27 March 2026

1. Business Overview

This section introduces your business and provides context for your submission.

1. Company name:

   Location of operations: [redacted]

3. Size of business
   - Annual turnover: [redacted]
   - Number of employees: [redacted]
   - [redacted] Approximate annual production volume: [redacted]
4. Products manufactured with relevant tariff code classifications. The Appendix provides further details on each of these codes. Contract Manufacturing Steel Products
5. Exposure to import competition
   - Approximate percentage of revenue exposed to direct import competition: 100%
   - Key customer segments: Defence, Construction, Automotive, Engineering, Mining, Aerospace, Agriculture

2. Evidence of an Import Surge

This section addresses whether imports have increased in absolute or relative terms and whether they compete directly with your products.

1. Market observations
   - Have you observed increased import penetration in your product category? Yes
   - Over what period? 15 Years
2. Lost contracts or market share. Please provide examples where possible and attach supporting documents where available, such as tender summaries or internal reports.

   [redacted] Contract/project description: [redacted]
   - Approximate value: 3M
   - Date: 2017
   - Competing product origin (if known): Product sourced ex Hong Kong
   - Approximate price difference: Marginal
3. Pricing impacts
   - Have you experienced sustained price undercutting? Yes

- Estimated percentage price gap relative to imports: 10-30%
- Duration of price pressure: 15 Years

4. Other information:
   - Changes in order volumes
   - Shifts in customer procurement behaviour
   - Evidence of import-led price setting

3. Evidence of Injury

This section should indicate or demonstrate serious injury or threat of serious injury attributable to import pressure.

1. Financial impacts: Attach financial information where possible. Remember that this is a public submission.
   - Trends in revenue over the past 3–5 years: -20%
   - Trends in gross margins or EBITDA margins: 15% down to 4-5%
   - Evidence of margin compression attributable to import competition: ASIC Annual Financial report
2. Production and utilisation
   - Change in production volumes:
   - Capacity utilisation rate (current vs historical average): 65% vs 85%
3. Employment impacts
   - Number of employees reduced (if any): 30-40
   - Region/location of employment: Australia wide
   - Roles affected: Welders, Machine operators, sales
   - Hiring freezes or deferred recruitment: marginal
4. Investment impacts
   - Capital expenditure deferred or cancelled: Deferred Cap ex spends pending better margins and contract certainty
   - Estimated value of postponed investments: 4-5M

[redacted] Projects placed on hold: Business acquisition, Expanding to regional areas. [redacted]

[redacted] Explanation: Briefly explain why the injury identified above is linked to import surges rather than broader macroeconomic conditions.

Mining and Infrastructure projects are being sourced by contractors operating as Office fronts for overseas suppliers and fabricators sometimes at very little cost benefit to the principal contractor.

Direct correlation from COVID. Decline reflected in margin and sales decline from reshoring of products to offshoring after this period.

4. Productivity Implications
If a temporary safeguard measure were imposed, how would your business respond? Providing examples where available:

1. To what extent is your business currently constrained in its ability to make productivity improvements – for example capital investment and/or operational improvements?

   Invest in digital systems ie Factory 4.0 . Employ more apprentices

2. If a safeguard measure (a temporary measure to provide “breathing space” for industry) is imposed, what would your business consider doing/adjusting?

   Not much would change unless there was a commitment for long term change

5. Structural Implications
This section addresses broader economic consequences as the PC will assess whether the imposition of a safeguard measure, is in the public interest.

1. Skills and workforce
   - Are experienced or specialised employees being lost? Yes to mining companies inflating the labour market.
   - How difficult would it be to rebuild this capability? It has been lost
   - Estimated time to rehire and retrain equivalent staff: Many years. Education mind set needs to change the Rhetoric around the opportunity trades offer
2. Business viability
   - Has import pressure affected long-term viability of specific product lines?

     Yes on many products from Transport to agricultural and construction
   - Risk of exit from certain markets:
   - All market segments are at risk of being impacted.
3. Supply chain implications
   - Role of your firm in domestic supply chains:

     Electricity networks, agricultural and domestic construction are all potentially impacted especially when exposed to world events. IE COVID, War ….

- Consequences if domestic capacity contracts:

  Job losses and stagnant investment

4. Regional impact

   - Regional economic importance of your operations:

     Potential long-term loss of a local company supporting all industries resulting in loss of capability and jobs.