

Safeguard submission into import of fabricated structural steel made by CSF Industries

1. Business Overview

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

1. Company name: *CSF Industries Pty Ltd T/A CSF Steel Fabricators*
2. Location of operations: *Cairns and Townsville Queensland*
3. Size of business
 - Annual turnover: *FY24/25 – Approximately \$50M*
 - Number of employees: *130*
 - Approximate annual production volume: *Approximately 10,000t per annum*
4. Products manufactured with relevant tariff code classifications. *HTISC – 7308.90.00*
5. Exposure to import competition
 - Approximate percentage of revenue exposed to direct import competition: *90%*
 - Key customer segments: *Mining, Industrial, Commercial, Government and Defence projects*

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?

*The past 3-4 years has seen a significant increase of imported steel into the North Queensland market. Imported fabricated steel was initially prevalent in Southeast Queensland, however it has become increasingly common in North Queensland market. Refer to **Attachment # 1** for a summary of projects that we are aware of that have been imported. There are many more, specifically in the Mackay region, that we do not have details for. Also note that this does not include the significant amount of structural steel coming in for mining infrastructure projects located in Regional Queensland.*
 - Over what period? *3-4 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.

Refer to Attachment # 1 for details
3. Pricing impacts
 - Have you experienced sustained price undercutting?

*Yes, imported steel is a minimum of 30-50% cheaper than Australian fabricated steel. The majority of builders are focussed on price only to secure the project and proceed with the cheapest option. This results in the local fabricators competing harder for the remaining contracts with project margins typically between 0-5% to secure locally sourced contracts. There simply is not enough work to sustain the local fabrication industry with the increased volume of imported steel. Refer to **Attachment # 3** for a comparison of Australian made versus imported steel.*

- Estimated percentage price gap relative to imports:

30- 50%

- Duration of price pressure:

Last 3 – 4 years

4. Other information:

- Changes in order volumes:

CSF is a large fabricator and due to the decreased work in Mackay, Townsville and Cairns we have had to move into regions further afield to achieve the appropriate volume of work required to cover overheads and maintain profitability. The volume of structural steel that CSF supply into Mackay, Townsville and Cairns has decreased significantly, more than 50%.

- Shifts in customer procurement behaviour:

*Some customers are not sourcing pricing from local fabricators and sole sourcing directly from importers. Importers are now offering additional services such as engineering design scope as part of their submission. This results in the design works also being undertaken offshore and increasing the impact to the local supply chain. A specific example is the Fairfield Central Dan Murphy's and Tavern project in Townsville, this project was engineered, fabricated and painted in China prior to delivery to Townsville. Refer to **Attachment # 2** – Project Cover Sheet. Miscellaneous items that are required for the project are also being purchased or completed offshore. For example; fixing bolts, purlins, painting, hot dip galvanising, steel detailing, weld testing (if required), supply of consumables, gas etc. None of these items are procured through the local Australian supply chain.*

- Evidence of import-led price setting: Refer to **Attachment # 3** – Imported steel quotes compared to local supply. In this instance the project was only awarded to CSF based on our supply lead time and desire for the client to engage local suppliers post the Covid event, which is a very rare occurrence. The attached comparison was provided by our client and the imported option was 54.8% cheaper than the Australian supply.

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.

- Trends in revenue over the past 3–5 years:

To maintain profitability CSF has had to diversify away from only supplying fabricated structural steel. We have moved into roofing and cladding and also providing full design and construction services. These additional divisions assist with covering overheads and offsets some of the financial impact caused by imported fabricated steel. The pre-covid and current business revenue split is noted below:

	Revenue Split	
	Pre-covid	Current
Steel Fabrication	95%	70%
Roofing & Cladding	5%	8%
Design & Construct	0	22%

2. Production and utilisation

- Capacity utilisation rate (current vs historical average):

Historically every workshop experiences downturns, which generally lasts for short periods of time. Due to the influx in fabricated steel and in turn reduced demand locally, CSF experienced the longest period of underutilisation in the last 20 years of operation during FY2025/26. Historically our workshop operates above 80% utilisation, however for a 6month period from August 2025 to January 2026 we operated well below 80%, which simply isn't sustainable. Refer to graph and table below.

Billable vs Non-Billable Time



Month	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25	Jan-26
% Utilisation	80.6%	82.8%	81.6%	62.8%	69.4%	69.9%	66.5%	76.6%	79.6%

3. Employment impacts

- Number of employees reduced (if any):

There has been a steady decline in the number of boilermakers and welders employed in our workshop over the last 4 years. Refer to table below.

Year	Boilermakers & Welders
Jun-23	75
Jun-24	68
Jun-25	67
Mar-26	61

- Region/location of employment:

Cairns & Townsville

- Roles affected:

Boilermakers, welders, riggers and apprentice boilermakers

- Hiring freezes or deferred recruitment:

The magnitude of imported fabricated steel has resulted in a significant decrease in our ability to employ and train apprentice boilermakers. Refer to table below which indicates a significant decrease in the total number of apprentices employed by CSF.

Year	Total # Apprentices
Jun-23	20
Jun-24	19
Jun-25	12
Mar-26	11

4. Investment impacts

- Capital expenditure deferred or cancelled:

Refurbishment and expansion of our Townsville office and workshop has been deferred.

- Estimated value of postponed investments:

Approximate Value - \$750,000

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



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The volume of construction activity in North Queensland has remained steady over the last 3-4 years and the only significant change has been the number of projects lost to companies importing steel from Asia. This reduction in work has increased local competition and in turn significantly reduce project margins. The reduced profitability has resulted in placing non-essential capital expenditure projects on hold.

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?

The increase in imported fabricated steel has significantly impacted the volume of work which reduces capacity utilisation and our ability to cover the cost of overheads. This combined with the reduction in project margins impacts our ability to actively invest in productivity improving technology and processes. Currently we do not have long term confidence that the industry will have sufficient workload to support both locally made and imported steel.

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

Robotic fabrication, welding, handling and processing technology is developing quickly and over the last 5 years it has been made commercially viable to the steel fabrication sector. This technology is expensive and companies need to be able to forecast sufficient workload and profitability to justify this type of investment. If a safeguard measure was imposed, then this would provide fabrication companies with the confidence to invest in productivity improving technology that over time would make our industry competitive against cheap imported steel.

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. Companies are not training apprentices to the levels that are required to transfer the knowledge base to future generations. Skilled employees are retiring and the number of apprentices are simply not being employed to fill this gap. While this will directly impact the fabrication industry it will also have flow on implications for businesses that support both mining and construction industries.

- How difficult would it be to rebuild this capability?

Companies require continuity of work to employ and train apprentices. If imported steel continues to flow into the Australian market at the current levels, then businesses will not have consistent workload and steel fabrication companies will in turn train less. The construction skills shortage will worsen over time. Once the skill base is lost then it will be very difficult to train back up to the levels that Australia requires to maintain sovereign capability moving forward.

- Estimated time to rehire and retrain equivalent staff:

It takes 8 to 10 years to replace a skilled fabricator. 4 years for the apprenticeship and 4-6 years' experience within the workforce.

2. Business viability

- Has import pressure affected long-term viability of specific product lines?

Yes. Standard fabricated steel that is used in everyday construction will not be viable to be fabricated locally.

- Risk of exit from certain markets:

Steel fabrication for medium and large construction projects are at risk. Steel fabricators will not have the size, capacity and skill set to undertake these projects successfully.

3. Supply chain implications

- Role of your firm in domestic supply chains:

CSF currently purchases all products required to undertake our work from local suppliers. Items such as steel beams, channels, tube, plates, welding gas and consumables, fixing bolts, purlins, hot dip galvanising, blast and painting, steel detailing to name a few. The local economic multiplier associated with our industry is significant.

- Consequences if domestic capacity contracts:

There will be a significant impact to the construction and infrastructure industry. Capacity to undertake medium and large-scale construction and infrastructure projects will be lost, which will then be sourced from offshore. This will increase supply lead time, project risk, potential delays, quality issues, remove the ability for local companies to fix or maintain installed products. The impact on supporting services and suppliers will also be significant.

4. Regional impact

- Regional economic importance of your operations:

CSF employs approximately 130 fulltime staff in North Queensland and generates annual revenue between \$50-\$60million. If the industry is no longer viable then the impact to local employment and suppliers in North Queensland will be significant. There will also be impacts to not for profit and sporting organisations that receive support from locally owned and operated businesses such as CSF.

Attachment # 1 - NQ Imported Projects

Projects	Approx. Tonne	Approx. Australian Project Price	Location	Year	Source
	400	\$ 5,010,000.00	Townsville	2024	Asia
	200	\$ 2,505,000.00	Townsville	2023	Asia
	300	\$ 3,757,500.00	Townsville	2024	Asia
	100	\$ 1,252,500.00	Townsville	2025	Asia
	200	\$ 2,505,000.00	Townsville	2025	Asia
	100	\$ 1,252,500.00	Townsville	2024	Asia
	150	\$ 1,878,750.00	Townsville	2024	Asia
	100	\$ 1,252,500.00	Townsville	2025	Asia
	110	\$ 1,377,750.00	Townsville	2025	Asia
	100	\$ 1,252,500.00	Townsville	2025	Asia
	50	\$ 626,250.00	Townsville	2025	Asia
	30	\$ 375,750.00	Townsville	2025	Asia
	102	\$ 1,277,550.00	Townsville	2023	Asia
	140	\$ 1,753,500.00	Cairns	2022	Asia
	165	\$ 2,066,625.00	Cairns	2026	Asia
	30	\$ 375,750.00	Cairns	2025	Asia
	60	\$ 751,500.00	Cairns	2025	Asia
	625	\$ 7,828,125.00	Mackay	2023	Asia
	1550	\$ 19,413,750.00	Mackay	2024	Asia
	132	\$ 1,653,300.00	Mackay	2023	Asia
	134	\$ 1,678,350.00	Mackay	2023	Asia
Totals	4778	\$ 59,844,450.00			

Notes:

* Projects noted are what we CSF aware of only, there are numerous projects supplied that we have no knowledge of

* Asia - Either China or Vietnam

Attachment # 2 - Fabricated & Engineered Offshore

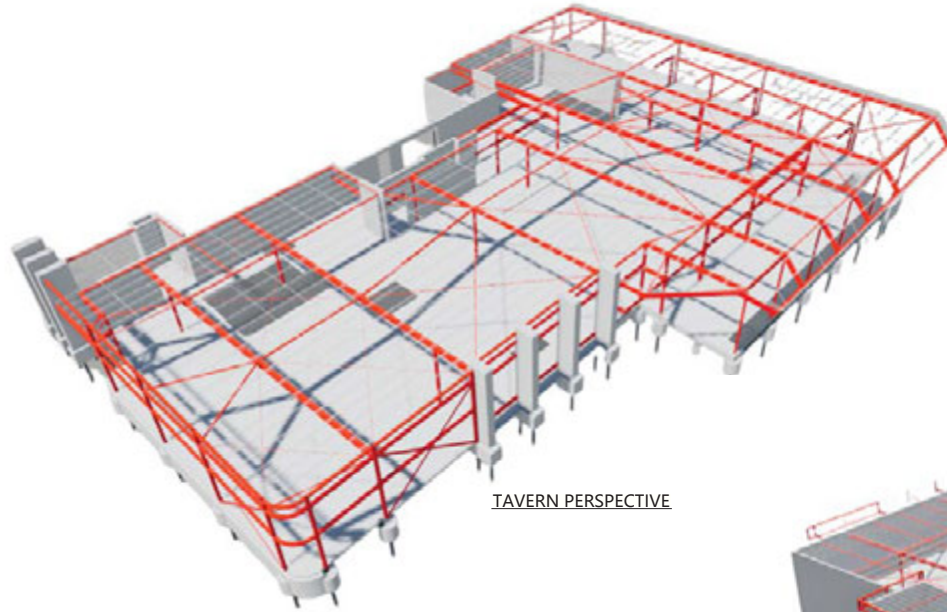
PROJECT: **PROPOSED FAIRFIELD CENTRAL**

AND TAVERN

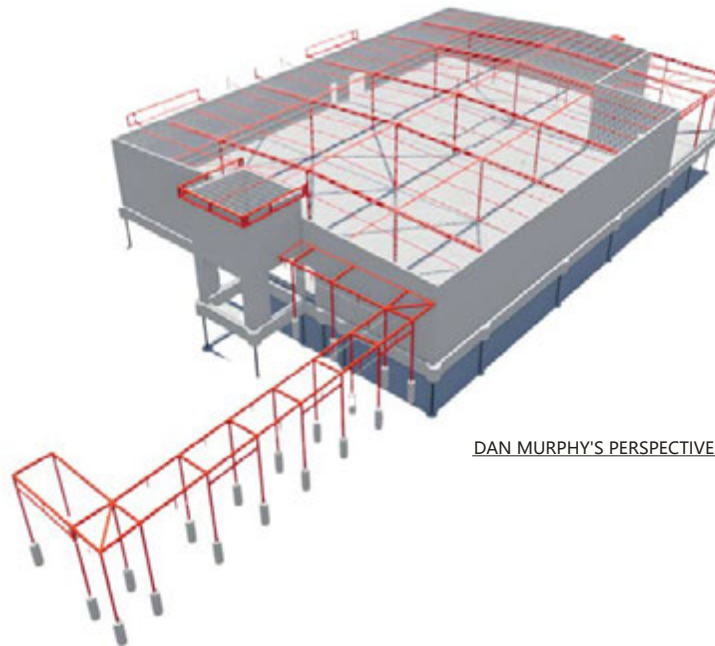
CLIENT:

ADDRESS:

,IDALIA QLD 4811



TAVERN PERSPECTIVE



DAN MURPHY'S PERSPECTIVE

DRAWING LIST		
SHEET No.	SHEET NAME	REV.
S000	COVER SHEET & DRAWING INDEX	1
S001	GENERAL NOTES SHEET 1	1
S002	GENERAL NOTES SHEET 2	1
S003	GENERAL NOTES SHEET 3	1
S200		1
S201	SLAB ON GENERAL ARRANGEMENT PLAN	1
S210	TAVERN FOOTING LAYOUT	1
S211	TAVERN SLAB ON GROUND GENERAL ARRANGEMENT PLAN	1
S220	TYPICAL SLAB AND FOOTING DETAILS SHEET 1	1
S221	TYPICAL SLAB AND FOOTING DETAILS SHEET 2	1
S222	TYPICAL SLAB AND FOOTING DETAILS SHEET 3	1
S223	TYPICAL SLAB AND FOOTING DETAILS SHEET 4	1
S224	TYPICAL SLAB AND FOOTING DETAILS SHEET 5	1
S225	TYPICAL SLAB AND FOOTING DETAILS SHEET 6	1
S226	TYPICAL SLAB AND FOOTING DETAILS SHEET 7	1
S400	CONCRETE PANEL GENERAL ARRANGEMENT PLAN	1
S401	TILT PANEL PERSPECTIVE AND WEIGHTS	1
S402	CONCRETE PANEL OUTLINES SHEET 1	1
S403	CONCRETE PANEL OUTLINES SHEET 2	1
S410	CONCRETE PANEL REINFORCEMENT SHEET ELEVATION SHEET 1	1
S411	CONCRETE PANEL REINFORCEMENT SHEET ELEVATION SHEET 2	1
S450	PRECAST PANEL DETAILS SHEET 1	1
S451	PRECAST PANEL DETAILS SHEET 2	1
S500	ROOF FRAMING PLAN	1
S501	ROOF PURLIN PLAN	1
S502	TAVERN ROOF FRAMING PLAN	1
S503	TAVERN ROOF PURLIN PLAN	1
S510	ELEVATIONS & SECTIONS SHEET 1	1
S511	ELEVATIONS & SECTIONS SHEET 2	1
S512	ELEVATIONS & SECTIONS SHEET 3	1
S520	TAVERN ELEVATIONS & SECTIONS SHEET 1	1
S521	TAVERN ELEVATIONS & SECTIONS SHEET 2	1
S522	TAVERN ELEVATIONS & SECTIONS SHEET 3	1
S523	TAVERN ELEVATIONS & SECTIONS SHEET 4	1
S524	TAVERN ELEVATIONS & SECTIONS SHEET 5	1
S530	TYPICAL STEEL DETAILS SHEET 1	1
S531	TYPICAL STEEL DETAILS SHEET 2	1
S532	TYPICAL STEEL DETAILS SHEET 3	1
S533	TYPICAL STEEL DETAILS SHEET 4	1
S534	TYPICAL STEEL DETAILS SHEET 5	1
S535	TYPICAL STEEL DETAILS SHEET 6	1
S536	TYPICAL STEEL DETAILS SHEET 7	1
S540	COMPOSITE DETAILS SHEET	1
S550	MASONRY WALL DETAILS	1
S600	WALKWAY STEEL PLAN/ELEVATIONS	1

TOTAL:45

REV.	DESCRIPTION	DATE	DRWN	APP
T	100% IFC ISSUE	2025/09/29	AL	KX
D	100% IFC ISSUE	2025/09/19	AL	KX
C	90% IFC ISSUE	2025/08/28	AL	KX
B	80% DD ISSUE	2025/04/18	AL	KX
A	COORDINATION ISSUE	2025/03/31	AL	KX

CLIENT:

SCALE:
AS NOTED - A1 ORIGINAL SIZE



PROJECT:
PROPOSED FAIRFIELD CENTRAL TAVERN AND
QLD 4811

DRAWING TITLE:
COVER SHEET & DRAWING INDEX

JOB No. **6062**

FOR CONSTRUCTION

DRAWING No. **S000** REVISION **1**

Attachment # 3 - Australia v Imported Comparison 2025

Imported Cost Summary

Workshop	Qty	Rate	Unit	Amount
Light Structural Steel <30 kg/m	75	\$ 3,540	t	\$ 267,125
Medium Structural Steel >=30,<60 kg/m	78	\$ 2,800	t	\$ 219,355
Heavy Structural Steel >=60,<120 kg/m	52	\$ 2,590	t	\$ 134,996
Extra Heavy Structural Steel >=120 kg/m	137	\$ 2,510	t	\$ 343,795
Grating, Floor, Gal F325 Plain 32x5mm Load Bars, Bolted & Clipped	20	\$ 215	m2	\$ 4,300
F405 Stair Tread Grating Gal Serrated 40x5mm Load Bars, Bolted Connection c/w Yellow T6 Nosing, 900mm x 240mm	50	\$ 86	ea	\$ 4,300
Monowill - Handrailing Monowills type c/w knee rail and kickplate	1	\$ 7,950	t	\$ 4,452
Monowill - Handrailing Monowills type c/w knee rail No kickplate	0	\$ 7,950	t	\$ 2,385
Gutter Brackets	EXCLUDED			
Delivery	27	\$ 8,350	containers	\$ 225,450
Bolts	1	\$ 19,570	sum	\$ 19,570
Subtotal				\$ 1,225,727

Warehouse	Qty	Rate	Unit	Amount
Light Structural Steel <30 kg/m	15	\$ 3,540	t	\$ 54,261
Medium Structural Steel >=30,<60 kg/m	17	\$ 2,800	t	\$ 48,630
Heavy Structural Steel >=60,<120 kg/m	20	\$ 2,590	t	\$ 52,041
Extra Heavy Structural Steel >=120 kg/m	5	\$ 2,510	t	\$ 12,668
Grating, Floor, Gal F325 Plain 32x5mm Load Bars, Bolted & Clipped	22	\$ 215	m2	\$ 4,623
F405 Stair Tread Grating Gal Serrated 40x5mm Load Bars, Bolted Connection c/w Yellow T6 Nosing, 900mm x 240mm	128	\$ 86	ea.	\$ 11,008
Monowill - Handrailing Monowills type c/w knee rail and kickplate	1	\$ 7,950	t	\$ 11,130
Gutter Brackets				\$ -
Delivery	5	\$ 8,350	containers	\$ 41,750
Bolts	1	\$ 4,890	sum	\$ 4,890
Subtotal				\$ 241,001

Client Costs	Qty	Rate	Unit	Amount
Supervision & QA in China Unloading at Brisbane Port Delivery to site	1	\$ 500,000	ea	\$ 500,000
Subtotal				\$ 500,000

Imported Total Cost	\$ 1,966,728
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Australian Total Cost	\$ 3,585,893
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Value Difference	\$ 1,966,728
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% Difference	54.8%
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Date: 14/01/25

OP001204 rev 1

Client:

Attention:

RE: WORKSHOP & WAREHOUSE

We offer for your consideration our revised quotation for the supply, fabrication and delivery of structural steel and purlins for the above project in accordance with the tender documents received and CSF scope of works nominated below.

Tender Documents –

- Annexure 1 - Tender Drawings
- Annexure 2 - Tender Documents
- Annexure 3 - Company Specifications
- BOM
- EOI Returnable Documents
- Returnable Schedules

Crane beam drawings

Crane beam access walkways

Addendums

- One

Inclusions

- Coordination of areas of interface with the Contractor and Subcontractors.
- Supply of fabricated structural steel as detailed on the structural workshop drawings only (unless noted below in inclusions).
- Supply of stair tower steelwork, mezzanine stairs, handrails (topcoat painted yellow), grating (hot dip galvanised) & stair treads (hot dip galvanised).
- A65 crane rails & Gantrex fixing clips (including fitting/welding of clips to runway beams)
- Surface treatment of structural steelwork to system specified in addendum 1 (blast class 2.5, one coat of epoxy zinc primer 75 microns, 2nd coat high build polyamide epoxy 150 microns).
- Supply of steel-to-steel fixings/bolts.
- Delivery to site FOT.

- CC2 traceability in relation to materials & fabrication. (CSF are accredited to Level CC3)
- Supply of 305-off gutter brackets as set out in schedule 4 scope.

Exclusions

- Workshop drawings.
- Supply of all purlins, girts and bridging.
- Hold down/rag bolts.
- Light poles.
- 40 x 1.15BMT trimming angles.
- S/S earth lugs.
- Unloading on site.
- Touch up of damage to protective coatings caused during transportation, all care taken but some minor damage may occur.
- Erection of steelwork, purlins, handrails, grating or stair treads.
- Removal of embossed manufacturer identification labels on structural steel.
- All stud framing, battens and bulkhead framing.
- Roof and wall cladding, gutters, downpipes, pit and drain covers.
- All metal work including cast-in pit angles etc.
- Cladding supports & wall junction angles/corner guards.
- Downpipe brackets, bird netting and vermin mesh screens.
- Weed and seed

Notes

1. CSF Steel Fabricators will require certain digital files to be provided along with the workshop drawings. I have attached a list with this quote.
2. All fabrication and installation in accordance with AS/NZS 5131:2016
3. Unless noted otherwise above, all plates will be supplied from grade 250 plate and SHS/RHS supplied as standard grade 350.
4. In case of supply only items, it is the responsibility of the Client to ensure materials are installed in accordance with the Consultants drawings, notes and specifications. CSF Steel will not accept any liability for the incorrect installation of supplied materials.
5. CSF price based on a complete and coordinated set of issued for construction workshop drawings being issued prior to commencement of fabrication. (Workshop drawings received by CSF Steel Fabricators to be of a standard suitable to issue to the workshop. Clear and concise material lists will also be required).
6. Liquidated damages (if applicable) are to be negotiated.
7. Pricing is subject to confirmation at the time of award.

Total Quotation \$3,585,893-00 Excludes GST



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Please don't hesitate to contact myself for any further clarification.

Workshops in Cairns & Townsville

E:

[CSF Industries LinkedIn](#)



EXTRACT FROM CHINESE QUOTATION

Item	Description	Quantity	Unit	Unit Rate AUD	Amount AUD
Option I - AS Standard Steel					
1	Structural Steel	377.47	tonne	3,660.00	1,381,547.52
2	Purlins	68.74	tonne	2,630.00	180,773.05
3	Packing and Ship CIF Brisbane Port, 40'GP	29.00	nos	7,930.00	229,970.00
	Total: AUD				1,792,290.57
Option II - EN Standard Steel					
1	Structural Steel	377.47	tonne	2,890.00	1,090,894.08
2	Purlins	68.74	tonne	2,630.00	180,773.05
3	Packing and Ship CIF Brisbane Port, 40'GP	29.00	nos	7,930.00	229,970.00
	Total: AUD				1,501,637.13

Notes:
 1 The price including shop drawings, supply of steel material, workshop fabrication, packing and loading into container for export work, export Custom clearance, shipping to Brisbane Port with 40'GP, but excluding local port charges and local transportation.

- 2 Option I - All steel material shall be Australian Standard grade 250, 300 and 350, as specified, Purlin is to be G450/2350. Option II - All steel material is to be grade EN10219 S275J0/S355J0 (CHS/S/HS/RHS) and EN10025 S355J0 (UBUC/PFC/Angle/plate) that equivalent to Australian Standard grade 250, 300 and 350, EN Standard section sizes are similar to AS as specified, Purlin is to be G450/2350
- 3 Fabrication shall comply with AS/NZS5131, welding shall comply with AS/NZS1554, 1 SP
- 4 Fabricated steelwork shall be hot dip galvanized to AS4680.
- 5 The price including millcert and QA/QC report
- 6 The price excluding holding down bolts, connection bolts, gutter and cladding.
- 7 Fabricated steelwork shall be inspected and accepted on workshop before delivery
- 8 30% deposit upon contract duly signed, 65% upon Exw CG workshop and 5% retention in 3 months after Exw Loading.
- 9 Payment Duration is 30 days against invoice
- 10 Total amount subject to final measurement upon theoretical weight from final approved shop drawing.
- 11 The payment shall be fixed in AUD, excluding duties and taxes imported to AUS and GST
- 12 Validity of this quotation within 30 days

01/08/2024

OCG/2024/078A

