

Statement of Reasons for Withholding Information from the Public File

This Statement of Reasons sets out why 7 Steel UK is unable to place certain supporting evidence documents on the public record, why it is not possible to produce a meaningful non-confidential summary of these documents, and the basis on which confidentiality is claimed. The documents referenced below contain proprietary, commercially sensitive, or licensed third-party data that cannot be legally shared but would be available directly from the authors.

1. China International Disruption

Nature of the Document

This document contains detailed analysis of Chinese steel production, export behaviour, and international trade disruption, including forward-looking assessments.

Reason Non-Confidential Summary Cannot Be Provided

The value of the document lies in its specific analytical conclusions, commercial assessments, and data interpretation. Redaction would remove all substantive content.

Why the Information Is Confidential

- Contains commercially sensitive strategic analysis
- Not published publicly in full
- Intended for restricted stakeholder and investigative use

2. Chinese Rebar and Wire Rod Manufacturing (2025)

Nature of the Document

An analytical report on production capacity, utilisation rates, and structural changes in Chinese long steel manufacturing.

Confidentiality Justification

- Derived from proprietary industry sources
- Contains plant-level and sector-specific insights
- Not publicly disseminated as a complete document

A non-confidential summary is not feasible without disclosing analytical findings.

3. Discovery Alert – China’s Long Steel Exports Surge 112% in Q1 2025

Nature of the Document

A specialist market alert documenting short-term export surges and trade flow anomalies.

Why the Information Is Confidential

- Proprietary alert product
- Relies on paid trade datasets and modelling
- Not publicly accessible

4. Fastmarkets – China Long Steel and Billet Export Article (2 May 2025)

Nature of the Document

A Fastmarkets subscription article containing price data, market commentary, and export analysis.

Why the Information Is Confidential

- Licensed Fastmarkets intellectual property
- Explicit contractual restrictions on redistribution
- Not available free of charge

Access is restricted to licensed subscribers; unauthorised sharing is prohibited.

5. Fastmarkets – Steel Reinforcing Bar (Rebar) Index Export

Nature of the Document

A data export containing price indices and assessments.

Reason Non-Confidential Summary Cannot Be Provided

The dataset’s value lies entirely in the numerical series. Any summary would remain derivative.

Confidentiality Basis

- Licensed price data
- Contractual prohibition on disclosure

6. Fastmarkets – Supporting Evidence: Q1 2025 Exports, China Surge

Confidentiality Justification

As above, this document contains proprietary Fastmarkets analysis and cannot be shared or summarised.

7. Market Reports – World / Global Long Steel

Nature of the Document

Commercial market reports covering global capacity, demand, pricing, and trade.

Why the Information Is Confidential

- Produced by commercial market intelligence providers
- Subscription-only
- Contains copyright-protected material

8. MEPS Developing Markets Steel Review (March 2026)

Nature of the Document

A MEPS International publication providing detailed developing-market steel analysis.

Confidentiality Basis

- Licensed MEPS content
- Redistribution prohibited under copyright
- Not publicly accessible in full

9. Production by Commodity Code (2019–2025)

Nature of the Document

A compiled dataset aggregating production data across commodity codes over multiple years.

Why the Information Is Confidential

- Compiled and structured dataset
- Combines multiple restricted sources
- Disclosure would reveal underlying licensed data

10. Reuters – Baosteel Article

Nature of the Document

A Reuters news article related to Baosteel operations and strategy.

Public Availability

- Publicly available online on the Reuters website.

Reason for Withholding the PDF

While the article is public, the PDF version is a reproduced copy. Redistribution may infringe copyright. Interested parties can access the article directly via Reuters.

11. S&P Global Commodity Insights (2025)

Confidentiality Justification

- Proprietary intelligence product
- Covered by strict licensing terms
- Not publicly available

12. Document Title: SteelOrbis – China’s Rebar Output Down 13.6% in 2024

Public Availability

- ✓ Publicly available online to registered SteelOrbis users.

Confidentiality Basis

The PDF itself is subscription material. Redistribution is restricted.

13. SteelOrbis – 110 Million Tonnes

Confidentiality Justification

As above, this is proprietary SteelOrbis content subject to licensing restrictions.

14. China Export Figures (Detailed)

Nature of the Document

A detailed, transaction-level export dataset.

Why the Information Is Confidential

- Commercially sensitive trade data
- Compiled from restricted databases
- Cannot be summarised meaningfully

15. Supporting Evidence – China Export Details (2026)

Confidentiality Basis

Same as above; dataset disclosure would reveal sensitive trade patterns.

16. Supporting Evidence – China Rebar

Confidentiality Basis

Proprietary dataset compiled for the purposes of the investigation.

17. Supporting Evidence – Rebar Imports (Non-EU, 2013–2014, Pre-Anti-Dumping Measures)

Confidentiality Justification

- Historic but commercially sensitive import data
- Compiled analytical dataset
- Not publicly released in this structured form

18. Supporting Evidence – Total Imports (Jan–Aug 2013–2014, Pre-Anti-Dumping Measures)

Confidentiality Basis

As above; summary disclosure would undermine confidentiality.

19. TD0010 HFP Rebar – Final Recommendation (28 February 2023)

Public Availability

- Partially publicly available via official government publications.

Reason for Withholding

The version provided includes annotations and supporting context not published publicly.

20. UK Steel – Monthly Statistics (March 2026)

Public Availability

- Publicly available online via UK Steel.

21. UK Steel Statistics (2024)

Public Availability

✓ Publicly available online.

22. World Steel Association – World Steel in Figures (2025)

Public Availability

✓ Publicly available online via the World Steel Association.

Conclusion

The documents listed above contain a mixture of:

- Licensed proprietary market intelligence
- Commercially sensitive datasets
- Confidential analytical material
- Copyright-protected third-party publications

Where documents are publicly available, this has been indicated, and interested parties may access them directly from the original publishers.

For all other documents, meaningful non-confidential summaries cannot be provided without disclosing protected information or breaching contractual, copyright, or confidentiality obligations.

Accordingly, these documents must be withheld from the public file, and this Statement of Reasons provides the formal justification.