



# CCCCMC

CHINA CHAMBER OF COMMERCE OF METALS,  
MINERALS & CHEMICALS IMPORTERS & EXPORTERS

1 June 2026

**Dr Catherine de Fontenay, Commissioner**  
**Mr Barry Sterland PSM, Commissioner**  
**Productivity Commission**  
**GPO Box 1428**  
**Canberra City**  
**Australian Capital Territory 2601**  
**Australia**

Dear Commissioners

## **Australian safeguards inquiry re fabricated structural steel imports CCCCMC response to queries from the public hearing**

CCCCMC (“the Chamber”) once again thanks the Productivity Commission for the opportunity to appear before the Commissioners in relation to the fabricated structural steel safeguards inquiry. During the Chamber’s appearance, the Commissioners expressed interests for the Chamber to provide further information in relation to certain topics. The Chamber now provides its responses to the Commissioners’ queries to the best of its abilities.

### **A Questions raised during hearing with CCCCC**

**1 Installed capacity and usage:** *We understand that the fabricated structural steel industry in China is relatively capital intensive and so there could be relatively large installed capacity and we would welcome any data that the Chamber of Commerce wishes to supply on installed capacity and the use of that capacity over the last 5-10 years.*

The Chamber has consulted with its members and a peer industry association in China, being the China Steel Construction Society (“CSCS”), and can provide the following information for the Commission’s consideration:

- There are currently no official statistics maintained in relation to the installed capacity or output of the Chinese FSS industry.
- Fabricated structural steel (in its general meaning used by the industry, which covers the product under consideration for this inquiry) encompasses a very broad range of products, from rudimentary structures which have low barriers to entry due to the limited capital investment required for particular devices, all the way to highly technical and large structures which may

require much more advanced technology and higher capital outlay. In other words, the highly customisable nature of fabricated structural steel renders it less amenable to a standardised measure of production capacity and output.

- The Chamber is informed by CSCS that production capacity can also vary depending on the type of fabrication involved. For instance, on the more common fabrication model in China that involves the use of steel plate for further welding into structures, as compared to the use of semi-finished hot rolled structural steel (such as H-beam) as the more common raw material in Australia, the CSCS uses a rough estimation method of 1 tonne per square metre of factory floor area to measure annual capacity.

**2** **Modular construction:** *...you raised the issue of the shift to modular construction. So that is a topic where we would welcome some additional information from the Chamber of Commerce. So if there are particular changes in the techniques used in construction that facilitate or impede the use of, say, break bulk import fabricated steel or containerized fabricated structural steel, that would be helpful.*

The Chamber obtained feedback from CSCS that the acceptance of modular design based fabricated structural steel products has been a growing trend over recent years. The Chamber understands that it was not possible to identify any specific technical breakthrough that contributed to this development. Instead, this reflects the made-to-order and custom design features of the industry – as fabricators simply respond to customers requirement and designs. In other words, such changes are market/demand side driven. As a general observation, the Chamber understands that the increased adoption of “modular design”-based FSS products are market/customers’ responses to cost increases and project timelines, especially in the context of higher labour cost and the shortage of skilled labour. The use of modular designs is aimed to reduce the complexity and workload of on-site assembly and welding requirements.

## **B Questions raised during hearing with MOFCOM**

The Chamber also notes that the Commissioners raised several questions during the hearing with the representative from the Ministry of Commerce of China. The Chamber takes liberty to provide its comments to some of these questions, to the extent that the Chamber and its members would be well placed to directly respond to such queries.

**1** **Exports by Chinese industry:** *...if you could help us source what has been happening in the Chinese industry domestically and its exports more generally, like any exports to third countries, that data could be helpful. So if you can work with the industry to send back a short communication with maybe links to data sources that we can see. Thank you.*

The Chamber has consulted with the CSCS and is informed that approximately 90% of fabricated steel structures production is consumed domestically in China, with rest exported. The Chamber refers to the export data obtained from Chinese Customs to the Commission in its submission dated 4 May 2026, covering the products under 7308.10 and 7308.90.

**2** *FSS costs in bridges: Do you know what share of total costs in a bridge is structural steel?*

The Chamber has consulted with the CSCS and is informed that such estimation is not possible. This is because the costs for bridge constructions projects are highly complex, and the costs would vary significantly depending on the design and materials used (and to what extent it uses FSS, reinforced concrete, and other materials).

**FOR AND ON BEHALF OF CHINA CHAMBER OF COMMERCE OF METALS, MINERALS & CHEMICALS IMPORTERS & EXPORTERS**

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