

15th October 2026

The Director
Live Import List Section
National Environmental Protection Agency
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Import of Blaptica dubia for commercial pet purposes

Animal Care Australia is a national incorporated association established to consult with government in advocating for real animal welfare by those who keep, breed and care for animals. Our goal is to promote and encourage high standards in all interactions with the animals in our care.

Animal Care Australia represents the keepers of a wide range of animal species, including pets, companion animals, animals used for educational or entertainment purposes or kept for conservation. In particular, reptile, bird and arachnid keepers and breeders.

Animal Care Australia supports the application by the Pet Industry Association of Australia to amend the List of Specimens Taken to be Suitable for Live Import (Live) for inclusion of the Dubia Roach (*blaptica dubia* Serville, 1838).

Animal Care Australia looks forward to the not-too-distant future where keepers and breeders of reptiles, birds and arachnids can once again return to providing the Dubia Roach as an integral and enriching component of their animals' feeding rituals and diet. To achieve this, the Government and department must approve the Import of Dubia Roach for commercial purposes.

Animal Care Australia has responded to the Environment Protection and Biodiversity Conservation Act 1999 (Cth), Part 13A, Terms of Reference for Other Species (Live Import List) in the attached submission. This submission can be publicly listed.

Should you require further details please do not hesitate to reach out as we would be happy to meet with you and further discuss this matter.

Kind regards,



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About Animal Care Australia

As a nationally recognised animal welfare organisation and Australian Registered Charity, Animal Care Australia encourages continued development of animal welfare standards and Codes of Practice for animal husbandry, breeding, training, sale, and sporting exhibitions for a wide range of animal species, including pets, animals used for educational or entertainment purposes or kept for conservation, and in particular native birds, reptiles, and mammals.

Animal Care Australia was founded in early 2018 to establish an organisation run solely by volunteers to lobby for real animal welfare. With extreme animal rights and animal liberationist ideologies influencing government legislation, regulation, and policy at our expense and to the detriment of our animals and pets, it has become necessary to provide government with a balancing voice.

By uniting the broad spectrum of animal groups, collectively we offer an experienced, sensible approach to animal welfare.

By educating our members and the public about the importance of treating animals with kindness and respect for their needs and promoting the humane treatment of animals to improve animal welfare outcomes, Animal Care Australia is in the unique position of lobbying and advocating for all animals within our care.

Animal Care Australia provides priority to the following:

- advocating for stronger welfare outcomes
- advocating to increase education of the public in animal welfare and best care techniques
- educate the public on handling their animals with kindness & respect and the importance of their needs
- educate the public in the differences between animal welfare and animal rights

Import of *Blaptica dubia* for commercial pet purposes





Animal Care Australia (ACA) is a national incorporated association and registered charity representing the interests of animal keepers, carers, and breeders across a broad range of species.

Animal Care Australia 's purpose is to prevent and relieve animal suffering through education and advocacy, promoting responsible animal care and improved welfare outcomes. Established by experienced animal advocates, Animal Care Australia provides a trusted, evidence-based voice to government and the community.

Animal Care Australia brings together practical experience, species-specific knowledge and contemporary animal welfare principles. We advocate for evidence-based proportionate policies that focus on achieving genuine welfare outcomes for animals. We seek to ensure that the voices and experiences of responsible animal carers are considered in the development of effective animal welfare policy.

Animal Care Australia unites hobbyists, pet owners, and major animal groups to promote high standards of husbandry and safeguard the human-animal bond.

True animal welfare is best driven by education and practical expertise rather than restrictive regulation.

*Our guiding principle is simple: **animal welfare is animal care***

Submission approved: 16th October 2026

This submission has been developed in consultation with a range of members of Animal Care Australia.

This submission provides a broad perspective across all species of pets and companion animals. Animal Care Australia supports the species specific submissions of our member organisations.

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Table of Contents

Opening statement	5
Key position taken:	6
Community impact	7
Response to the Term of Reference	7
TOR 1 - Proposed Purpose and Source of Import	7
TOR 2 - Taxonomy	7
TOR 3 - Genetic Modification	8
TOR 4 - Identification	8
TOR 5 - Body Size and Sexual Dimorphism	8
TOR 6 - Geographic Distribution	8
TOR 7 - Habitat	9
TOR 8 - Diet and Feeding Behaviour	9
TOR 9 - Does Feeding or Other Behaviours Reduce Habitat Quality?	9
TOR 10 - Lifespan and Sexual Maturity	9
TOR 11 - Fecundity and Breeding	10
TOR 12 - Asexual Reproduction and Sperm Storage	10
TOR 13 - Hybridisation	10
TOR 14 - Adaptations Enhancing Establishment or Predation	10
TOR 15 - Environmental Tolerances	11
TOR 16 - Presence and Establishment in Australia	11
TOR 17 - Commonwealth, State and Territory Legislative Controls	11
TOR 18 - IUCN Red List Status	11
TOR 19 - CITES Status	12
TOR 20 - Migratory Status	12
TOR 21 - CMS Status	12
TOR 22 - Harmful Characteristics and Human Health Risk	12

Import of *Blaptica dubia* for commercial pet purposes

TOR 23 - Captive Status and Public Safety	12
TOR 24 - Climatic Similarity	13
TOR 25 - Establishment Outside Native Range	13
TOR 26 - Tolerance of Environmental Disturbance	13
TOR 27 - Reported Impacts on Native Species	14
TOR 28 - Damage to Crops and Primary Production	14
TOR 29 - Risk of Deliberate Release	14
TOR 30 - Likely Diet Following Establishment	14
TOR 31 - Competition with Native Species	14
TOR 32 - Habitat and Ecological Community Changes	15
TOR 33 - Potential Social and Cultural Impacts	15
TOR 34 - Potential Economic Impacts	16
TOR 35 - Proposed Conditions and Restrictions	16
TOR 36 - Guidelines for Keeping, Transport and Containment	17
<i>Conclusion and Recommendation from Animal Care Australia</i>	19
<i>Glossary</i>	21

Opening statement

As a nationally recognised animal welfare organisation, Animal Care Australia supports the application by the Pet Industry Association of Australia to amend the List of Specimens Taken to be Suitable for Live Import (Live) for inclusion of the Dubia Roach (*blaptica dubia* Serville, 1838) for commercial purposes.

Our core objectives relevant to this submission are:

- ✓ To represent animal care groups as the peak animal welfare body
- ✓ To engage and advise Government on welfare issues relating to pets and companion animals
- ✓ To protect the rights of ethical hobbyists and animal keepers to breed and keep pets and companion animals
- ✓ To promote welfare education and outcomes over regulation
- ✓ To promote and encourage high standards in all interactions with animals in our care

In this submission Animal Care Australia has responded to the Environment Protection and Biodiversity Conservation Act 1999 (Cth), Part 13A, Terms of Reference for Other Species (Live Import List).

While Animal Care Australia supports biosecurity safeguards and compliance with Australia's import legislation, the recent compliance and enforcement action by Department of Climate Change, Energy, the Environment and Water (DCCEEW) officers attending the premises of domestic Dubia Roach traders has yet again highlighted the inconsistencies between federal and state departments relating to the keeping or trading of exotic species.

State government agencies (other than Tasmania) have, to date, continually permitted the commercial trade of the Dubia Roach. Denial by federal officers that this is not the case is outrightly opposed by the traders who were subject to raids, by the numerous pet store owners forced to remove perfectly viable stock from their shelves and by the countless pet owners who regularly utilised the roaches as the main staple of their pets feeding regimes. What is more surprising is that while the market in Dubia Roach has predominantly exploded over the past few years, the roaches have been used consistently for approximately twenty years, with some of our major zoos being the first to legally import them. On that basis this entire process seems to be one designed to cover up the fact that a few rogue DCCEEW officers took matters into their own hands and in doing so created unfavourable media coverage for the department and the Minister.

Import of *Blaptica dubia* for commercial pet purposes

Key position taken:

- Animal Care Australia SUPPORTS Part 2 listing
- *B. dubia* is not CITES-listed, not IUCN-listed, not a known pest, not venomous, cannot fly, cannot climb smooth surfaces, is slow-moving, and has NO confirmed self-sustaining wild population anywhere outside its native South American range despite decades of massive global commercial trade (including in subtropical Florida, USA).
- The species has been continually present in Australia at commercial scale, bred entirely domestically, sold openly, and used by Taronga Zoo and Melbourne Zoo for optimal nutrition of reptiles, primates, and critically endangered birds.
- The trade arose in good faith. NSW Department of Primary Industries and Regional Development confirmed in writing in February 2025 that *B. dubia* is NOT prohibited matter under Schedule 2 of the NSW Biosecurity Act 2015 and may be legally kept in NSW. Equivalent positions exist in Victoria, Queensland, South Australia, and Western Australia. Tasmania is the exception with an explicit import ban.
- The recent DCCEEW seizure of >100,000 specimens at Bathurst (26 May 2026) has caused panic, financial loss, and perverse biosecurity incentives. This enforcement action against a widely distributed captive species has drastically increased the probability of uncontrolled release and is driving trade underground.
- From an animal welfare perspective, *B. dubia* is superior to the other common legal alternative – crickets (*Acheta domesticus*). Dubia Roach have lower odour, no noise, cannot escape easily, and lower parasite vector risk. While crickets transmit coccidian oocysts (*Isospora amphiboluri*, *Choleoeimeria pogonae*) at significantly higher rates than *B. dubia*.

From Animal Care Australia's perspective, this case is a textbook example of why welfare-led, keeper-informed policy is essential. The current enforcement posture against Dubia Roaches following, state-sanctioned trade that supports the welfare of countless reptiles, amphibians, birds, and arachnid keepers is causing real welfare harm to the species dependent on them, while increasing biosecurity risk.

A regulated pathway is both a better welfare and a better biosecurity outcome.

Community impact

The Dubia Roach has been commercially produced and traded across most of mainland Australia – with Tasmania the only exception. They have been openly sold by a strong number of distributors and pet retailers across the country.

Aviculturists who keep certain species such as kingfisher, frogmouth, and other insectivores, along with insect keepers (such as owners of arachnids) make up a small portion of the Dubia Roach consumer market, however, the largest proportion are reptile and amphibian owners/keepers/breeders. With estimates of up to 500,000 households keeping at least one reptile as a pet,¹ the impact of a complete ban would be wide-reaching and Animal Care Australia has concerns as to the broader animal welfare impact this would have, especially given the increasing interest and growth in reptile ownership. As highlighted further in this submission the nutritional value and ease as prey are exceptionally higher than crickets and Australian roaches. Additionally, mealworms and crickets have been acknowledged by all relevant government departments as widely established exotic species that remain legal, so why are we suddenly pursuing the Dubia Roach as being any different?

Response to the Term of Reference

TOR 1 - Proposed Purpose and Source of Import

Animal Care Australia supports listing for the purpose of regularisation and legal recognition.

The proposed purpose is commercial production and supply as a premium live feeder insect for reptiles, amphibians, insectivorous birds, and mammals, together with renewed use in zoos, wildlife rehabilitation, research, and other controlled settings.

No immediate overseas import is sought. Future imports, if needed for genetic refreshment, would be captive bred from USA/EU commercial lines, and of course, subject to standard import legislation and quarantine. There is no requirement for wild harvest. Excess progeny IS the commercial product. Colony management would be the responsibility of commercial retailers/breeders, private keepers and via use in zoos, wildlife rehabilitation, research, and other controlled settings.

TOR 2 - Taxonomy

The accepted name is *Blaptica dubia* (Serville, 1838), commonly called the dubia

¹ [Animal Medicines Australia](#)

Import of *Blaptica dubia* for commercial pet purposes

roach, orange-spotted cockroach or Argentine wood roach.

Classification is: Animalia; Arthropoda; Insecta; Blattodea; Blaberidae; Blaberinae; *Blaptica*; *B. dubia*.

NCBI records the species under taxon ID 132935 ²

There is no Australian congener. No confusion with native burrowing woodroaches (*Geoscapheinae*/*Panesthiinae*).

TOR 3 - Genetic Modification

All Australian stock are captive-bred, non-genetically modified individuals. No transgenic or gene-edited commercial lines are identified.

TOR 4 - Identification

Adults are identifiable by their dark brown to black body, orange or amber spotting and characteristic sexual dimorphism.

Distinguished from *Periplaneta*, *Blatta*, *Blaberus*, *Eublaberus*, *Gromphadorhina* by their 40-45mm size, orange spotting, ovoviviparity, absence of arolia (cannot climb smooth surfaces) which is a critical containment trait that makes it preferred by zoos over crickets.

TOR 5 - Body Size and Sexual Dimorphism

Adult males: 38-45mm, fully winged but gliding only, no powered flight.

Adult females 35-42mm, vestigial wing stubs, broader abdomen, flightless.

Nymphs are more difficult to identify, particularly at early instars. 3mm white at hatch darkening to brown, 35-38mm at instar 7.

TOR 6 - Geographic Distribution

Native: Central and South America – Brazil, Argentina, Uruguay, Paraguay with popular attributions to Guyana/Venezuela. Range spans humid subtropical and tropical Atlantic Forest.

There are no established feral populations outside native range despite global trade. Only field record outside native range is Kato & Yamasako (in 2020) as a single detection in temperate Japan. Appears to have no confirmed persisting population.

In Australia: captive only, no wild records.

² [NCBI record](#)

TOR 7 - Habitat

Native: forest floor leaf litter, decaying wood, under bark, warm dark aggregations.

Requirements: 29-35°C optimal reproduction, breeding ceases <20°C, nymph development fails <20°C constant. Humidity is needed for moult but tolerant of low humidity via food moisture.

In captivity it is normally maintained in enclosed smooth-sided lidded tubs with egg-crate harbourage, warmth (28-35°C), and food moisture rather than free-standing water.

TOR 8 - Diet and Feeding Behaviour

The species is primarily detritivorous and frugivorous. Reported foods include decaying fruit, leaf litter, soft plant material, bark, rotting wood, and grain-based feeds. Captive diets can include vegetables, fruit and formulated insect feed, and the species is not predatory.

Frugivorous preference: carrot, apple, banana, papaya, leafy greens, bran, pellets. Avoids high-protein animal matter.

TOR 9 - Does Feeding or Other Behaviours Reduce Habitat Quality?

There is no published evidence of reduced habitat quality. This species:

- does not consume live plants,
- does not burrow extensively,
- does not alter soil structure or cause erosion
- does not damage living vegetation or timber, and
- gregarious aggregation in dark retreats means escaped individuals cluster rather than disperse, limiting habitat impact.

TOR 10 - Lifespan and Sexual Maturity

Under favourable captive conditions, the reported life cycle is approximately 1.5–2 years. Development includes seven nymphal instars.

Laboratory work found successful development to adulthood at 20°C, 25°C and 30°C, while constant 35°C and 40°C treatments caused substantial juvenile mortality before adulthood.³

³ [National Library of Medicine](#)

Sexual maturity is reached after the final moult. The exact age depends on temperature, nutrition, density, and sex; a fixed age should not be used as the sole management trigger.

Gestation 28-64 days temperature dependent (48-64 days at 26°C 12:12).

Success to adult fails at 35°C (dies before instar 5) and if at 40°C (dies before instar 2).

Under 28-32°C, maturity in 4-6 months. Female receptive ~5 days post adult moult.

TOR 11 - Fecundity and Breeding

B. dubia is ovoviviparous: the female retains the ootheca and gives birth to live nymphs. The earlier report gives typical litters of approximately 20–40 nymphs and repeated reproduction under favourable conditions.

Animal Care Australia finds those figures are plausible for captive production but should be treated as ranges, not guaranteed outputs.

Fecundity is temperature-, nutrition- and density-dependent. Commercial colonies can increase rapidly when warm and well fed, maintaining necessary output for trade.

TOR 12 - Asexual Reproduction and Sperm Storage

The species is not known to reproduce by parthenogenesis and requires male and female individuals for ongoing reproduction. Females may retain sperm and produce an additional litter after mating.

TOR 13 - Hybridisation

No reliable evidence has been identified of *B. dubia* hybridising in the wild with another species. The genus is generally treated as containing *B. dubia* as its recognised species. Hybridisation with Australian native cockroaches appears unlikely because Australian native blaberid lineages are taxonomically and ecologically distinct.

TOR 14 - Adaptations Enhancing Establishment or Predation

The species is not a predator and has no known adaptation for attacking vertebrates or crops.

Countervailing traits include dependence on suitable warmth, shelter, and moisture; limited dispersal ability; inability to climb smooth surfaces; and the absence of a confirmed established population outside the native range. While a possible overall conclusion could be claimed by the Invasive Species Council as it being potentially capable of local establishment in suitable warm refuges, there is no demonstrated

evidence for the species to be a readily establishing invasive species – only theoretical.

TOR 15 - Environmental Tolerances

As previously stated, development and breeding are strongly temperature dependent.⁴ Nymphs can develop at approximately 20–30°C, while higher temperatures and prolonged cold or desiccation cause mortality.

The species can obtain moisture from food and does not require open drinking water. It should not be described as drought-proof: prolonged lack of moist food, low humidity, cold periods, or exposure without shelter would be expected to reduce survival.

TOR 16 - Presence and Establishment in Australia

At present there is captive trade only across mainland Australia, with Tasmania (explicit state ban on import from mainland). There is no published wild record, no feral population, and the species is not listed as an established pest in Australian biosecurity databases.

Animal Care Australia notes (Lassaline et al. 2026⁵) Australia's border interception analysis highlights Australia's biosecurity measures as one of the most robust in the world. Approved importing with regulated transparent frameworks enable monitoring and go a long way to prevent driving trade underground, subsequently reducing any biosecurity risks.

TOR 17 - Commonwealth, State and Territory Legislative Controls

Commonwealth: EPBC Act where currently not on Live Import List. Biosecurity Act 2015: any future import requires DAFF BICON IRA approvals.

States: Vary in wording however, NSW – NOT prohibited matter Schedule 2 Biosecurity Act 2015 NSW. Checking Victoria, Qld, SA, WA, NT, ACT biosecurity acts, and there is no specific prohibition. The only exception is where Tasmania explicitly prohibited entry from mainland under their state biosecurity act.

TOR 18 - IUCN Red List Status

B. dubia is not assessed and not listed.

The species is a secure commercially abundant captive-bred globally with stable wild populations in South America. There is no recorded conservation concern and is not subject to wild unsustainable harvest.

⁴ [National library of medicine](#)

⁵ [NeoBiota](#)

TOR 19 - CITES Status

Not listed on any Appendix (CITES 2025), making the species eligible for either Part 1 or Part 2 of Live Import List under s303EB(5). Animal Care Australia acknowledges the current application seeks Part 2 with conditions that are proportionate given the manageable risk profile.

TOR 20 - Migratory Status

B. dubia is not migratory. It is a sedentary forest-floor detritivore with no seasonal movements and is flightless. Individuals rarely disperse beyond colony without human assistance.

TOR 21 - CMS Status

Because the species is not migratory, the Convention on the Conservation of Migratory Species is not materially relevant. No CMS listing has been identified.

TOR 22 - Harmful Characteristics and Human Health Risk

The species is not known to be venomous, poisonous, aggressive, or capable of biting or stinging humans in a medically significant way. The principal documented human-health concern is occupational allergy.

A published case report described respiratory symptoms and IgE sensitisation in a commercial *B. dubia* breeder, although there was also partial cross-reactivity with *Periplaneta americana*.⁶ In light of this, commercial facilities should use ventilation, hand hygiene, cleaning, pest exclusion, feed controls, and appropriate personal protective equipment where dust, frass or repeated exposure creates a risk.

B. dubia is not a vector for notifiable human/animal disease, it does not bite or blood-feed. Unlike synanthropic *B. germanica*/*P. americana*, it is not found in human food prep/sanitation areas.

TOR 23 - Captive Status and Public Safety

The species is widely kept as a feeder insect and has been used in laboratory research. Captive specimens pose low direct physical risk to the public because they are small, non-aggressive and not venomous. Has been kept in Australia domestic feeder trade.

The relevant public-safety risks are indirect: unlikely escape, allergen exposure, contamination of food or animal housing, and unlawful movement. Public safety

⁶ [National Library of Medicine](#)

negligible: not aggressive, no toxins, cannot climb smooth, no sustained flight – readily contained, less risk than crickets.

TOR 24 - Climatic Similarity

Parts of northern Queensland, the Northern Territory and northern Western Australia have warm climates that may be comparable to parts of the species' native range. Coastal and sub-coastal areas may provide suitable combinations of warmth, humidity, and shelter. Much of southern Australia is less suitable at a regional climate level

Animal Care Australia would support zoned conditions with enhanced containment in tropics/subtropic regions, but this recognition does not and should not negate the suitability of Dubia Roach as live feeder available in Australia.

TOR 25 - Establishment Outside Native Range

There are no confirmed self-sustaining populations outside South America. A 2020 paper reported a field record of *B. dubia* in a temperate part of Japan, but a field record is not equivalent to a demonstrated persistent population.⁷ Animal Care Australia highlights there were no further records of this sighting or in other locations.

Animal Care Australia notes a Florida ban was placed in a precautionary step without any evidence-based justification.

Given the wide use of Dubia Roach as a feeder insect, the overall absence of reports reflects a genuine failure to establish outside of its native range.

TOR 26 - Tolerance of Environmental Disturbance

The species tolerates artificial captive environments, varied organic diets and enclosed structures. This shows husbandry flexibility but does not prove that it benefits from urban disturbance. It is not established as a typical indoor pest like *Blattella germanica* or *Periplaneta americana*.

Equally the species is NOT synanthropic. It is not associated with human dwellings, kitchens, sewers, refuse, food storage in its native or any introduced range. It does not infest structures unlike *B. germanica*/*P. americana* which are successful urban pests via peridomestic adaptation.

During drought/desiccation it can tolerate low humidity via food water but prolonged desiccation without moist food proves fatal. Australia's variable rainfall and extended

⁷ [Entomological Science](#)

drought would place significant stress on any escapee.

TOR 27 - Reported Impacts on Native Species

No documented declines in native species, wildlife predation, herbivory, or competitive exclusion are identified. The species is not reported as a pest in its native range or elsewhere.

There is a functional niche identical to native Geoscapheinae/Panesthiinae detritivores, however competitive displacement would require direct microhabitat overlapping over time and this purely speculative, especially given there is no evidence globally, including USA where escapes have previously occurred.

TOR 28 - Damage to Crops and Primary Production

Globally, there is no documented evidence of damage to crops, horticulture, stored grain, or fodder. The species does not attack domestic/commercial animals, plants, or infrastructure. The absence of arolia prevents climbing smooth storage, silos, packaging, etc. This further reduces any theoretical stored product contamination risk.

TOR 29 - Risk of Deliberate Release

Deliberate release appears less likely than accidental escape because the species has a high commercial value in captivity and little obvious value after release. However, release risk is not zero. Reasons for release may include business failure, enforcement action, poor advice, unwanted progeny, colony disposal, or owner disengagement.

The most effective controls are accessible legal information, a documented surrender or transfer pathway, retailer advice, secure disposal, accountability for commercial operators and proportionate enforcement.

Animal Care Australia strongly believes an ongoing prohibition with no practical surrender pathway or ability to continue to utilise the *B. dubia* as a live feeder, will increase concealment, privately held populations and therefore unmanaged disposal.

TOR 30 - Likely Diet Following Establishment

In suitable Australian environments, the likely diet would be fallen and decaying fruit, leaf litter, soft plant matter, bark, fungi-associated material, and other decomposing organic matter. There is no predatory diet involving threatened Australian vertebrates expected from the species' known biology.

TOR 31 - Competition with Native Species

Australia has a diverse native cockroach fauna, including native blaberid lineages such

as Panesthiinae and Geoscaphinae.

Studies of Australian blaberid evolution describe native groups associated with decaying wood and soil or leaf-litter environments.⁸

If *B. dubia* established in warm areas, possible competition would involve decaying plant food, moisture, shelter, and space in forest-floor or sheltered microhabitats. The degree of overlap is uncertain, especially given native burrowing or wood-feeding species use different microhabitats (i.e., underground/burrowed), while *B. dubia* is more surface-associated.

There is no threatened native competitor identified in the evidence reviewed by Animal Care Australia. Equally there is no evidence globally of competitive displacement, including USA escapes. Thermal constraints and the absence of documented global displacement as factors reduces the theoretical risk.

TOR 32 - Habitat and Ecological Community Changes

Any escapees would quickly be consumed by the multitude of native fauna reliant upon insect prey, such as reptiles, amphibians, birds, etc.

While some opposing organisations may state an additional prey resource as 'dangerous' and not necessarily beneficial because introduced prey can also change predator behaviour, it would take a substantial and maintained escapee colony/groups in order to have such a drastic change in behaviour.

It should again be noted *B. Dubia* would have wetland/aquatic/coastal use, with no water contamination, drainage alteration, aquatic biodiversity impact. Equally there is no burrowing or erosion potential. There is also no seedling consumption and no suppression of regeneration.

TOR 33 - Potential Social and Cultural Impacts

Absolute positive social impacts include:

- ✓ improved access to a feeder insect that is easier to contain than some alternatives
- ✓ support for responsible reptile and amphibian keeping

Listing would provide regulatory certainty for reptile keepers, feeder-insect producers, and related businesses. These benefits are extremely relevant to improved ongoing animal welfare and responsible care due to the reliable access to appropriate nutrition.

⁸ [National Library of Medicine](#)

Potential negative impacts include nuisance if colonies escape, public concern about cockroaches, public concern about allergen exposure, possible conflict between neighbours, and most importantly - distrust if the law is unclear or applied inconsistently. All of these can be offset with simple education and information availability.

There is obviously no species-specific Australian Indigenous cultural significance.

TOR 34 - Potential Economic Impacts

If established in tropics/subtropics:

- Crop damage negligible – no evidence globally
- Livestock negligible – not predatory
- Timber/forestry negligible – does not bore living wood
- Trade impacts negligible – no export biosecurity restrictions known relevant to *B. dubia*

Potential positive impacts include regulatory certainty for animal keepers, retailers, researchers and producers, and reduced incentives for clandestine trade. Removal of the legal ambiguity which is currently suppressing investment in professional infrastructure.

The provision of availability as a feeder insect would also be substantial as it supports reptile (and other species) health by reducing vet costs/mortality from inferior feeders.

TOR 35 - Proposed Conditions and Restrictions

In recognition of low-risk temperate south, moderate tropics/subtropics, Animal Care Australia proposes the following **Part 2** conditions:

1. **Separate DAFF approval.** Every future import must satisfy BICON, quarantine, treatment, packaging, disease and end-use requirements. A Live Import List amendment must not be presented as an import permit.
2. **Approved captive-bred source.** When importing, no wild-collected specimens; source colonies must be traceable. and subject to pre-export (from source) health and identity certification.
3. **Defined end uses.** Initially restrict imports to approved research, zoo, wildlife rehabilitation and (controlled) commercial breeding facilities until post-listing evidence supports broader access.
4. **Secure containment.** Use smooth-sided, escape-resistant containers with secure lids and mesh ventilation that prevents escape of nymphs.

- 5. Double containment for movement.** Use a sealed primary container inside a robust secondary container, with labelled documentation and escape-response instructions.
- 6. Commercial registration and records.** Require commercial breeding organisations to register and maintain basic records, via annual reporting.
- 7. No release.** Prohibit any intentional release of live specimens, viable reproductive material, frass, bedding or waste.
- 8. Waste controls.** Freeze, heat-treat, bag or otherwise treat waste using an approved method that reliably prevents survival of viable nymphs or oothecae.
- 9. Incident reporting.** Require rapid reporting of escapes or suspected wild detections, with a practical time limit such as 24–48 hours and an emergency response plan.
- 10. Geographic controls.** Apply stronger controls or exclusions where state or territory law prohibits the species or where formal climate and pathway assessment identifies elevated risk. Such as no outdoor containment without fully enclosed thermally managed structure; in Qld, NT, northern WA – double-door entry, documented escape prevention protocols.
- 11. Retailer and keeper education.** Provide clear care, containment, welfare, allergen, waste and legal-status information at point of sale.
- 12. Surrender and transfer pathway.** Establish a lawful, non-punitive mechanism for owners who can no longer maintain colonies, while retaining enforcement for intentional smuggling, deliberate release and serious non-compliance.
- 13. Review clause.** Require review after a defined period using escape reports, compliance data, surveillance and any new ecological evidence.

TOR 36 - Guidelines for Keeping, Transport and Containment

Transport (domestic):	sealed smooth-sided containers adequate ventilation preventing hypoxia but not escape, minimised transit time with temperature management, documentation identifying supplier, registration number, species identity.
Enclosure commercial:	smooth polycarbonate/acrylic/glass lidded ventilated, egg-crate vertical harbourage, 28-35°C thermostat controlled, fresh food every 2-3 days removed before decomposition, max ~200 adults per 60L, monthly cleaning/substrate replacement.
Sex ratios:	standard 1 male : 3-4 females maximising reproduction. Noting: Single-sex female colonies viable short-term but cease as stored sperm exhausted. Single-sex male colonies not reproductively active zero establishment risk.
Welfare:	adequate thermal range, harbourage, avoid prolonged

Import of *Blaptica dubia* for commercial pet purposes

desiccation, avoid extreme overcrowding – welfare conditions align with productivity.

The minimum husbandry guidance via a Code of Practice (COP) should require:

- Smooth-sided, escape-resistant containers with secure, well-fitted lids.
- Ventilation is sufficient for animal welfare but not large enough for nymph escape.
- Suitable temperature management, avoiding overheating and prolonged cold.
- Dry harbourage that allows normal sheltering, moulting and aggregation behaviour.
- Moisture supplied primarily through suitable food, with monitoring to prevent desiccation and mould.
- Fresh, appropriate food and removal of spoiled material.
- Stocking densities that permit normal movement, moulting and access to food and shelter.
- Routine cleaning that avoids unnecessary disturbance and prevents accumulation of contaminated waste.
- Humane handling and humane euthanasia or disposal where animals are injured, diseased or no longer required.
- Separation of colonies from food preparation, sensitive persons, and unrelated animal enclosures where practical.
- Hand hygiene, cleaning equipment, pest exclusion, and suitable personal protective equipment for intensive or dusty work.
- Transport in sealed primary and secondary containers, with temperature protection and records identifying the species, sender, and recipient.
- Immediate containment and reporting of any escape, including inspection of nearby warm, dark, and sheltered areas.

Animal Care Australia will assist the department in developing and promoting a Code of Practice for feeder insect husbandry developed via our Insect Representative. This COP would form part of the education and husbandry information distributed by retail traders.

These controls reflect Animal Care Australia's preference for education and practical expertise while retaining mandatory minimum standards where they are necessary for biosecurity and animal welfare.

Conclusion and Recommendation from Animal Care Australia

For Animal Care Australia, this matter sits at the intersection of animal welfare, responsible keeping, and sensible biosecurity.

The evidence supports a conditional assessment rather than either unrestricted importation or a conclusion based solely on the species' presence in international feeder-insect trade.

B. dubia is not venomous or predatory, has no demonstrated history of causing agricultural damage, and has not been shown by the sources reviewed to have established a persistent population outside its native range.

Animal Care Australia acknowledges it is reproductively capable and can survive in warm sheltered environments. That said, any theoretical impact would have no more, and indeed far less impact than already existing insects available via commercial traders.

Animal Care Australia supports a transparent evidence-based process moving forward that:

- ✓ keeps Part 2 permit controls.
- ✓ requires DAFF biosecurity approval for future importation.
- ✓ protects welfare through practical husbandry standards and via the actual provision of a highly nutritious feeder insect.
- ✓ provides education and a lawful surrender pathway; and,
- ✓ uses monitoring and review to test whether the controls work.

The evidence in this assessment supports:

- ✓ *B. dubia* is not a CITES, IUCN, pest, venomous or predatory risk
- ✓ has never established wild populations outside South America despite massive global propagule pressure, and is biologically constrained by no climb, no powered flight, slow movement and >20°C breeding threshold.
- ✓ it has already been present at large scale in Australia, bred transparently in good faith on State advice; used by Taronga and Melbourne Zoos and thousands of reptile keepers for optimal nutrition and welfare.
- ✓ the welfare outcome for reptiles, amphibians, birds, and other insectivores is demonstrably better with *B. dubia* than with crickets, native roaches, or mealworms primary due to lower parasite vectoring, better containment, and

Import of *Blaptica dubia* for commercial pet purposes

lower odour/noise.

- ✓ The biosecurity outcome is demonstrably better with regulation than without. As CBD Guiding Principle 12 and EPBC Act s391(2) precautionary principle dictate, when prevention is no longer available, containment and control via regulated framework is required. A decision not to list does not remove the domestic population; it removes visibility and management tools and increases release risk via enforcement-driven alarm.

Animal Care Australia therefore respectfully submits:

1. The DCCEEW approve the application to amend the Live Import List to include *Blaptica dubia* on Part 2 subject to conditions in TOR 35/36.
2. That enforcement action against domestic holders of Australian-bred stock be paused pending assessment, with a clear surrender/registration pathway to prevent further covert disposal.
3. That Tasmania's stricter island biosecurity settings be reviewed following any approval in order to ensure national availability of the *B. dubia* to all relevant pet owners, zoos, wildlife parks, etc.
4. That Animal Care Australia's Insect and Reptile Representatives be consulted in drafting final containment standards and purchaser information sheets, consistent with our ethos that welfare standards are best developed by those who keep, breed and care for animals.

Animal Care Australia reiterates support for full prosecution of any international smuggling. Our submission on proportionality relates solely to domestic Australian-bred stock. Regulating what is already here is not a concession to illegality – it is the responsible, welfare-aligned, biosecurity-sensible outcome.

Animal Care Australia welcomes any questions you may have as you continue to finalise this review. We welcome the opportunity to meet with the department, and the Minister.

This submission can be published in full on the website including the signatory's name.

On behalf of the Animal Care Australia Committee,



Michael Donnelly
President
Animal Care Australia

Glossary

BICON:	Australian Biosecurity Import Conditions
CITIES:	Convention on International Trade in Endangered Species of Wild Fauna and Flora
DAFF:	Department of Agriculture, Fisheries & Forestry (Aust)
DCCEEW:	Department of Climate Change, Energy, Environment & Water (Aust)
Detritivorous:	feeding on dead and decomposing organic material, such as rotting leaves, dead animal remains, and feces
IUCN:	International Union for Conservation of Nature – Red List
Ootheca:	(plural: oothecae) hardened protective egg case or mass produced by certain insects, most notably praying mantises and cockroaches
Nymph:	immature, growing stage of certain insects in biology