

Galintel Pty Ltd

Submission to the Productivity Commission

Safeguard inquiry into fabricated structural steel products

Prepared in relation to steel lintels prepared for use with doors and windows

1. Executive Summary

This submission concerns steel lintels prepared for use with doors and windows, being goods within the scope of the Productivity Commission's safeguard inquiry into certain fabricated structural steel products.

Galintel submits that increased imports of lintels have caused serious injury, and are threatening further serious injury, to the domestic industry.

Market data shows that over the period from 2021 to 2025, while detached housing activity declined by around 30%, lintel imports increased sharply, growing by more than 120%. Over the same period, locally manufactured lintels experienced a substantial decline in volumes, [REDACTED] This reflects increased import penetration in a contracting market, with corresponding displacement of domestic production.

The commercial effects have been material. Galintel has reduced direct employment and subcontracted activity across manufacturing, logistics, transport and warehousing, [REDACTED] [REDACTED]. Galintel has also deferred capital investment that would otherwise support additional employment and improved productivity in local manufacturing.

Galintel further submits that there is a clear inconsistency in the current treatment of the steel value chain. Galintel manufactures lintels locally using hot rolled coil procured from BlueScope. Following the Preliminary Affirmative Determination in Investigation 658 in relation to hot rolled coil, upstream hot rolled coil has become subject to trade remedies, while downstream finished lintels made from the same steel remain able to enter the Australian market and undercut local manufacturing. This materially weakens the competitive position of Australian downstream manufacturers.

For those reasons, safeguard action is warranted.

2. Key Business Information

- Company name: Galintel Pty Ltd ABN 27-000-159-866
- Location of operations:
 - Coffs Harbour NSW 2450, Manufacturing Plant
 - Brendale QLD 4500, Distribution Warehouse
 - Yagoona NSW 2199, Distribution Warehouse
 - Derrimut VIC 3026, Distribution Warehouse

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- Products manufactured with relevant tariff code classifications.
 - Steel Lintels / T Bars. HS Code 7308.90.00 64, 7308.30.00 00, 7301.20.00 00, 7228.70.00 12 and 7216.91.00 00

[REDACTED]

[REDACTED]

[REDACTED]

3. Product Concerned and Domestic Industry

The product concerned is steel lintels prepared for use with doors and windows. These goods compete directly with Australian-made lintels supplied into the residential construction market.

An example of the one of Galintel's T-Bar products and its application is shown below.



Galintel is an Australian manufacturer that has supplied the residential construction market for more than 40 years. Its manufacturing operations are based in Coffs Harbour and supported by distribution facilities in multiple states. Galintel manufactures lintels and T-Bars using Australian steel, including BlueScope hot rolled coil, and supplies customers nationally.

Galintel's evidence is that many imported lintels do not compete on a like-for-like basis with locally manufactured product. In particular, imported lintels often do not comply with AS 2699.3:2020 and AS 4680:2006, including in relation to product marking, traceability and galvanising durability.

For the purpose of any safeguard measure, the Commission should not confine its consideration to a single tariff classification if, in practice, lintels are commonly imported under more than one HS code. In Galintel’s experience, lintels are commonly imported under 7308.90.00 64, 7308.30.00 00, 7301.20.00 00, 7228.70.00 12 and 7216.91.00 00. Any safeguard measure should therefore capture the classifications widely used in practice for lintels and closely substitutable lintel products, so that the measure is not undermined by simple reclassification or product-description arbitrage.

4. Increased Imports and Serious Injury

The key market movements are set out below.

Indicator	2021	2024	Change
Detached housing construction	146,130	104,894	(28%)
Lintel imports (tonnes)	15,200	34,250	+125%
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Year	Harmonised Tariff Item Statistical Classification - Codes			Total	Evolution
	730120	721691	7308900		
2020	5,189	7,265	1,998	14,453	-
2021	4,752	6,633	3,815	15,200	5%
2022	2,436	13,837	3,730	20,002	32%
2023	3,586	20,418	5,704	29,708	49%
2024	3,560	25,858	4,833	34,250	15%
2025 forecast	5,749	28,808	3,511	38,068	11%

These movements are not consistent with imports merely following end-market demand. They indicate a substantial increase in import penetration during a period of weakening demand.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4. Causation

Galintel submits that the injury identified above is causally connected to increased imports and cannot be explained by broader market conditions alone.

The domestic housing market has been weak. HIA has reported that detached housing starts in Australia fell to decade lows in 2023/24 and were expected to decline further in 2024/25, with only a modest recovery expected from 2025/26. That market context is relevant, but it does not explain the observed divergence between imports and domestic production.

If housing market weakness were the primary cause of Galintel’s injury, imports and domestic production would be expected to contract broadly in line with the market. Instead, imports increased sharply while domestic production and sales declined materially. That divergence is consistent with import-driven displacement of domestic volume.

[REDACTED]

The broader international context is consistent with this. The OECD Steel Outlook 2025 states that Chinese steel exports reached a record 118 million tonnes in 2024 and that China’s subsidisation rate, as a share of firm revenues, is about ten times that of OECD countries. The OECD also points to government grants, below-market borrowing, subsidised energy prices and preferential tax treatment as continuing distortions.

5. Threat of Further Injury

The evidence also supports a finding of threat of further serious injury.

Galintel’s questionnaire response states that the primary users of imported lintels are residential builders focused on cost minimisation, and that these imports are increasingly supplied through large bulk steel importers. Because lintels are hidden once installed, non-compliant imported products are often not readily distinguishable at the point of use.

That market dynamic creates a foreseeable risk that, in the absence of relief, imports will continue to expand and displace compliant local production. If demand recovers, there is a substantial risk that the recovery will be captured disproportionately by imports rather than domestic manufacturers unless existing domestic capability is maintained.

[REDACTED]

6. Broader Economic and Social Impact

The impact of increased lintel imports extends beyond Galintel’s own operating performance. It also affects a broader Australian supply chain and has meaningful regional economic consequences.

Galintel manufactures lintels in Australia using Australian steel inputs, including hot rolled coil sourced locally, Australian zinc and nickel for galvanizing together with Australian labour, transport, warehousing, utilities and other supplier services. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7. Australian Interest

Safeguard action would be in the Australian interest.

The impact on end users is limited. Galintel estimates that lintels typically represent \$4,000 to \$6,000 in a residential build and, in most cases, account for less than 1% of total construction cost. The difference between a non-compliant imported lintel package and a compliant locally manufactured package is modest in the context of the cost of a full home, with the resulting “saving” representing less than 0.05% of total construction cost.

By contrast, the public interest in maintaining domestic capability is substantial. Galintel supports regional employment in Coffs Harbour and sustains a broader network of local trades, freight operators, warehousing activity and Australian steel demand. [REDACTED]

[REDACTED]

There is also a broader value-chain consideration. Galintel buys hot rolled coil locally to manufacture lintels in Australia. If trade remedies apply to upstream HRC but not to downstream lintels manufactured offshore from the same underlying steel, Australian manufacturers face a structurally uneven position. They remain exposed to undercutting in finished goods while relying on locally sourced upstream inputs. That weakens downstream manufacturing viability and undermines the intended effect of trade measures in the broader steel value chain.

8. Measure Sought

If the Commission recommends safeguard action, Galintel submits that the measure should be effective in practice and designed to prevent avoidance.

The measure should apply to steel lintels under tariff item 7308.90.00 64 and also capture any other tariff classifications commonly used in practice for lintels or closely substitutable lintel products, including 7308.30.00 00, 7301.20.00 00, 7228.70.00 12 and 7216.91.00 00.

It should be framed to prevent circumvention through tariff reclassification, minor product modification, incomplete assembly or misleading product descriptions.

Galintel further submits that the relief on finished lintels should be aligned, in practical effect, with the level of protection already applied upstream on hot rolled coil linked to PAD 658. The objective is not over-protection. It is to restore a fair competitive position across the steel value chain, rather than protect one segment of that chain while leaving downstream Australian manufacturers exposed.

9. Conclusion

The evidence indicates a significant increase in imports of lintels during a period in which the domestic market contracted [REDACTED]

The injury identified in this submission cannot be explained by housing market weakness alone. Imports increased sharply despite a weaker market, and the resulting displacement of domestic production is evident [REDACTED]

Galintel therefore submits that safeguard action is justified. Any measure should be framed broadly enough to be effective across the tariff classifications and import channels used in practice for lintels, robust against circumvention, and calibrated so that the relief applied to finished lintels is aligned, in practical effect, with the protection already applied to hot rolled coil in the upstream segment of the steel value chain.

Sources Referenced

- Housing Industry Association, 'New South Wales set to fall 120,000 homes short of target', 24 February 2025.
- Housing Industry Association, 'New home commencements in 2023 were the lowest since 2012', 12 April 2024.
- OECD Steel Outlook 2025 and OECD Steel Outlook 2025 full report, including discussion of Chinese steel exports and steel-sector subsidisation.
- Anti-Dumping Commission, EPR 658 — Hot rolled coil steel from China.