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About Roam Engineering

Roam Engineering is an Australian owned and operated business specialising in the design, manufacture, and construction of steel towers and poles for the power transmission, telecommunications, and mining sectors. We maintain a skilled workforce which includes engineers, welder/boilermakers (including apprentices), and other skilled tradespeople. Over our 31-year history we have supplied thousands of structures nationally. Our transmission track record includes over 20 years of supplying steel transmission structures to Western Power.

This submission is made in response to the Productivity Commission's call for submissions on its inquiry into whether safeguard action is warranted against imports of fabricated structural steel products. We have also submitted additional evidence to the Commission in support of this submission.

1. Business Overview

Our primary products fall within the following Harmonised Tariff Item Statistical Codes (HTISCs) currently under consideration by the Commission:

- 7308900052, hot-rolled columns, pillars, posts, beams and similar structural units. This covers our steel transmission and telecommunications poles, the core of our business.
- 7308900063, sectional components prepared for use in towers and lattice masts. This covers our lattice towers and guyed-mast structures.
- 7308900065, structures and parts of structures prepared for use in structures. This covers ancillary fabricated items such as antenna mounts, headframes, brackets, and foundation components.

Our key customer segments are power transmission, telecommunications, and mining.

2. Evidence of an Import Surge

We have observed a gradual erosion of our competitive position against imported structures for a number of years, which has noticeably worsened over the last three to four years.

On primary structure supply, imported product is typically materially cheaper than local product. This gap is not explained by productivity differences alone. It reflects lower offshore input costs (labour, steel, energy), lighter regulatory and compliance obligations, and the inconsistent application of equivalent Australian fabrication and materials standards to imported product.

On supply-only scopes, we lose almost every head-to-head contest against an imported option on price. We continue to win work, but mainly in segments where imports cannot effectively compete: turnkey projects that bundle construction scope, customers whose evaluation explicitly values local manufacture, engineering consultancy, and smaller-scale work for which importing is uneconomic. We have, in effect, been pushed out of the pure-supply market for our primary products.

We are also observing that stated local content preferences are not reliably translating into procurement outcomes. Local content requirements, where specified at tender, are being relaxed when import pricing is materially lower.

3. Evidence of Injury

The harm from the import surge does not always show up in headline financials. Many Australian fabricators have kept revenue steady by changing what they do, shifting into segments where imports cannot compete effectively, or by picking up one-off project work. The injury is visible instead in structural changes to the industry:

- Displacement of Australian fabricators from the pure-supply market for primary products, such that revenue is increasingly generated only in segments where imports do not effectively compete.
- Idle production capacity across the industry, well below the practical output that Australian facilities could sustain if the work were available.
- Suppressed hiring and apprenticeship investment, particularly in welding and boilermaking trades where capability takes years to develop. This is a leading-indicator form of injury with longer-term consequences for the national trades workforce.
- Deferred productivity investment across domestic fabricators. Capital and investment opportunities exist, but cannot be justified without improved confidence in the forward order pipeline.

A threat of further serious injury is also clearly present. Major public infrastructure procurement decisions continue to favour offshore supply on cost grounds, and there is no current indication this trend will reverse without intervention.

4. Productivity Implications

Productivity improvement in the Australian fabricated structural steel industry is currently constrained less by capital availability and more by pipeline uncertainty. Domestic fabricators have the capability to invest in automation, additional equipment, and capacity expansion, but cannot justify the return on such investment without confidence that sustained work will follow.

A significant portion of the cost gap between local and imported fabricated steel reflects scale. Overseas suppliers typically operate at volumes that Australian fabricators cannot match under current market conditions. Operating at greater scale would deliver genuine, lasting productivity gains: more output per unit of labour and energy, better purchasing power for raw materials, and the investment confidence to retain and train the niche engineering and trades skills on which efficient production of these structures depends. These are the productivity improvements that underpin long-term economic growth in the sector. A temporary safeguard measure, combined with a visible domestic order pipeline during the measure's term, would create the conditions under which Australian fabricators could make those efficiency and capacity investments, and sustain the productivity gains beyond the life of the measure.

5. Structural Implications

Sovereign capability for critical infrastructure

Telecommunications and power transmission infrastructure underpin almost every other critical service in Australia, including emergency services, payments, water, health, energy, and defence communications. The fabricated steel structures that carry that infrastructure, including poles, towers, and masts, are therefore sovereign-capability items.

The number of Australian fabricators with the specific design knowledge, quality systems, and trades capability to manufacture these structures to the relevant standards is small. The skills are niche and take years to develop in both engineering and trades personnel. Once this capability is lost, it is not quickly rebuilt. In an environment with increasing uncertainty around trade and supply chains, sustaining this capability domestically is a matter of strategic importance.

Regulatory and standards asymmetry

Australian fabricators operate under materially higher regulatory, safety, and quality obligations than most jurisdictions from which imports originate. In our work we routinely apply:

- AS/NZS 5131 for structural steelwork fabrication, including welder qualification, weld procedure qualification, inspection, and traceability obligations.
- Australian-grade steel, verified through Australasian Certification Authority for Reinforcing and Structural Steels (ACRS) certification.
- Australian Work Health and Safety obligations and the associated cost of maintaining a safe workplace under Australian law.

In our experience, these requirements are not applied equivalently to imported product. Imported structures are not consistently verified against AS/NZS 5131 fabrication standards, and ACRS-equivalent steel certification is not uniformly enforced. Part of the apparent cost advantage of imports therefore reflects regulatory asymmetry rather than genuine productivity difference. The longer-term quality and asset-life implications of this asymmetry are borne by Australian utilities, network operators, and end-users. We would encourage the Commission to take this into account when weighing the apparent consumer benefit of cheaper imports.

Supply chain

We play a role in a decentralised but capable Australian supply chain that includes Australian steel mills and distributors, local galvanizers, specialist coating suppliers, and logistics providers. Reduced domestic fabrication volumes reduce the viability of these adjacent businesses.

Conclusion

We support the Australian Steel Institute's application for a safeguard measure on imports of fabricated structural steel products. Our direct commercial experience aligns with the surge and injury pattern described in the ASI application.

A safeguard measure, combined with a visible domestic order pipeline during the measure's term, would allow domestic fabricators such as Roam Engineering to invest in productivity, scale output toward practical capacity, and sustain the trades pipeline on which longer-term sovereign capability depends.

Roam Engineering welcomes the opportunity to discuss any aspect of this submission in further detail.

General Manager, Roam Engineering