



In the Productivity Commission

Peikko Australia Pty Ltd

Consideration of safeguard measures with respect to fabricated structural steel imports

1 May 2026

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A Australia’s national interest

Peikko Australia¹ and the international Peikko group of companies (collectively, “Peikko”) are driven by a commitment to innovation, excellence, and quality.² This extends to all aspects of governance and commercial behaviours including, of relevance to this inquiry, the environmental benefits inherent in and

¹ Peikko Australia Pty Ltd ACN 161 053 907

² See Attachment 1 – Peikko’s Quality, Environmental and Safety Management Certifications

delivered by (a) its products and (b) the on-site construction benefits and practices that its products require and encourage.³

Peikko's submission does not intend to *tell the Commission what it should do*. Rather, it intends to give a different perspective, which is to *illustrate what the Commission should not do*.

Let us explain. Peikko is a proud Finnish-based global organisation. Finland itself is a liberal, rules-based, free-trade supporter, especially with respect to industrial goods and services, and is largely well-open to foreign investment and business establishment. Amongst EU countries Finland is known to be a strong supporter of free trade principles. As well, Finland is one of the most environmentally friendly countries in the world (more about that later in this submission).⁴

Peikko thinks of itself as an ambassador for the open and progressive foreign investment, trade, and sustainability credentials of its home country, hence its strong interest in the Commission's inquiry into fabricated structural steel imports. Peikko manufactures structural steel products, some of which may be within the tariff lines that are the subject of the Commission's inquiry, and some which are not. In a number of cases, Peikko's products deliver truly innovative and significant environmental benefits to customers, projects, and communities all over the world.

So, what does Peikko mean, in saying that it wants to "*illustrate what the Commission should not do*"? There are two parts to this. The first is that Peikko recognises that Australia has a sovereign and WTO right to intervene in the trade freedoms it has granted to other countries, in accordance with WTO rules.⁵ Peikko does not intend to consider or to comment on the substantive issues or the conclusions the Commission may be able to arrive at with respect to the imposition of any "safeguard" trade measures on fabricated structural steel, except to urge the Commission to remember that:

- safeguard measures are designed for the public purpose of cushioning the structural adjustment of a relevant industry in order that it may respond to changes in competition in the form of a sharply increased level of imports;
- it is the province of anti-dumping and countervailing mechanisms, and not safeguard measures, to provide price relief where private corporations are materially injured by goods that are proven to have been dumped or are subsidised; and
- ultimately, and in accordance with Peikko's Finnish way of thinking, liberal trade policies are good for all concerned.

In contrast, and whatever it is that the Commission might otherwise recommend, Peikko's intention is to direct the Commission's attention to a *specific circumstance* in which safeguard measures *should not be imposed*. That circumstance is any goods falling within the scope of the inquiry that have unique environmental credentials. Peikko urges the Commission to preserve Australia's national interest by having regard to exemptions for properly defined "green products", thereby complying with the intent of Australia's international obligations, to encourage innovation, to maintain competitiveness, and to improve ecological sustainability. Any recommendation that is broadly prohibitive across entire tariff items, without allowing for exemptions to be made, would fail to achieve these objectives.

³ See Attachment 2 – Peikko's Quality and Environment Policy

⁴ See [World Population Review – Most Environmentally Friendly Countries 2026](#)

⁵ Agreement on Safeguards (adopted 15 April 1994, entered into force 1 January 1995) 1869 UNTS 154

This submission is an exploration of how good environmental outcomes can be achieved and maintained by supporting defined products that *should be exempted from the imposition of safeguard measures*, in light of the “national interests” that are so clearly identified in the *Productivity Commission Act 1998*.

It is only by undertaking such considerations and by creating space for implementation of these outcomes in its recommendations that the Commission will be able to satisfy its statutory obligation to have regard to the need, *inter alia*:

*...to encourage the development and growth of Australian industries that are efficient in their use of resources, enterprising, innovative and internationally competitive*⁶

and:

*...to ensure that industry develops in a way that is ecologically sustainable*⁷

and:

*...for Australia to meet its international obligations and commitments.*⁸

Safeguard measures inquiries in Australia are a rare thing. Recommendations to impose safeguard measures are even rarer. Further adding to the novelty, safeguard measures in the context of the WTO Agreements⁹ have never been imposed by the Australian Government.

This submission is intended to assist the Commission in applying its policy guidelines to the “special case” presented by the implementation of the WTO Agreement on Safeguards within the institution of the Productivity Commission and the framework of the *Productivity Commission Act 1998*. A recommendation to impose safeguard measures is contingent on the demonstration of various matters, one of which is a determination of serious injury. Here in Australia a safeguard measures inquiry exists within a policy framework and institution that must have regard to wider interests than only the financial position of the affected industry members. The Productivity Commission’s recommendations need to be tempered accordingly.¹⁰

The Commission has recognised this. The Call for Submissions poses questions as to what sort of measure could be put in place, and how this might best align with the public interest. We do not comment on whether the prerequisite conditions for the implementation of a safeguard measure are met, instead Peikko leaves that to its industry colleagues and the Commission’s good judgement.

In short, and consistent with Peikko’s own sense of innovation and the national and international interests of its customers around the world, Peikko’s goal is to present talking points and generate ideas that will assist the Commission in reporting to the Australian Government. The imposition of safeguard measures with respect to fabricated structural steel imports by an Australian Government would be a modern novelty. If that is contemplated, then Australia should also be alive to its national interest, an objective which involves the economic security of the entire community and not only the financial security of certain corporate enterprises.

⁶ *Productivity Commission Act 1998*, Section 8(1)(c)

⁷ *Ibid*, Section 8(1)(i)

⁸ *Ibid*, Section 8(1)(j)

⁹ Marrakesh Agreement Establishing the World Trade Organisation (adopted 15 April 1994, entered into force 1 January 1995) 1867 UNTS 154.

¹⁰ The *WTO Agreement on Safeguards* is not itself blind to the importance of the “public interest” in safeguard measures inquiries. Article 3.1 allows interested parties the opportunity “to submit their views... as to whether or not the application of a safeguard measure would be in the public interest”.

In the circumstances of Australia’s nuanced implementation of the Agreement in Safeguards, the Productivity Commission is compelled to report with the “national interest” factors of international obligation, innovation, competitiveness, and ecological sustainability in mind.

B Environmental commitments

Peikko is founded on ecological sustainability.¹¹ Peikko is committed to manufacturing high-quality products in an environmentally sound way. Peikko has a continuing goal to reduce not only its own carbon footprint but also the carbon footprint of the transport logistics that deliver its products and the construction chains that build the structures enabled by its products.

Australia works closely with international partners to address the impacts of climate change, specifically the reduction of carbon emissions. Australia has committed to reducing global emissions at both a domestic and international level.

Australia’s collaborative approach is evident in a number of its international treaties and trade relationships. At the “peak” of these is Australia’s signing of the Paris Agreement.¹² However Australia’s international “partnerships” and “accords”, as more directly relate to trade and sustainability, are not as frequently referred to. They may be a source of amazement to those who are not engaged with or fully informed about the subject matter.

We note these examples:

- Australia and Singapore pledge regulatory cooperation to each other on “low emissions trade”, including with respect to green products, under the *Australia–Singapore Green Economy Agreement*.¹³
- Australia has an agreement with Korea which, amongst other things, is intended to support each other’s net zero goals.¹⁴
- With Japan, Australia has endorsed a joint statement focussing, inter alia, on low-emission technologies.¹⁵
- Australia has other such instruments, involving Germany,¹⁶ the United Kingdom,¹⁷ and Korea,¹⁸ that are also noteworthy.

That some of these are pending or not yet in force is irrelevant to the question of whether the Commission is compelled to pay attention to them in making its recommendations. It is unarguable that the Australian Government has entered into these arrangements, nascent or otherwise, because they

¹¹ See Attachment 2.

¹² Paris Agreement (adopted 12 December 2015, entered into force 4 November 2016) 55 ILM 740.

¹³ Agreement between the Government of Australia and the Government of the Republic of Singapore on a Green Economy (Singapore–Australia Green Economy Agreement) (signed 18 October 2022, not yet in force)

¹⁴ Agreement between the Government of Australia and the Government of the Republic of Korea on a Green Economy Partnership on Climate and Energy (signed 20 December 2024, not yet in force)

¹⁵ Japan–Australia Partnership on Decarbonisation through Technology (Joint Statement, 13 June 2021)

¹⁶ Declaration of Intent between the Government of Australia and the Government of Germany on the Australia–Germany Hydrogen Accord (12 June 2021)

¹⁷ Australia–United Kingdom Partnership to Drive Low-Emissions Solutions, Letter of Intent between the Government of Australia and the Government of the United Kingdom (29 July 2021)

¹⁸ Australia–Republic of Korea Low and Zero Emissions Technology Partnership (Joint Statement, 31 October 2021)

are meant to articulate what the Australian Government believes is in Australia's national interest. That significance cannot be ignored.

Many of these arrangements expressly include references to the reduction of tariffs and to addressing any non-tariff barriers so as to facilitate trade and investment in what are referred to as "environmental" and "green" goods and services.¹⁹ And, even if not expressly mentioned, these instruments undoubtedly involve some level of cooperation and some parallel direction of the parties on trade-related aspects of environmental benefit. In some, WTO rights and obligations are recognised, with the Singapore-Australia Green Economy Agreement being a good example.²⁰

Although not an Australian treaty, the European Union - New Zealand Free Trade Agreement makes special provision for environmental goods, with a special annex, Annex 19, which contains a list of same. The European Commission's public announcement concerning the FTA states:

*...the agreement will make trade and investment in low-carbon goods, services, and technology easier. This includes zero tariffs on green goods and services, such as renewable energy, including wind turbine towers, solar panel elements, and energy-efficient products, from the first day of application. These goods and services contribute to achieving environmental and climate goals by preventing, limiting, minimising or remediating environmental damage to water, air and soil and by contributing to the dissemination of technologies that serve to mitigate climate change.*²¹

Annex 19 contains a "list of goods.... that contribute to mitigating climate change by efficient use of energy and dissemination of renewable technologies".²² Building related materials in List A include building insulation materials and renewable-energy components, which are identified as environmental goods that "contribute to addressing climate change and preservation of the environment".²³ The Annex is expressly linked to Article 2.5 (Elimination of customs duties), and the list is framed as illustrative of goods benefiting from the parties' commitments to liberalise trade in a "broad range of goods". Public summaries of the FTA emphasise that "green goods and services, such as renewable energy, including wind turbine towers, solar panel elements, and energy-efficient products" will be subject to zero tariffs from the first day of application, even though these items are in standard HS chapters (e.g. 73, 84, 85) which otherwise still bear MFN duties for like products from non-parties.

Note that not imposing a trade measure, that would have been soundly determined under WTO law if it had been imposed, could never be treated as a breach of WTO law, because such decisions are discretionary. The WTO Agreement on Safeguards clearly recognises the discretionary nature of any decision to impose or not to impose a safeguard measure and mentions the "public interest" in that context. Article 3.1 states as follows (in relevant part):

A Member may apply a safeguard measure only following an investigation by the competent authorities of that Member pursuant to procedures previously established and made public in consonance with Article X of GATT 1994. This investigation shall include reasonable public notice to all interested parties and public hearings or other appropriate means in which importers, exporters and other interested parties could present evidence and their views, including the opportunity to respond to the presentations of other parties and to submit their

¹⁹ The Singapore-Australia Green Economy Agreement includes as its Annex A-3 a "Mechanism to Identify and Address Non-Tariff Barriers".

²⁰ [Singapore-Australia Green Economy Agreement Official Text](#)

²¹ [European Commission Memorandum on the EU-Australia FTA](#)

²² Ibid, [Annex 19, List A chapeau](#)

²³ Ibid

views, inter alia, as to whether or not the application of a safeguard measure would be in the public interest. [underlining supplied]

Efforts to reduce emissions significantly involve the steel industry, as a high-level emitter of carbon. Iron and steel production is responsible for 6% to 8% of global emissions.²⁴ Producing lighter-weight steel products for uses that traditionally call for heavy steel (for example, heavier carbon steel H-beams and I-beams) reduces those emissions. This reduction is enjoyed not only in the factory but also in the logistics and construction industries that deliver and work with Peikko products to get a building from a hole in the ground to its topping-out in double-quick time.

C Welcome to Peikko's environment

Peikko is the global forerunner in slim floor structures and connection technology for precast and cast-in-situ construction. Its business model is founded on innovation, ecological sustainability and quality. The Peikko group has a clear focus on regularly introducing new, tested, and innovative solutions and services. Its products are designed in Finland and are manufactured by Peikko in both Finland and in partner factories across 11 other countries.

That Finland, a Scandinavian country, should be the inventive home of Peikko products should come as no surprise. According to the World Population Review's rankings of the Most Environmentally Friendly Countries 2026, Finland ranks second overall in the world, with the top five rankings on the ladder being occupied by it and its neighbouring countries.²⁵

Peikko's "green" narrative is associated with design, efficient energy usage, efficient structures and expedited construction processes, all of which go towards the reduction of Peikko's own carbon footprint; the reduction of the carbon footprint of the trades involved in construction of buildings using Peikko-supplied beams; and reduction of the ongoing carbon footprint of buildings constructed with Peikko-supplied beams, based on lower life cycle running costs. Moreover, Peikko can even further optimise the sustainability of its beams, by using "green steel", an optional feature based on customer request.

To frame the national interest considerations that the Productivity Commission may need to consider, with respect to any uniquely environmentally friendly proprietary products that fall within the scope of the inquiry and any recommendations made, and give some flesh to how an exemption system might work, Peikko now offers-up its own products as test cases, regardless of whether they are within the inquiry scope.

1 DELTABEAM composite beam

Peikko exports inventive welded steel sections, known in the industry by the proprietary name DELTABEAM composite beams, to many countries, including Australia. These steel sections are designed specifically for use in Peikko's DELTABEAM Slim Floor Structure designs. This product is not for low-cost corner cutting. It is of premium quality, intended for projects committed to superior efficiency, quality, sustainability, safety, and innovation.

Peikko's DELTABEAM is imported as a welded steel section and is merged with concrete on site. This unique composite action and DELTABEAM's slim floor design maximises construction efficiency and makes the system unlike any other product on the Australian market.

²⁴ See [Australia's green metals gambit](#)

²⁵ See [World Population Review – Most Environmentally Friendly Countries 2026](#)

Attribute	Attribute explained
Slim floor design	The steel and concrete composite action of DELTABEAM reduces floor thickness by 10% to 30% when compared to conventional options. This lowers heating and cooling costs by between 20% to 30%, and gives flexibility for increased room height, more floors for a given building height, and a lower building height overall.
DELTABEAM Green	Peikko offers an even more ecologically sustainable option when it manufactures DELTABEAM Green beams using 90% recycled materials. Offering the same benefits as DELTABEAM standard beams, the Green beam cuts CO ₂ emissions by up to 50%.
Minimised waste	The DELTABEAM prefabricated components are made with precision through laser cutting, which minimises wastage, with any remnants capable of being processed into other Peikko products. The DELTABEAM's design goal is to use the minimal amount of material required to support floors, including the minimum amount of concrete, using hollow-core slabs. Projects using Peikko's DELTABEAM Slim Floor Structure designs can benefit from the reduction in the weight of the entire structure by up to 25% compared to conventional designs.
Integrated fireproofing	Integrated fireproofing offers additional time and cost savings. The reinforcement inside the beam ensures lifelong fireproofing. Proven by multiple full-scale fire tests, DELTABEAM Slim Floor Structure is fireproofed even up to four hours without any additional fireproofing material required, making it uniquely suited to Australia's increased environmental risks.
Reduced construction time	Each DELTABEAM is uniquely designed, while the perfect fit and pre-designed, standardized connections make the structure extremely fast to erect. In fact, a small crew can erect a multi-story building up to 50% faster with DELTABEAM compared to other systems on the market. DELTABEAM also requires little or no propping and can be supplied with integrated safety rail mounts.
Tested and certified	Production of the main production units is certified according to EU standards ISO 9001:2015 (international standard for Quality Management Systems); ISO 14001:2015 (international standard for Environmental Management Systems), ISO 45001:2018 (international standard for Occupational Health and Safety management systems); ISO 3834 (international standard for quality requirements in the fusion welding of metallic materials); and EN 1090 (mandatory European standard for manufacturers of structural steel and aluminum components). Peikko source factories exporting to Australia are certified by American Institute of Steel Construction (AISC), by Canadian Welding Bureau (CWB) and by Standards Australia (AS). Peikko has also certified the relevant parts of its supply chain in accordance with ISO 19443:2018 (an international standard specifying quality management system requirements for the nuclear energy sector supply chain) so as to be able to manufacture products for use in the nuclear energy sector.
Specific needs addressed	Peikko has committed itself to innovation in construction for the specific needs of data centres, healthcare centres, community centres, bridges, and manufacturing plants. Peikko recently delivered a 20,000 sqm data centre in Sydney, ²⁶ and is currently partnered with Oriem in a Texco Construction project delivering a 31,000 sqm logistics centre in Smeaton Grange, also in the Sydney area. ²⁷

²⁶ See Attachment 3 – Peikko Projects: Sydney Data Centre.

²⁷ See Attachment 4 – Texco Smeaton Grange Project

2 BOLDA column shoe

The BOLDA Column Shoe represents a new generation of high-load capacity column shoes being championed by Peikko. It is characterized by its efficiency, compactness, and ETA-verified resistances, and offers best-in-class performance. It is the *only* ETA-assessed bolted column connection for high loads worldwide.²⁸

The BOLDA Column Shoe is a testament to Peikko's relentless pursuit of innovative efficiency. The BOLDA Column Shoe has been meticulously optimised, resulting in a more compact design compared to that of any of our competitors. This enables BOLDA to be easily handled and installed. Further, the compactness of the BOLDA Column Shoe allows for an up to 24% reduction in column cross-sections when compared to the Peikko Column Shoe that preceded the BOLDA model. This reduction in cross-section size leads to a more efficient utilisation of materials and enhances space utilisation within buildings.

Additionally, the BOLDA Column Shoe significantly improves work safety on construction sites, in two ways. First, it requires less workers to install compared to conventional column shoes. Second, the bolted connection offered by the BOLDA Column Shoe does away with construction site props, making the site itself safer for workers and allowing for a faster and more efficient construction process.

D Safeguard exemptions in other jurisdictions

A safeguard measure is an emergency measure which may be applied to protect domestic industry from increased quantities of imports relative to domestic production. Such measures are intended to be remedial and short term. If imposed, they provide a regulated environment for imports in the form of temporary trade barriers that can involve a quantitative restriction, increased tariffs, and tariff quotas. Although such action cuts across the usual free trade commitments of WTO countries, it is allowed, in a WTO context, if the measures are imposed with proper regard to the conditions for their imposition under the Agreement on Safeguards and are arrived at by following the proper inquiry procedures stipulated in that Agreement.

The Productivity Commission would be correct to share the Australian Steel Institute's concern for carefully measured design and implementation to minimise adverse effects, including for Australian consumers and importers, in the application of any such measures at the border.²⁹

One such method of targeting measures to minimise adverse effects is to provide product-based exemptions which narrow the scope of safeguards and reduce their collateral impact. Exemption mechanisms have assisted model jurisdictions such as the EU and US to improve the focus and accuracy of safeguard measures and could similarly be deployed in the Australian context in the Productivity Commission's recognition of the "national interest".

The exemption of environmental products as a "protected class" of products that, in the context of a country's national interest, need not be subject and should not be subject to tariffs, in a non-safeguards context, is increasingly commonplace in world trade. There is also precedent for product-based exemptions in other jurisdictions in a safeguards measures context, which may also serve to illuminate possible avenues for Australia in its own design of such exemptions. Justification for such exemptions

²⁸ The term "ETA" refers to European Technical Assessment which serves to officially verify steel construction components that have undergone rigorous testing to confirm their performance, quality, and safety in accordance with European technical specifications. These assessments are vital for structural components, ensuring reliability for a working life of at least 50 years (sometimes 100).

²⁹ Application for Australian Provisional and Definitive Safeguards, Australian Steel Institute, page 53

may emerge during an inquiry process, or exemptions may be allowed or revoked on application once safeguard measures are in place.

The following examples show how safeguard measures user jurisdictions consider and apply exemptions in a flexible manner to respond to competing stakeholder concerns and their jurisdiction's "national" or "public" interest. Safeguard measures imposed wholly and blindly across a pre-inquiry selection of tariff lines, and every kind of product within them, without there being an ability for exemption of products that respond to a "national interest" concern at the end of the process or in the future, would prevent the Productivity Commission from properly exercising its powers and obligations under Section 8(1) of the *Productivity Commission Act 1988*.

We offer the below analysis to demonstrate that exemption systems exist in other countries to accommodate special circumstances, and to encourage the Productivity Commission to extend its recommendations to the kinds of legislative and administrative changes that would need to be made in the Australian context to implement such exemptions here.

1 European Union

Under EU Regulation 2015/478,³⁰ safeguard measures must be preceded by a Commission investigation assisted by a Committee on Safeguards. The investigation must give opportunity for interested parties to submit their views.

Through this process, the Commission may:

- exclude certain products from the outset - Article 24 allows the Commission to define the product scope of the measure so that certain products/tariff subheadings are simply not covered from the outset, which in practice is used to exclude products not thought to be contributing to serious injury; or
- provide exemptions for certain products after investigations conclude – this occurs pursuant to a continuing ability to review and adjust measures under Article 19.

Recent safeguards imposed on ferro-alloys presents a good example of the exercise of both these discretions. The European Commission noted the exclusion of specific HS codes within calcium silicon products from the outset.³¹ Then, following the investigation, and in consideration of the needs of the chemicals industry for competitively priced silicon metal inputs, calcium silicon and silicon metals were exempted from the safeguard measures entirely.³²

2 United States

The US safeguards regime falls under s 201 of the *Trade Act 1974*,³³ which allows for positive adjustments to import competition settings. Under US procedure, stakeholders may comment via submissions and public hearings during the recommendation and investigation process. Following the Presidential proclamation of the initial statement of the safeguard measure and the scope, which includes an explicit list of any excluded products, there is a second opportunity for interested parties to request the further exclusion of products from the safeguard. Requests for exclusion identify the particular product in terms of the characteristics which distinguish it from other products subject to the

³⁰ [Regulation - 2015/478 - EN - EUR-Lex](#)

³¹ [EUR-Lex - 52024XC07541 - EN - EUR-Lex](#)

³² [EC Imposes Safeguard Measures on Ferro-Alloys: EU Trade](#)

³³ [Trade Act 1974, Section 201](#)

safeguard.³⁴ The US Trade Representative continues to monitor the context and can call for further submissions at their discretion as circumstances change.

For example, in the *Exclusion of Particular Products from the Solar Products Safeguard Measure 2018*,³⁵ seven categories of goods were exempt from safeguards measures. This included products with specialised function or composition.

E A “fit for purpose” Australian safeguard

A provisional or definitive safeguard measure would be a novel legal development in Australia. There is no precedent for the extraordinary imposition of these measures, and little guidance as to the mechanisms which might operate to implement them. We submit that this novelty should be favourably exploited in order to design a system that is “fit for purpose”. In short, if the Commission is minded to recommend the *imposition* of safeguard measures, then why not accommodate national interest concerns by also recommending a legal and administrative system for the *non-imposition* of safeguard measures with respect to certain products?

Australia’s notification to the World Trade Organisation of its laws and procedures relating to safeguard measures notes that there is no specific legislation for the imposition of safeguard measures.³⁶ Rather, the notification states that:

*...if required, quotas would be imposed through regulations under the Customs Act 1901 and increases in tariff through a Tariff Bill or Notice thereof.*³⁷

The ASI application requests a tariff rate quota, with tariffs of over 50% past the quota amount.³⁸

Safeguards are becoming more prevalent as a remedial measure designed to give opportunities for domestic industries that are considered to be important to the national interest an opportunity to recover from unexpectedly high import levels and to thereafter compete on the open market to the best of their ability. As observed by the WTO Dispute Settlement Body, there is a natural tension between, on the one hand, defining the appropriate and legitimate scope of the right to apply safeguard measures and, on the other hand, ensuring that safeguard measures are not applied against “fair trade” beyond what is necessary to provide extraordinary and temporary relief.³⁹

The Productivity Commission is called upon to begin the calculation of this balance, considering not only whether safeguard measures are justified, but whether they are in the national interest. Further, the Commission must consider its general policy guidelines in promoting the subject Australian industry to be enterprising, innovative, internationally competitive, ecologically sustainable, and must be attentive to Australia’s social and economic goals and international commitments in doing so.⁴⁰ It is not only about “a *stable and efficient domestic industry*”. Balancing the sometimes competing priorities that are presented is a challenge demanding careful regulatory design and implementation.

³⁴ [Federal Register: Exclusion of Particular Products From the Solar Products Safeguard Measure](#)

³⁵ [Federal Register: Exclusion of Particular Products From the Solar Products Safeguard Measure](#)

³⁶ [Notification of Laws and Administrative Procedures Relating to Safeguard Measures – Australia \(G/SG/N/1/AUS/2\)](#)

³⁷ Ibid.

³⁸ [ASI Application for Australian Provisional and Definitive Safeguards](#), para. 240.

³⁹ [US - Line Pipe](#), para. 83 (WT/DS202/AB/R).

⁴⁰ [Productivity Commission Act 1998](#), Section 8.

We suggest that in determining the form of a safeguard measure, if such a measure is found to be justified, the Commission should consider how exemptions can be used to achieve a better fit with Australia's other equally important national interests.

The ASI application raises important points as to the need for supply security, the minimisation of negative downstream impacts, and the promotion of innovation and development. Exemptions could well be the key to achieving exactly that. The exclusion of products with critical benefits to the public interest, such as products with no locally produced alternative, products in demand exceeding Australian production capacity, or those with particular benefits for environmental or social goals, would ensure that safeguard measures operate only so far as is absolutely necessary, and are pragmatically beneficial to, and do not act against, Australia's national interest.

Therefore, we suggest that legislation should make provision for a Minister in a relevant portfolio, such as the environmental portfolio, to authorise exemptions for products from quantitative limits and/or higher tariffs, whether independently or in collaboration with the Minister for the industry portfolio. The authorisation for exemption could be set out in enabling legislation. The enabling legislation could be much like the "by law" approach adopted in Schedule 4 of the *Customs Tariff Act 1995*, with the particular national interest-themed reason for each specific product-type exemption being spelt out as individual items therein.

F Concluding remarks

Peikko thanks the Commission for its consideration and will continue to monitor the inquiry process and will contribute further, if that is seen to be necessary, as the inquiry moves forward.

Peikko does so consistent with its culture of innovation, ecological sustainability, and quality, and not only in its own interest but also in the interests of its customers and the communities of Australia and the world.

Peikko believes that alignment with the many international agreements that pursue the climate change goals that are critical for the health of humankind and the preservation of the Earth's natural habitats should be embedded in the industrial and trade practices of all countries.

For and on behalf of the international Peikko Group of companies

Partner Director

Lawyer

Attachment 1
Peikko's Quality, Environmental, and Safety Management Certification



MANAGEMENT SYSTEM CERTIFICATE

Certificate no.:
151277-2014-AQ-FIN-FINAS

Initial certification date:
10 June 2002

Valid:
19 December 2025 – 12 September 2028

This is to certify that the management system of
Peikko Group Corporation
15170 Lahti, Finland

and the sites as mentioned in the appendix accompanying this certificate

has been found to conform to the Quality Management System standard:
ISO 9001:2015

This certificate is valid for the following scope:

Product development, production and marketing of concrete connections. Design, production and marketing of composite beams and composite columns. Design, production and marketing of steel structures.

Place and date:
Espoo, 19 December 2025

For the issuing office:
DNV - Business Assurance
, 02150 Espoo, Finland



Kimmo Haarala
Management Representative

Appendix to Certificate

Peikko Group Corporation

Locations included in the certification are as follows:

Site Name	Site Address	Site Scope
Peikko Group Corporation	15170 Lahti, Finland	Product development, production and marketing of concrete connections. Design, production and marketing of composite beams and composite columns. Design, production and marketing of steel structures.
Peikko Construction Material (China) Co., Ltd	, North Region (Yang She Town) Technological Development Zone, Zhangjiagang, Jiangsu, China 215600	Production and marketing of concrete connections. Production and marketing of composite beams and composite columns. Production and marketing of steel structure components.
Peikko Finland Oy (Vipusenkatu 10 A, Lahti)	, 15230 Lahti, Finland	Product development, production and marketing of concrete connections. Design, production and marketing of composite beams and composite columns. Design, production and marketing of steel structures.
Peikko Finland Oy (Vipusenkatu 10 B, Lahti)	, 15230 Lahti, Finland	Product development, production and marketing of concrete connections. Design, production and marketing of composite beams and composite columns. Design, production and marketing of steel structures.
Peikko Finland Oy (Vipusenkatu 10 C, Lahti)	, 15230 Lahti, Finland	Product development, production and marketing of concrete connections. Design, production and marketing of composite beams and composite columns. Design, production and marketing of steel structures.
Peikko Finland Oy (Vipusenkatu 12, Lahti)	15230 Lahti, Finland	Product development, production and marketing of concrete connections. Design, production and marketing of composite beams and composite columns. Design, production and marketing of steel structures.
Peikko Finland Oy (Vipusenkatu 14, Lahti)	, 15230 Lahti, Finland	Product development, production and marketing of concrete connections. Design, production and marketing of composite beams and composite columns. Design, production and marketing of steel structures.
Peikko Finland Oy (Vipusenkatu 16, Lahti)	15230 Lahti, Finland	Product development, production and marketing of concrete connections. Design, production and marketing of composite beams and composite columns. Design, production and marketing of steel structures.

Site Name	Site Address	Site Scope
Peikko Finland Oy (Vipusenkatu 20, Lahti)	, 15230 Lahti, Finland	Product development, production and marketing of concrete connections. Design, production and marketing of composite beams and composite columns. Design, production and marketing of steel structures.
Peikko Finland Oy (Voimakatu 3, Lahti)	15170 Lahti, Finland	Product development, production and marketing of concrete connections. Design, production and marketing of composite beams and composite columns. Design, production and marketing of steel structures.
Peikko Deutschland GmbH	, 34513 Waldeck, Germany	Product development, production and marketing of concrete connections. Design, production and marketing of composite beams and composite columns. Design, production and marketing of steel structures.
Peikko Deutschland GmbH (Bad Boll)	73087 Bad Boll, Germany	Planning, production and distribution of tension rod systems and compression rod systems.
Peikko Magyarország Kft.	, Kossuth Lajos u. 40., Hungary	Product development, production and marketing of concrete connections. Design, production and marketing of composite beams and composite columns. Design, production and marketing of steel structures.
UAB Peikko Lietuva" (Naglio str., Kaunas)"	, 52367, Kaunas, Lithuania	Product development, production and marketing of concrete connections. Design, production and marketing of composite beams and composite columns. Design, production and marketing of steel structures.
UAB Peikko Lietuva "(R. Kalantos str., Kaunas)"	Lithuania , 52303, Kaunas,	Product development, production and marketing of concrete connections. Design, production and marketing of composite beams and composite columns. Design, production and marketing of steel structures.
Peikko România S.R.L.	, 087015, Bolintin Deal Village, Giurgiu County, Romania	Product development, production and marketing of concrete connections. Design, production and marketing of composite beams and composite columns. Design, production and marketing of steel structures.
Peikko Slovakia s.r.o. (660, Kráľová nad Váhom)	, 925 91 Kráľová nad Váhom, Slovak Republic	Product development, production and marketing of concrete connections. Design, production and marketing of composite beams and composite columns. Design, production and marketing of steel structures.
Peikko Gulf LLC	Al Hamra Industrial Zone, Ras Al Khaimah, United Arab Emirates	Product development, production and marketing of concrete connections. Design, production and marketing of composite beams and composite columns. Design, production and marketing of steel structures.

Attachment 2
Peikko's Quality and Environment Policy



QUALITY AND ENVIRONMENTAL POLICY

Peikko's operations are based on localized and reliable customer service, excellence in R&D and manufacturing. This includes good co-operation with customers and other stakeholders, as well as within society. Our overall aim is to consistently deliver high-quality products and services and to work in an environmentally aware manner.

Our quality goal is high customer satisfaction, which means:

- development of new innovative and cost effective products
- reliability of purchased materials and sourcing
- high-quality products and delivery accuracy
- efficient production
- dedicated and professional employees

To accomplish sustainable development principles we aim to minimize environmental impact by:

- increasing energy efficiency
- decreasing waste and increasing re-cycling
- preventing negative environmental incidents
- systematically training employees for their personal and professional growth

All our employees are committed to continuous improvement of quality and environmental aspects and to comply with legal requirements and regulations.

Peikko's management supports and invests in our personnel, their professional development and competence, and in the conditions of our operating environment.

The Quality and Environmental Policy of the company applies to all personnel and is communicated to all employees and made available to all interested parties.

Attachment 3
Peikko Projects: Sydney Data Centre

Peikko Australia's Post

Peikko Australia
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Project Spotlight on a Data Centre in Sydney: Our solution played a key role in the delivery of this four-storey, 20,000-square-meter data centre, built to house critical IT infrastructure. With 227 beams covering about 2225 metres, including a Deltabeam spanning over 15 metres, the structure features a hollowcore plank slab system and heavily reinforced concrete elements. Designed for efficiency and durability, this project showcases the strength and flexibility of Peikko's solutions in high-performance construction.

Project Spotlight

**Peikko Projects:
Sydney Data Centre**

Attachment 4
Texco Smeaton Grange project

Peikko Australia's Post

Peikko Australia
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Success on site starts long before the first pour.

Great to be on-site at Texco's Smeaton Grange project in Sydney. This 31,000 sqm logistics facility is a massive undertaking. While the internal slabs are yet to be poured, the groundwork for a high-performance floor is already being laid.

At Peikko, we believe true value isn't just about the product. It is about being reliable from concept to completion. Together with our partner **Oriem**, we are working closely with the project teams to ensure that when the time comes, the execution is flawless.

By combining Peikko's engineered jointing systems and technical support, with Oriem's local availability, we are ensuring:

- ◆ Precision Planning: Early-stage involvement to prevent on-site delays.
- ◆ Local Agility: Products ready for dispatch exactly when the schedule demands.
- ◆ Technical Presence: We don't just ship boxes. We show up on-site to ensure the right solutions are in place.

Strong partnerships turn complex logistics into streamlined progress. We are proud to support **Texco Construction** in delivering this state-of-the-art facility.

#PeikkoAustralia #TexcoConstruction #Oriem #ConcreteSlabs #SupplyChainExcellence #BuildingTogether #IndustrialConstruction #SydneyConstruction

