

**Supplementary Submission****Following Public Hearings Safeguards inquiry into the import of fabricated structural steel****Company name:** Brezac Constructions Pty Ltd**Address:** Crestmead, Queensland, Australia**Executive Summary**

Brezac Constructions Pty Ltd provides this supplementary submission following the public hearings held in May 2026 in relation to the fabricated structural steel safeguards inquiry.

Brezac supports safeguard measures for fabricated structural steel. Our position is based on direct operational experience as a long-established Australian fabricator supplying infrastructure, transport, mining and industrial projects across Australia.

The hearings demonstrated the complexity of the fabricated structural steel sector and raised broader issues relating to productivity, procurement, compliance systems and industry competitiveness. These discussions were valuable and deserve careful consideration.

Broader industry reform issues should not obscure the practical operational evidence of injury and instability being experienced by businesses such as Brezac that compete directly with imported fabricated structural steel.

Brezac respectfully submits that it is important to maintain clear distinction between:

- the safeguard question before the inquiry;
- broader construction compliance and regulatory matters; and
- longer-term productivity and industry reform discussions.

This submission also seeks to clarify several operational realities that may not always be visible from high-level market data, including:

- the fragmented nature of local participation on imported projects;
- the importance of economies of scale to fabrication productivity;
- and the fact that fabricated structural steel markets extend well beyond National Construction Code-regulated building work.

**1. Introduction**

Brezac Constructions Pty Ltd is a second-generation Australian family business based in Crestmead, Queensland. The business has operated within the fabricated structural steel industry for more than 35 years and supplies fabricated structural steel to major infrastructure, transport, mining and industrial projects across Australia.

As outlined in Brezac's earlier submissions, the business operates from a purpose-built fabrication facility with more than 20 fabrication workstations and the capacity to deliver more than 12,000 labour hours per month. Brezac has also invested heavily in compliance capability, including certification to ISO standards and AS/NZS 5131 Construction Category 3 requirements.

This supplementary submission is intended to stand alone while expanding on operational matters previously raised by Brezac.

## 2. Observations Following the Hearings

The public hearings demonstrated the complexity of the fabricated structural steel sector and the wide range of interests connected to the inquiry.

Participants approached the inquiry from a variety of perspectives including:

- trade and international competition;
- construction costs;
- productivity;
- compliance systems;
- engineering and procurement;
- sovereign capability;
- industry reform; and
- downstream project delivery.

As the hearings progressed, discussion occasionally broadened into adjacent areas such as:

- construction compliance enforcement;
- National Construction Code application;
- certification systems;
- procurement policy;
- broader productivity debates; and
- general industry competitiveness.

These issues may warrant further examination. However, many operational fabricators prepared submissions focused on the safeguard framework itself rather than on broader reviews of construction regulation or industrial policy.

For that reason, broader policy discussions should not dilute the evidentiary focus of the inquiry.

## 3. Maintaining Focus on the Safeguard Framework

Brezac respectfully submits that the safeguard inquiry should remain focused on the relationship between increased imports and the condition of the domestic fabricated structural steel industry.

The existence of broader industry challenges does not mean import injury is not occurring within businesses such as Brezac that compete directly with imported fabricated structural steel.

The Terms of Reference require the Commission to consider whether increased imports of fabricated structural steel have caused, or are threatening to cause, serious injury to the domestic industry and whether safeguard measures are warranted. Discussions regarding productivity, construction regulation, certification systems and broader industry reform are important considerations in their own right. They should not displace the central task of assessing the relationship between increased imports and the condition of the domestic fabricated structural steel industry.

The question is not whether improvement is required, but whether businesses have sufficient stability to continue making those investments.

Stable utilisation and continuity of work are critical when seeking to improve productivity. It becomes significantly more difficult to invest confidently in:

- automation;
- workforce development;
- process optimisation;
- equipment upgrades; and
- compliance capability

when major fabrication scopes are increasingly lost to imports and domestic work becomes fragmented and irregular.

The evidentiary basis supporting some industry-wide conclusions was not always clear from the hearing record.

It is important to distinguish between:

- broader policy commentary;
- isolated operational experiences; and
- evidence capable of supporting conclusions across the domestic fabricated structural steel sector.

#### **4. Understanding the Fabricated Structural Steel Market**

The fabricated structural steel market is broader and more segmented than some hearing discussions may have implied.

Fabricated structural steel is supplied into a wide range of applications including:

- commercial and industrial buildings;
- bridges and transport infrastructure;
- rail and road projects;
- mining and resources infrastructure;
- industrial processing facilities;
- energy infrastructure;
- public infrastructure and civil works;
- access systems, platforms and gantries.

These sectors do not necessarily operate under identical procurement models, engineering standards or compliance pathways.

Some hearing discussion focused on the National Construction Code and associated compliance systems. The National Construction Code is Australia's primary technical framework for buildings and associated structures. However, many fabricated structural steel applications operate within infrastructure, mining, transport and industrial project environments governed by separate project specifications, authority standards and engineering requirements.

For example, bridges, mining structures, industrial plant, transport infrastructure and energy projects may be governed by:

- project-specific technical specifications;
- transport authority requirements;
- Australian Standards;
- client engineering standards; and
- contractual compliance obligations

rather than directly through National Construction Code building approval pathways.

It is also important to distinguish between:

- the National Construction Code as a building regulatory framework;
- AS/NZS 5131 as a fabrication and erection standard for structural steel; and
- project-specific compliance systems used within infrastructure and industrial projects.

These frameworks can overlap, but they are not identical.

During the hearings, the Commission asked for examples of fabricated structural steel applications that would not be subject to the National Construction Code. That line of questioning highlighted the importance of understanding where different regulatory and compliance systems apply within the broader fabricated structural steel market.

## **5. Local Participation Does Not Necessarily Mean Local Fabrication Health**

One operational issue that may not always be visible from high-level market data is the difference between local participation on a project and retention of the primary fabrication scope.

In Brezac's experience, imported fabricated structural steel projects can still involve Australian fabricators. However, the local work can be limited to fragmented scopes such as:

- early works requiring short lead times;
- holding down bolts;
- temporary structures;
- site-measured items;
- small brackets or ancillary components;
- late-stage modifications;
- cover plates and signage; or
- remediation and rectification works.

These activities are commercially important, but they do not replace the economic value of the primary fabrication package.

The main structural fabrication scope is typically where:

- workshop utilisation;
- labour continuity;
- workflow efficiency;
- economies of scale; and
- productivity improvements

are achieved.

## **6. Operational Injury and Industry Stability**

Brezac's earlier submissions described examples of major projects where domestic fabrication capability existed, but major fabrication scopes were sourced overseas.

The practical impact is not limited to individual lost projects. The broader issue is market instability.

Fabrication businesses like Brezac rely on continuity of workload to support:

- workforce planning;
- apprenticeship development;

- machinery utilisation;
- compliance systems;
- supervision capability; and
- long-term investment decisions.

Business cannot easily scale labour, overheads and compliance obligations up and down in response to irregular project flow.

When major fabrication scopes are lost offshore, domestic fabricators are often left with:

- lower utilisation;
- compressed margins;
- irregular workflow;
- reduced investment confidence; and
- increased difficulty retaining skilled labour.

This is particularly important for businesses like Brezac that have already invested heavily in facilities, workforce capability and compliance systems in anticipation of long-term demand.

In Brezac's view, this practical operational instability should remain central to the Commission's assessment of injury and adjustment.

## **7. Productivity, Reform and Safeguards**

The hearings raised legitimate questions regarding productivity, procurement practices, compliance systems and industry competitiveness.

These are important issues and should not be ignored. Australian fabricators must continue improving and adapting.

Productivity reform and safeguard measures should not be framed as mutually exclusive approaches.

Businesses like Brezac experiencing unstable utilisation, fragmented project flow and sustained margin pressure will struggle to invest confidently in:

- automation;
- process improvement;
- workforce development;
- technology adoption; and
- long-term operational efficiency.

In Brezac's view, temporary safeguard measures can assist by providing a more stable commercial environment to continue investing in:

- skilled labour;
- apprenticeships;
- compliance capability;
- plant and equipment;
- workflow improvements; and
- productivity initiatives.

## 8. Final Observations

Brezac supports safeguard measures for fabricated structural steel.

The hearings demonstrated that fabricated structural steel intersects with broader questions relating to productivity, compliance, procurement, construction regulation and industrial capability. These are legitimate and important issues.

The Commission's analysis should continue to give appropriate weight to the practical operational evidence being experienced by Australian fabricators directly exposed to import competition.

The fabricated structural steel sector is not an abstract market. It consists of workshops, tradespeople, apprentices, supervisors, engineers and project teams supporting Australia's infrastructure, transport, mining, industrial and energy capability.

Broader industry reform discussions are important, but they should not obscure the practical evidence of injury, instability and capability erosion being experienced by businesses such as Brezac within the domestic fabricated structural steel sector.

Brezac respectfully submits that temporary safeguard measures are warranted to support adjustment, investment confidence and the continued development of domestic fabrication capability.