



January 29, 2021

Mr. Christopher J. Kirkpatrick
Office of the Secretariat
Commodity Futures Trading Commission
Three Lafayette Centre
1155 21st Street, NW
Washington, DC 20581

Re: ICE Clear Europe Self-Certification Pursuant to Commission Rule 40.6 –
Delivery Procedures Amendments

Dear Mr. Kirkpatrick:

ICE Clear Europe Limited (“ICE Clear Europe” or the “Clearing House”), a registered derivatives clearing organization under the Commodity Exchange Act, as amended (the “Act”), hereby submits to the Commodity Futures Trading Commission (the “Commission”), pursuant to Commission Rule 40.6 for self-certification, the amendments to the ICE Clear Europe Delivery Procedures (the “Delivery Procedures”)¹ discussed herein. The amendments are to become effective on the first business day following the tenth business day after submission, or such later date as ICE Clear Europe may determine.

Concise Explanation and Analysis

ICE Clear Europe is amending Part BB of its Delivery Procedures to clarify the delivery specifications relating to Containerised White Sugar contracts.

The proposed amendments provide that the contract relates to specified sugar of any origin of the crop or production current on the first day of the delivery period (instead of referencing the crop at the time of delivery). The change will facilitate identification of sugar eligible for delivery under the contract.

Compliance with the Act and CFTC Regulations

¹ Capitalized terms used but not defined herein have the meanings specified in the Delivery Procedures.

The rule amendments are potentially relevant to the following core principles: (C) Participant and Product Eligibility and (E) Settlement Procedures and the applicable regulations of the Commission thereunder.

- *Product Eligibility.* The amendments are intended to clarify the delivery specifications relating to Containerised White Sugar contracts to facilitate identification of sugar eligible for delivery under the contract. The terms and conditions of the contracts are not changing in any other material respect, and such contracts will continue to be cleared by ICE Clear Europe in the same manner as they are currently. As a result, ICE Clear Europe believes that the amendments are consistent with the requirements of Core Principle C and Commission Rule 39.12(b).
- *Settlement Procedures.* As set out above, the amendments clarify the delivery specification relating to Containerised White Sugar contracts. The amendments clarify the role and responsibilities of the Clearing House and Clearing Members in the physical delivery process, particularly related to the identification of eligible deliverable product. As a result, ICE Clear Europe believes the amendments are consistent with the requirements of Core Principle E and Commission Rule 39.14.

As set forth herein, the amendments consist of the amendments to the Delivery Procedures, a copy of which is attached hereto.

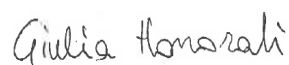
ICE Clear Europe hereby certifies that the amendments comply with the Act and the Commission's regulations thereunder.

ICE Clear Europe received no substantive opposing views in relation to the proposed amendments.

ICE Clear Europe has posted a notice of pending certification and a copy of this submission on its website concurrent with the filing of this submission.

If you or your staff should have any questions or comments or require further information regarding this submission, please do not hesitate to contact the undersigned at giulia.honorati@theice.com or +44 20 7429 7127.

Very truly yours,



Giulia Honorati

Manager, Compliance and Regulation