

Fabricated structural steel safeguards: Productivity Commission inquiry

Submission of The Australian Workers' Union

May 2026

Introduction

The Australian Workers' Union (AWU) is one of Australia's largest and most diverse unions. We represent over 79,000 members, including around 6,000 workers in the steel industry. We are the principal union at the nation's primary and secondary steelmakers, as well as in the steel fabrication industry. Much of the AWU's wider membership also works in other beneficiary industries both upstream and downstream of structural steel fabrication: We have tens of thousands of members across the civil construction, resources and manufacturing sectors.

The AWU therefore understands well the importance of structural steel fabrication – for our own members in the industry, but also as a source of nearly 20,000 direct jobs throughout Australia,¹ and for thousands more indirectly supported workers. We also recognise that the industry delivers a basic but fundamental sovereign capability. Absent structural steel fabrication, a country's civil and building construction, defence industries and resources supply chains are utterly incomplete. Structural steel fabrication is also a key enabler of Australia's crude steel production capabilities, as the end-user of approximately one quarter of all locally made steel.²

Given the importance of structural steel fabrication to both AWU members and working Australians more broadly, the union is deeply concerned by what the OECD has labelled the '*pervasive use of non-market practices by some countries that are distorting steel prices, reducing other countries' market shares, creating severe trade disruptions, and leading to national and economic security risks....Steel workers and businesses in market-oriented economies are being displaced.*'³ While the causes and characteristics of these damaging practices are complex, expert organisations are united in diagnosing their ultimate cause as continuing overcapacity in China's behemoth steelmaking sector.⁴

Equally clear as the root cause are the consequences for Australian workers in structural steel fabrication: Lower wages, fewer jobs and less work at the ever-more strained facilities that remain. There is also every indication the problem is only growing more severe. The AWU has become increasingly frustrated as other governments take strenuous action to protect local workers and industry from this flood of excess, underpriced steel, while Australia exercises what might be labelled a reckless degree of restraint.

We thus welcome the Australian Steel Institute's (ASI) application for the Commonwealth to act, if belatedly, by applying safeguard measures on fabricated structural steel imports to Australia. In turn, we commend Treasurer Chalmers for referring the application to the Productivity Commission (PC) for investigation.

With an eye to the abundant evidence of a flood of fabricated structural steel imports to our country, and the sharply adverse impacts of those imports on local workers and industry, we submit that the case for safeguards is both clear and urgent. The below explores the AWU's position in detail.

China's steel export flood

It is an axiom of the global steel industry that China stands apart – producing, as it does, 52% of all steel made globally.⁵ Chinese steelmaking has long focused on servicing the country's own voracious demand. But its unmatched scale also affords it the status of the world's largest exporter of most steel products. In 2020, China was the source of 14% of all steel exported worldwide.⁶ Australia, by comparison, ranks as a decidedly minor player. It produces just 0.3% of global steel,⁷ largely for local consumption – though even its own domestic market is import-reliant to some extent.⁸

In recent years, domestic economic pressure has posed a grave challenge to China's uniquely large steel industry, ultimately upending steel market dynamics for China and thus the wider world. Severe issues in China's infrastructure and property sectors, which underpin local steel demand, have forced its steelmakers into "*structural decline*"⁹ since 2021. However, Chinese steel producers have not responded to much softer local demand with an equivalent reduction in production volumes. Instead, they have increased exports dramatically, with highly disruptive effects for all import markets, including Australia. China's total steel exports rose by 120% from 2020 to 2024, its share of all global steel exports climbing to 28%.¹⁰

In addition to handling a flood of Chinese steel imports, exposed markets have reported increases in steel supplied by other jurisdictions. These trends are most often connected. For instance, with China having exported a notable portion of its excess capacity to ASEAN markets, exports from producers in that region also rose

by 35% from 2020 to 2024.¹¹ Australian steel fabricators have reported a significant increase in import competition from Vietnam over recent years.¹²

How has Chinese steel found such ready export markets in the face of economic upheaval at home? It is essentially a matter of lower prices. In the case of fabricated structural steel supplied to Australia, Chinese producers sell at prices 15% to 50% lower than their cheapest domestic competitors, according to the ASI.¹³ However, this is by no means a case of even-handed competition atop a level playing field. Far from it: China subsidises its steel industry at around ten times the average rate of the 38 OECD member-states (including Australia).¹⁴ These subsidies – provided en masse and in the ordinary course of business – have been called out in the wake of the export spike for their '*severely distortive effect*' on global markets.¹⁵

Australia, with its open trade posture and comparatively small steel production capacity, has been an obvious and an easy target for the excess steel flood originating in China. For the OECD's statistical region of Oceania, in which Australia is by far the largest market, steel imports rose a full 77% from 2020 to 2024.¹⁶

As the ASI has demonstrated, the overcapacity and subsidisation issue has also driven much increased imports of fabricated structural steel specifically. We understand the institute's trade data analysis, supplied to the PC, demonstrates that imports of fabricated structural steel rose by a volume equivalent to a significant portion of all domestically made product in just two years to 2024. Crucially, local production also declined by a very similar amount over that period. This demonstrates that the impact of high-volume, unfair and distortive trade has been to displace local producers, rather than expand Australia's domestic steel market.

Key markets shielded, Australia stays open

The exposure of Australia's steelworkers and industry to the import flood is exacerbated by ongoing inaction in the trade remedies space. Key jurisdictions, including many major economies and committed trading nations, have responded to steel market upheaval with trade remedies (mostly established, WTO-sanctioned measures). The use of anti-dumping, safeguards and other measures has risen sharply in conjunction with the overcapacity and subsidy issue.

According to the OECD, in 2024, governments launched 81 anti-dumping investigations concerning steel products, with nearly 80% of those matters focused

on Asia-based exporters. Just one year earlier, that figure stood at 16 investigations.¹⁷ That rise, while obviously steep, does not account for safeguards and countervailing investigations also launched in 2024, nor other major actions taken recently by some of the world's largest economies. As regards those further actions, we note especially:

- **European Union:** Last year, the EU announced that longstanding steel safeguards measures will be extended and strengthened. From June, Europe will impose a 50% import duty on all steel imports above a prescribed annual quota.¹⁸
- **United Kingdom:** The UK recently announced that it, too, will strengthen existing steel safeguards from July. Whitehall will effectively mirror Brussels - imposing a 50% tariff on imports of a wide range of steel products where a reduced yearly quota is exceeded.¹⁹
- **United States:** The most recent in a whirlwind of US tariffs imposes a 50% duty on steel imports. Rather than established safeguards or other WTO-recognised measures, the White House has relied on national security powers set out in US trade legislation.²⁰
- **Other jurisdictions:** Other important, outward-facing economies have also extended or expanded steel safeguards and other remedies. Among numerous examples,²¹ Brazil recently extended existing steel safeguards. As with EU and UK measures, these apply a large tariff to imports above a prescribed quota.²²

Unfortunately, while many key steel markets have erected shields to defend local workers and industry from the storm, Australia has failed to take action of comparable gravity. As the G20's *Global Forum on Steel Excess Capacity* (GFSEC) has recognised, markets that elect to remain exposed face heightened risks to their steel industries.²³ Indeed, IBISWorld has called out Australia as receiving higher volumes of Chinese fabricated structural steel in the wake of US tariffs.²⁴

Less protected markets such as Australia are also more vulnerable to measures taken by exporters to circumvent trade remedies. Of particular note for the steel industry is an increase in trade of semi-finished and other simple products, which are generally less exposed to trade remedies.²⁵ The OECD has also identified an increase in

“*suspicious trade*” of steel, suggestive of transshipment for the purpose of evading remedies that fall short of universally applied safeguards.²⁶

No respite in sight

Leading multilateral organisations expect little reprieve from the China-led steel flood in the near future, despite continued decline among major Chinese buyers and flat demand across the developed world.²⁷ The OECD forecasts “*substantial increases*” in global steelmaking capacity to 2027, and potentially a new capacity record in 2028. This trend continues to be led by China, despite government rules that formally restrain new capacity,²⁸ with new Indian as well as China-sponsored international projects also significant.²⁹

The GFSEC, focusing on domestic conditions in China, projects ongoing contraction in local demand this year - albeit at a lower rate than that observed since structural decline in 2021. The forum expects that, while steel demand for local infrastructure may edge up, China’s shellshocked housing market is yet to bottom out.³⁰

These credible projections strongly suggest that the economic conditions, investments and trade patterns that have fuelled the steel import flood represent a prospective as well as a present risk to Australian steel workers and businesses, including in fabricated structural steelmaking. The relevant damage and risks must therefore be assessed on that basis.

Impacts on local workers, industry

The corollary of the conditions and patterns described above is serious and indeed comprehensive injury to workers and businesses in Australia’s fabricated structural steel industry. These injuries include serious and still-worsening impacts on workers’ wages, jobs and domestic capability itself. This disruption has also had severe implications for investment, including that required to facilitate the industry’s energy transition, and on dependent industries.

Wages and employment

IBISWorld directly attributes rising imports of fabricated structural steel to a decline in both wages and total employment for local workers.³¹ Indeed, from 2020-21 to present, the average structural steel fabricator’s wage has fallen by nearly 15%.³²

Plainly, this amounts to a serious setback – in its own right, but even more so in light of wider workforce trends and macroeconomic conditions. From November 2020 to November 2025,³³ the average full-time wage in Australia's manufacturing sector increased by almost 18%. This rise was essentially mirrored in the broader full-time workforce,³⁴ with average earnings for all workers rising even further at around 20%.³⁵ As might be expected in light of such sharply contrasting figures, structural steelworkers now take home less pay on average than other manufacturing workers.³⁶

That fabricated structural steelworkers should have seen their wages fall so significantly in recent years is exacerbated further by severe inflation over the same period. Since 2020, the consumer price index has typically measured well above the Reserve Bank's target band.³⁷ But while many workers have struggled to ensure their wages kept pace with inflation, steel fabricators have actually seen their take home pay go backwards, even as their expenses skyrocketed.

Another key metric for the industry's workforce, heading in the wrong direction, is total employment. The fabricated structural steel workforce declined in size by 2.2% from 2021 to 2025, with IBISWorld expecting further contraction to 2030.³⁸ To an extent, the shrinking industry can be attributed to the outright closure of some operations; The ASI reports that 18 structural steel fabrication businesses closed in Western Sydney alone from mid-2024 to December 2025.³⁹ But more pernicious in this regard appears to be downsizing. The average number of workers in each structural steel fabrication business fell by 3.1% from 2021 to 2025, and a sizeable minority of firms now employ no workers at all.⁴⁰

Business conditions

Much poorer conditions for local workers since the China-led steel flood are suggestive of a very challenging outlook for the industry as a whole. Indeed, imports have been eating into local fabricators' order books for some time. Firms are securing less work and operating well below capacity. We note that data supplied to the PC by the ASI suggests a near-45% fall in production volumes, and a more than 55% drop in capacity utilisation, in the industry from 2021-22 to 2024-25.⁴¹

Of equal concern, if unsurprising given the above, is the industry's declining profitability. Where domestic firms are still able to secure work, the unfair subsidies provided to international producers force them to accept much lower prices. The

profitability of local structural steel fabrication has effectively tanked since the structural shift of 2021 – falling 17.4% from 2021 to 2025.⁴²

Australian fabrication firms require capacity utilisation of at least 80% to be sustainable in the long-term.⁴³ Moreover, we strongly submit that, in such a diverse and competitive industry, most operators cannot continue to sustain anything close to the severe erosion of their profit margins recorded since 2021. These figures are thus strongly suggestive not just of highly adverse conditions, but of the likelihood of further damage without action.

Investment and transformation

Steel fabrication is not only a highly competitive enterprise, but an inherently capital-intensive undertaking. As well as needing to keep pace with process efficiencies and other improvements, local operators will need to invest in capital that delivers emissions abatement in accordance with Australia's decarbonisation commitments.

All such commitments require both finance and confidence in the viability of a return. Amid the destruction and degradation being wrought on the industry, neither prerequisite is available to most operators. Such underinvestment reflects a wider pattern in the global steel industry, suffering as it is from "*reduced investment in innovation and next-generation production technologies*".⁴⁴ Indeed, the OECD explicitly attributes a widespread trend of decarbonisation investments being put on the backburner to excess capacity and trade disruption.⁴⁵

Related industries

Our analysis of the serious injuries sustained by workers and fabricators from the flood of excess, underpriced steel is limited to the industry itself. Nonetheless, it should be emphasised that further, serious damage will necessarily bleed through to the many other industries that rely on local fabrication as either a customer or a supplier. Some such impacts have clear and potentially serious implications for Australia's economic and national security.

Most obviously, it is inconceivable that either BlueScope or InfraBuild could readily sustain such a large hit to demand as permanent and widespread degradation of domestic fabrication capacity would entail. We further submit that it is vital that Australia's civil construction and defence manufacturing industries retain the ability

to secure fabricated steel inputs domestically, as the nation's strategic circumstances may require. More generally, should erasure or permanent degradation of Australia's structural steel fabrication occur, it should be expected that import prices would rise in line with reduced competition. This, clearly, would place further pressure on the construction and manufacturing sectors in general.

The case for action

In the AWU's submission, the flood of excess, underpriced steel should not end in the loss of yet-more Australian jobs, poorer wages for those that remain, or the undermining of important domestic capabilities. The case for action, and specifically for safeguard measures, is plain.

While there is no domestic legislation spelling out the circumstances that warrant the imposition of safeguard measures, this assessment is generally carried out in accordance with requirements derived from relevant WTO agreements.⁴⁶ In essence, it must be determined, "*whether the product under reference is being imported into Australia in such increased quantities, absolute or relative to domestic production, and under such conditions as to cause or threaten to cause serious injury to the domestic industry that produces like or directly competitive products.*"⁴⁷ While it is not the AWU's intent to provide exhaustive legalistic analysis, we note that key terms in this test are generally interpreted in accordance with plain English.⁴⁸

In our firm submission, the above-cited evidence makes it plain that fabricated structural steel has been imported into Australia in vastly increased quantities since 2021, both in absolute terms and relative to that produced domestically. The root causes of this surge are similarly clear and extensively documented. The imports flood has had a direct and severe impact on domestic industry, inclusive but certainly not limited to the wages and job prospects of its workers. There is every indication it will continue to do so, with ongoing and very likely worsening impacts.

The case for safeguard measures is thus made out - and the Commonwealth should respond accordingly.

As well as meeting the requisite test, safeguard measures would correspond with established, WTO-sanctioned steps taken by many other governments - including leading steel markets, open economies and close Australian partners. Likewise, it would meet the call from multilateral organisations and industry experts for

enhanced government action to mitigate and manage the impacts of the China-led steel flood.⁴⁹

As regards the specific measures the Commonwealth should put in place, the AWU sees merit in the quota-tariff system proposed by the ASI. This approach would effectively mirror that taken by our partners in the European Union, United Kingdom and United States. As well as demonstrating relevant precedent, this would address trade diversion from those important markets. These measures should first be imposed provisionally, then definitively into the medium-term.

The imposition of a tariff at a rate of 50%, applied to fabricated structural steel imported above a prescribed annual quota (determined with reference to the average yearly volume imported from 2020, or earlier) also affords due consideration to local steel purchasers as well as producers. The provision of a tariff-free quota would minimise disruption for purchasers; Even under similar market conditions to the present, the tariff would only apply to a minority of imports. Moreover, as fabricated structural steel is typically used as an input into larger, more complex and expensive products, the tariff's impact on end-users would be minimal. For the local fabrication industry, the use of a long-run average would ensure the quota is not prescribed solely with reference to post-surge import volumes.

With these or similar measures in place, the AWU is confident that unfair import competition would at least be mitigated - allowing local producers and dependent industries to attain greater stability, and helping address adverse impacts on the local steel workforce. Once implemented and after their medium-term expiration, the measures could be reviewed for efficacy.

Finally, we implore the PC and ultimately the Commonwealth to be guided not by a fear of likely objections from Australia's trade partners or local steel importers. Nothing but the ample evidence of serious and sustained injury to local workers and key industries, and ultimately the national interest, should carry the day.

With this in mind, we look forward to the outcome of the PC's investigation and welcome any queries regarding this submission.

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