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Beenleigh Steel Fabrications

Submission to the Productivity Commission

Safeguard Investigation into Imported Fabricated Structural Steel

Submitted by:

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1. Executive Summary

Beenleigh Steel Fabrications (BSF) supports the imposition of safeguard measures on imported fabricated structural steel.

BSF has experienced direct and ongoing injury due to a surge in imported fabricated steel, particularly from China and Vietnam, at materially lower prices than domestically fabricated products.

This submission demonstrates that:

- There has been a significant increase in imports of fabricated structural steel into Australia
- Imported products are consistently undercutting domestic pricing by 25%–40%
- BSF has lost multiple major projects as a direct result
- These losses have caused material injury, including reduced capacity utilisation and workforce impacts
- There is a clear causal link between the surge in imports and the injury experienced

BSF submits that safeguard measures are necessary to restore fair competitive conditions and maintain Australia's sovereign fabrication capability.

2. About Us

Beenleigh Steel Fabrications is a Queensland-based tier-one steel fabrication and erection company servicing major commercial, industrial, and infrastructure projects across Australia.

BSF maintains significant investment in:

- Fabrication facilities and plant
- Skilled trades workforce and apprenticeships
- Project delivery capability for large-scale structural steel packages

BSF competes directly in the market segment most affected by imported fabricated structural steel.

3. Description of the Goods

The goods subject to this submission are:

- Fabricated structural steel components
- Including beams, columns, trusses, and assemblies
- Supplied as fully fabricated, project-ready steel packages

These goods are directly substitutable with those manufactured by BSF and other Australian fabricators.

4. Evidence of Import Surge

BSF's experience aligns with publicly available evidence demonstrating a surge in imports:

- The Australian Steel Institute reports fabricated steel imports have increased significantly in recent years, displacing domestic work
- Public reporting indicates imports have grown from approximately 425,000 tonnes to 700,000 tonnes within a three-year period, largely from China and Vietnam
- The initiation of this safeguard investigation itself reflects government recognition of a material increase in imports

This increase coincides directly with BSF's loss of major project opportunities.

5. Evidence of Price Undercutting

BSF has consistently encountered substantial price differentials between domestic and imported fabricated steel.

Project Evidence

Project	Value	Year	Origin	Price Differential
Woolworths Distribution Centre (Sydney)	\$100M	2024	Vietnam	~\$30M (~30%)
Cross River Rail	\$36M	2023–2026	China	Undisclosed (significant)
Neville Bonner Bridge	\$35m	2020	China	Undisclosed (significant)
Lake Macdonald Water Treatment	\$13M	2026	China	~\$5M (~38%)
Harvey Norman Helensvale	\$4M	2026	China	~\$1M (~25%)

These examples demonstrate a consistent pattern of imported fabricated steel undercutting domestic suppliers by 25%–40%.

This aligns with industry evidence from the Australian Steel Institute indicating imports are commonly priced 15%–50% below local fabrication costs.

6. Nature of the Injury

The loss of these projects has caused material injury to BSF, consistent with the criteria for safeguard measures.

6.1 Loss of Market Share

BSF has been displaced from multiple large-scale projects within its core market segment due to imported fabricated steel.

6.2 Reduced Capacity Utilisation

The diversion of work offshore has resulted in:

- Underutilisation of fabrication facilities
- Reduced throughput of workshop operations
- Inefficient recovery of fixed operating costs

6.3 Workforce Impacts

The reduction in secured project work has led to:

- Decreased available hours for skilled trades
- Constraints on hiring and retaining apprentices
- Increased employment uncertainty between projects

6.4 Margin Compression

Even where BSF remains competitive, imported pricing has forced:

- Unsustainable reductions in margins
- Increased commercial risk exposure
- Reduced ability to reinvest in the business

7. Causal Link Between Imports and Injury

There is a direct and demonstrable causal link between the surge in imports and the injury experienced by BSF:

- Projects lost by BSF have been awarded to suppliers using imported fabricated steel
- The decisive factor in these outcomes has been material price undercutting, not capability or capacity
- The scale of the price differentials exceeds what would be expected from normal competitive advantages

There are no alternative factors that adequately explain the consistent loss of work across multiple projects.

8. Broader Market Conditions

The injury experienced by BSF reflects broader industry conditions:

8.1 Global Overcapacity

The Australian Steel Institute has identified global steel overcapacity as a driver of excess exports into markets such as Australia.

8.2 Structural Market Distortion

Imported fabricated steel is often priced at levels inconsistent with:

- Raw material input costs
- Domestic labour and compliance costs

This suggests the presence of market distortions, including potential subsidisation or dumping.

8.3 Industry-Wide Impact

Public reporting indicates:

- Australian fabrication businesses are under significant pressure
- Some operators have exited the market due to inability to compete
- Local capability is at risk of long-term erosion

9. Threat of Further Injury

Absent safeguard measures, BSF expects injury to intensify:

- Continued loss of major project opportunities
- Further reduction in capacity utilisation
- Increased pressure on workforce stability
- Reduced ability to invest in plant, technology, and training

Over time, this may lead to permanent loss of domestic fabrication capability.

10. Conclusion and Request

BSF submits that:

- There has been a recent, sharp, and significant increase in imports of fabricated structural steel
- These imports are being supplied at materially lower prices than domestic products
- BSF has suffered serious injury as a direct result
- A clear causal link exists between imports and injury

Accordingly, BSF supports the implementation of safeguard measures, including tariffs or quotas, to:

- Restore fair competitive conditions
- Prevent further injury to domestic fabricators
- Maintain Australia's sovereign steel fabrication capability

Group General Manager