

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. Document Title: Supporting Evidence – Fastmarkets Report (WR Export Mesh Grade)

Nature of the Document

This document is a Fastmarkets proprietary report containing detailed price assessments, market intelligence, and export-grade wire rod data relevant to the trade investigation.

Reason Non-Confidential Summary Cannot Be Provided

The analytical value of the report lies entirely in the exact numerical assessments, methodologies, and commercial commentary, all of which are confidential intellectual property belonging to Fastmarkets. Redaction would remove all meaningful content, and any summary would remain derivative of the protected data.

Why the Information Is Confidential

- The document is licensed material with explicit legal restrictions. The notice states: *“Access to Fastmarkets content and data is on a named-user basis... Unlicensed sharing is not permitted... copying, extracting or sharing pricing data is prohibited without an additional licence.”*
- The report is not publicly available, and 7 Steel UK only accesses it under subscription.
- Sharing the document, or any part of it, would violate Fastmarkets’ copyright and licensing terms.

Accordingly, the report must be treated as confidential.

2. Document Title: Supporting Evidence – PDFs for Anti-Dumping Wire Rod Case (CRU Reports)

Nature of the Document

These documents consist of confidential CRU analysis and market intelligence reports relevant to the anti-dumping wire rod investigation.

Reason Non-Confidential Summary Cannot Be Provided

The confidential content comprises proprietary market modelling, pricing forecasts, trade flow data, and commercial insights. A redacted or non-confidential version would necessarily disclose the structure, findings, and analytical conclusions, which themselves constitute confidential intellectual property.

Why the Information Is Confidential

The reports contain a clear confidentiality notice stating:

“This report is supplied on a private and confidential basis... Its contents must not be disclosed... nor reproduced in whole or in part without the prior written permission of CRU International.”

They are therefore:

- legally protected under **copyright**,
- restricted to licensed internal use only, and
- not available through any public source.

For these reasons, they cannot be published or summarised.

3. Document Title: Supporting Evidence – CEIC Data 2024

Nature of the Document

The CEIC dataset includes economic, industrial, and trade indicators accessed through a paid subscription platform, which requires user registration and licensing to obtain and view the data.

Reason Non-Confidential Summary Cannot Be Provided

The value of the CEIC data is contained in the specific numerical datasets, which cannot be reproduced, summarised, or reformatted without disclosing proprietary information. Any attempted summary would remain derivative of copyright-protected material.

Why the Information Is Confidential

- CEIC data is not publicly accessible; it requires a commercial licence and user agreement.
- The platform's terms of use prohibit sharing, reproduction, or redistribution of datasets.
- The information is commercially sensitive and cannot legally be posted on a public file.

Therefore, the CEIC Data 2024 extract must be withheld in full.

Conclusion

All documents listed above contain proprietary, commercially sensitive, or copyright-protected material sourced from paid subscriptions or confidential research providers. Providing non-confidential summaries is not possible without revealing restricted content or breaching licence conditions. For these reasons, 7 Steel UK requests that the documents remain off the public file, with this Statement of Reasons serving as the formal justification.