, industry should secure high quality containers and pest free commodities into the container. There is commercial language used to classify container grades. From a broader hitchhiker perspective, standard risk mitigation practices including sweeping, vacuuming, washing etc will help minimise the risks. The Cargo Transport Unit code also has information on phytosanitary best practices. The department is also developing videos and posters to provide more accessible information.

Question: Not allowing onshore options due to costs delays isn't reasonable

- **Answer:** The reason onshore treatment is currently not available is due to the fact that we cannot manage the risk to an acceptable level onshore. For this to occur we need to be able to hold all containers on wharf before movement to a treatment location. We cannot currently prevent movement to treatment locations. We are working on enhancing our electronic system capability to allow onshore options in the longer term, but this is not an option for 6A measures.

Question: What about other rural areas where affected industries (other than grains) are established. How are these industries being protected?

- **Answer:** All containers destined for rural areas in Australia are currently subject to mandatory inspection (external and doors open). As khapra is more likely to establish in a grain growing area, this is the focus of Phase 6A measures. As part of Phase 6B, the list of targeted postcodes will be reviewed to consider nut growing or other khapra risk areas.

Khapra beetle biology/spread/detections

Question: Can the beetles move from container to container on a ship?

- **Answer:** Theoretically yes, but there is not much evidence to suggest this. The other container would most likely need to have some sort of food source, and the containers would need to be very closely positioned over a long period of time. Containers are more likely becoming contaminated by holding contaminated cargo, rather than cross-contamination on a ship.

Question: With the size of the beetle and larva being so small, how do inspectors find them and what techniques do they use?

- **Answer:** Khapra beetles are hard to detect through visual inspections alone due to their tendency to hide in cracks and crevices. Hence the department is mandating treatment of high-risk containers. Where detected, officers can use microscopes and hand lenses to identify khapra, in conjunction with additional diagnostics to confirm the species. Additionally, adjustments in the commodity pathways have been made, including increased sampling of high-risk products. The department is investigating alternative diagnostic technology to enhance the ability to detect khapra in commodities and looking to enhance inspection and diagnostic measures to ensure detection. In later measures, an inspection verification activity will be introduced. The department is coordinating with industry bodies to develop further detection and diagnostic technologies.

Question: Are you investigating detector dogs or particle tracing for detecting khapra?

- **Answer:** We are looking at new diagnostic technologies in detecting khapra, there is one showing merit, eDNA, which can determine the presence or absence of a pest. There have been discussions around the use of detector dogs but incorporating dogs into container parks and deconsolidation locations is difficult. There is the Biosecurity Innovations and Research programme/division that is investigating options with research partners.

Question: Can you tell just from looking at a container if khapra is in the container?

- **Answer:** Generally not. They are small and cryptic, and tend to hide in cracks and crevices within a container and therefore are too hard to detect just from an external visual inspection. We have detected Khapra on external surfaces of a container, but this is not a common occurrence and required molecular diagnostics to confirm the identity.

Question: How many khapra beetle detections have been from India?

- **Answer:** In line with the International Plant Protection Convention (IPPC) provisions, the department notifies the relevant National Plant Protection Organisation (NPPO) when significant regulated pests are detected. Further information about khapra beetle detections may be obtained by contacting the relevant NPPO in the country of export.

Question: If a contaminated container arrived from non-khapra country, would the country need to reconfirm khapra free status?

- **Answer:** The guidelines for notifying significant failures of consignments to comply with specified phytosanitary import requirements are stipulated in the IPPC's International Standards for Phytosanitary Measures.

Verification & certification

Question: Will onshore biosecurity inspections continue or will certificates replace inspections?

- **Answer:** For containers which comply with the khapra measures, there will not be any khapra specific post-treatment verification inspections under Phase 6A. However, inspections will still be required for high-risk plant products where stipulated in the import conditions, as well as inspections of rural destined containers.

Question: Is a generic heat treatment certificate allowed or must it be an approved government phytosanitary certificate?

- **Answer:** The heat treatment certificate must meet the minimum requirements in the department's heat treatment methodology. We will detail any additional documentation requirements in BICON and on our website. Regarding phytosanitary certification - we are encouraging involvement of NPPOs but will also require certificates from commercial treatment providers.

Question: Do empty containers need a phytosanitary certificate?

- **Answer:** It is not a requirement that treatments for containers under Phase 6A of the khapra beetle urgent actions are certified on a phytosanitary certificate, but if they do it must also have a treatment certificate from a commercial treatment provider.

Question: If we have done MB offshore and have a fumigation certificate, is that all that is required?

- **Answer:** For the container treatments yes, but any other standard requirements for your goods still apply. Importers should always check BICON for the full conditions. Also, if the fumigation is conducted in an AFAS country, the treatment provider must be an AFAS registered provider. The department is mandating that the department's treatment methodologies are followed for all Phase 6A treatments, and that minimum documentary requirements are met. We are also developing a methodology for insecticide spray.

Treatments

Question: How long does methyl bromide fumigation or any of the other treatments remain effective?

- **Answer:** Methyl bromide is effective at killing khapra beetle at the time of treatment; there is no residual effect from the treatment (i.e. it doesn't protect from subsequent infestations). As long as the treatment is conducted and the container is exported within 21 days of the treatment, it is accepted. It would be prudent for industry to ensure that the containers are kept in hygienic conditions prior to export to reduce infestation.

Question: Mandatory offshore treatment is ok if the ambient temperatures allow, if this is not possible will onshore treatment be allowed?

- **Answer:** Onshore treatments will not be available in these instances. If required, a methyl bromide treatment area can be heated. The department is conscious that not all treatments will be possible, and other treatment options are encouraged to be used in these instances.

Question: Is fumigation proven to be effective for khapra in or under floors of containers?

- **Answer:** In short yes, if the requirements of the methodology are followed regarding sufficient exposure, temperature, and time, then yes it will. In addition this is why the department will be mandating fumigation under a sheet to ensure sufficient underside access.

Question: We provide brown marmorated stink bug heat treatments onshore under class 12.3. We want to offer our services offshore too, who can we contact?

- **Answer:** If it is for offshore, not onshore, the best email is offshoretreatments@agriculture.gov.au.

Question: If khapra can diapause for years, how is heat treatment effective? Can it withstand the heat if it goes into diapause?

- **Answer:** No it cannot withstand the heat. The stated rate is effective to kill. The treatment rates are based on science.

Question: Will controlled atmospheric treatments be considered in the future?

- **Answer:** We need efficacy data to consider these treatments, if people have efficacy data to demonstrate that it is an effective treatment, provide this to imports@agriculture.gov.au for consideration.

Question: The department website says that more details regarding heat and insecticide treatments will be provided on the website, when will this happen?

- **Answer:** We recognise importance of providing information and updating the BICON cases, as well as confirming methodologies. We are working on these as a priority.

We are not talking about large changes to the heat treatment methodology. Heat treatment providers are strongly encouraged to register with [BMSB scheme](#).

An insecticide spray methodology is being developed. We are also encouraging insecticide spray treatment providers to register interest by contacting offshoretreatments@agriculture.gov.au to establish a relationship with us. This will enable us to be able to provide information directly to them as quickly as possible.

Industry is encouraged to keep checking the website as it is being updated regularly. They can also register for IAN and BICON alerts.

Question: I have high-risk plant products from a khapra beetle country. The empty container must be treated as discussed, but does the loaded container need treatment once loaded?

- **Answer:** Khapra treatment requirements for Phase 6A are for containers only. If you would like to treat the goods and containers at the same time, methyl bromide can be used, but if the container is treated prior to loading, both the container and goods don't need to be treated again once loaded.

Question: Is there a long-lasting insecticide treatment/residual?

- **Answer:** Of the 3 treatment options, heat and methyl bromide have no residual effect. Contact spray literature indicates it can last for 2-3 months, but there is no known other spray with a longer lasting effect than pyrethroids. External surfaces are exposed to the elements, therefore impacting residual effectiveness.

It is important to clean the container prior to treating. If you can clean the surface and allow it to dry, the insecticide will adhere to the surface.

It is also important to note that biosecurity is a shared responsibility, and the department encourages industry to put forward suggestions regarding residual treatments/innovations to manage khapra risk.

Commodity/goods

NOTE: the target of the treatment under Phase 6A of the khapra beetle urgent actions is the **container** and **not the goods/commodity** being shipped within the container.

Question: I am confused as to whether the measures are about containers or cargo

- **Answer:** From a risk management point of view, we are focusing on the container risk. In terms of selecting and defining the containers we will be targeting, that is where the link between containers and the goods/cargo come in. For Phase 6A, FCL/FCX containers that are to be packed with high-risk goods need to be treated; also FCL/FCX containers that are to be packed with other goods in a khapra beetle target country and destined for a rural grain growing area of Australia also need to be treated.

Question: Are there any onshore treatment options for products (e.g. non-retorted, non-viable milled rice) that arrive from a khapra country without a valid phytosanitary cert?

- **Answer:** Currently if an FCL container of rice came from India without a phytosanitary certificate, we would inspect and treat if needed (provided the goods could be effectively treated). However, we will be tightening the phytosanitary requirements for plant products from khapra countries, onshore allowed now, but it may change later this year (i.e. this is **not** part of Phase 6A measures).

Question: Regarding the commodity measures, would the department consider cold treatment? As organic chickpeas cannot be fumigated and cannot be heat treated.

- **Answer:** Khapra needs well below -32/54°C to kill. Hence, the heat treatment option is being given as we know it will kill. Heat treatment would need to be done prior to loading goods. As noted above, the target of the treatment under Phase 6A of the khapra beetle urgent actions is the container and not the goods/commodity being shipped within the container.

Question: For high-risk products that need moist heat treatment at a class 4.1, could offshore treatment be considered?

- **Answer:** The Phase 6A measures are for **containers** only. If there is a comparison with the heat treatments, write to us at the import's inbox (imports@agriculture.gov.au). We will also be putting up some case studies online.

Question: Goods that are subject to import permits, e.g. pet food, will conditions change?

- **Answer:** Yes, they will be reviewed, but done on a case-by-case basis. More so when we are looking at making the changes to commodities, not under Phase 6A.

Organic products

NOTE: the target of the treatment under Phase 6A of the khapra beetle urgent actions is the **container** and **not the goods/commodity** being shipped within the container.

Question: For organic seeds treatment options 2 and 3 would not be acceptable. Option 1 is not available in many countries!

- **Answer:** The department recognises that not all options are available in all countries and has therefore provided a range of treatment options. Heat treatment is to be conducted on containers prior to loading, with the insecticide treatment to be conducted in combination with a liner and as well as requiring goods to be bagged.

Question: Is there an organic produce exemption?

- **Answer: For Phase 6A, treatments can be done on containers prior to packing with the goods.** The insecticide spray will be used with a liner and bagged products only to minimise any cross-contamination of the goods. Encouraged suggestions to the inbox and reiterated that treatments are for the containers only, heat treatment is not an option for loaded containers.

Question: What options are there for organic rice as organic status does not allow methyl bromide fumigation?

- **Answer:** As the target of the treatment is the container, the container could be treated and then packed after a time to let residue dissipate.

Question: What are the requirements for organic agricultural product?

- **Answer:** In later phases of the urgent actions (i.e. **not Phase 6A**), phytosanitary requirements will tighten for plant products, will look to impose treatments on those commodities and any other alternatives. For those phases, there is the potential for looking at a systems approach, using multiple control points through a supply chain to manage the risk to assist in concerns around certain treatments in the future.

Other phases of the khapra beetle urgent actions/other schemes

Question: Can you provide more info on Phase 6B?

- **Answer:** Phase 6B will apply to containers that have held high-risk plant products over a 5-year period as these are the containers which tracing has identified as being high risk. Currently there is no data repository to inform which containers these are. The department is working with industry, investigating data aggregators etc. to see how we can get this information to implement 6B. A peak industry working group has been established to investigate ways to identify high risk containers, or if that is not possible, what policy can be developed to manage the risk. No immediate solution is available.

Assuming we can identify the high-risk containers, we still need to determine what proportion of the pathway the high-risk containers make up. Dependant on this, the Phase 6B measures could be onshore/offshore. There is also innovation on alternate ways to detect the presence of khapra, but this depends on advancement by 6B as to how this will inform the available management options.

This is a global problem, and we are working with a number of countries and international organisations to see if there is a way to address this container issue as part of the existing supply chain. If we can't get access to the data, then an alternative policy would need to be considered. At this stage, it depends on the availability of data.

Question: For Phase 6B, how is the department going to gather data for containers? Will this be supplied by shipping lines?

- **Answer:** Yes, 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. Data aggregators only capture a portion of the data. One country has legislated that shipping lines provide container history. We are investigating this too. Currently there is no clear source for all of this information and data.

Question: How does one find out if the container was used for grain in the last 5 years?

- **Answer:** Currently there is no clear source for all of this information and data. Shipping lines do capture some information, but to proactively target those containers before entering Australia is problematic. There are limitations on data records and differences in format. This is the biggest challenge, but we have consulted with WCO and global shipping lines and IMO, but there is no central repository at this stage to help. If you can assist at all, please contact us at imports@agriculture.gov.au.

Question: Can you provide further information on the Sea Container Hygiene System and opportunities/tie ins/industry collaboration?

- **Answer:** In the [Sea Container Hygiene System](#) (SCHS), the pyrethroid used is applied to the container surfaces, usually underside and/or side. Private companies established those systems. We have found khapra from a SCHS port. Therefore we have considered what changes, if any, might be required for the SCHS. Given it is jointly held with New Zealand's Ministry for Primary Industries, we have had high level policy discussions. As part of this we will consult with the technical experts regarding any changes and before any changes are made to the SCHS criteria. Discussions are ongoing, but no policy position landed on as yet.

Australian exports

Question: I understand that this session is about imports but should companies exporting grain in containers also be taking any extra precautions?

- **Answer:** Part of export industry discussions have been around options and treatments to provide countries of import with assurance around the management of khapra risk. The outcomes of discussions so far could not be confirmed however, they are continuing in this space.

Question: Can I contact group regarding containerised grain export team for information?

- **Answer:** Contact imports@agriculture.gov.au

Question: Containers destined for urban areas with low-risk cargo, then goes to rural to be stocked with grain, is there any treatment in between? Advice for grain handlers up country? (exports?)

Answer: There are target risk containers based on historical data, those that have held high risk goods., if those containers are then used to transport general goods, that is where the cross contamination can occur. As part of 6B measures it is those that we will focus on to manage the risk before the container enters Australian territory. Assuming that the question is around exports, the department has been engaging with grain production sectors, we have a grain and plant export consultative committee. Before we export grain, the container has to be certified as hygienic. The grain industry is reluctant to apply a treatment prior to loading, however we are communicating the risk and allow voluntary treatment and encourage that clean containers are acquired. We will continue to work with grain grower bodies such as Grain Growers Limited, Grain Producers Australia and the Grain Research and Development Corporation.

Presentation & communication

Question: Can we download the PowerPoint presentation?

- **Answer:** It will be made available on the website.

Question: Are you putting a concise info package together for importers?

- **Answer:** Prior to implementation we will look to do fact sheets and infographics. We also encourage suggestions from industry on other communication products.

Question: When will BICON be updated?

- **Answer:** We are working on this as a priority and we hope to have the updated heat methodology and the guidelines for the insecticide spray and BICON updated as soon as possible. Understand the importance for industry to access this information. We will be

publishing BICON notifications, Industry Advice Notices, webpages and SPS notifications however, BICON will not go live until 12 April 2021.