



June 1, 2016

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:
Amendments to Delivery Procedures for Containerised White Sugar Contracts

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 its Delivery Procedures discussed herein. The amendments are to become effective on the business day following the tenth business day after submission, or such later date as ICE Clear Europe may determine.

Concise Explanation and Analysis

The purpose of the rule amendments is to modify the ICE Clear Europe Delivery Procedures in connection with the launch by the ICE Futures Europe market of new containerised white sugar futures contracts that will be cleared by ICE Clear Europe (the “Containerised White Sugar Contracts”). ICE Clear Europe does not otherwise propose to amend its clearing rules or procedures in connection with the Containerised White Sugar Contracts.

The amendments adopt a new Part BB to the Delivery Procedures, which will apply to the Containerised White Sugar Contracts. The amendments provide, among other matters, specifications for delivery of white sugar under a Containerised White Sugar Contract, including relevant definitions and a detailed delivery timetable for the contracts. The amendments also address invoicing and payment for delivery. The revised procedures also set out various documentation requirements for the relevant

parties, and provide procedures for rejection of delivery documentation under the applicable contract terms.

Compliance with the Act and Commission Regulations

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

- *Participant and Product Eligibility.* ICE Clear Europe has established appropriate standards for determining the eligibility of contracts submitted to the clearinghouse for clearing, consistent with the requirements of Core Principle C and Commission Rule 39.12. ICE Clear Europe believes that its existing systems are appropriately scalable to handle physical delivery under the Containerised White Sugar Contracts, which is generally similar from an operational perspective to delivery under other ICE Futures Europe softs futures contracts currently cleared by ICE Clear Europe.
- *Risk Management.* ICE Clear Europe believes that it will be able to manage the risks associated with physical delivery under the Containerised White Sugar Contracts, consistent with the requirements of Core Principle D and Commission Rule 39.13. The Containerised White Sugar Contracts present a similar risk profile to other ICE Future Europe softs futures contracts currently cleared by ICE Clear Europe, and ICE Clear Europe believes that its existing risk management and margin framework is sufficient for purposes of risk management of the Containerised White Sugar Contracts and related deliveries.
- *Settlement Procedures.* The amended Delivery Procedures, together with the existing ICE Clear Europe rules and settlement procedures, provide a mechanism for physical settlement of the Containerised White Sugar Contracts. The amended Delivery Procedures, together with the Rules, establish the obligations of the Clearing House in respect of delivery and permit the clearing house to manage delivery risks with respect to such contracts. ICE Clear Europe believes that the amended Delivery Procedures are thus consistent with the requirements of Core Principle E and Commission Rule 39.14.

As described herein, the amendments consist of changes to the ICE Clear Europe Delivery Procedures. A copy of such revisions is attached hereto.

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

ICE Clear Europe has received no substantive opposing views in relation to the proposed rule 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 patrick.davis@theice.com or +44 20 7065 7738, Dee Blake, Director of Regulation, at dee.blake@theice.com or +44 20 7065 7752 or Paul Swann, President & Managing Director, at paul.swann@theice.com or +44 20 7065 7700.

Very truly yours,



Patrick Davis
Head of Legal and Company Secretary