SUBMISSION COVER SHEET							
IMPORTANT: Check box if Confidential Treatment is requested							
Registered Entity Identifier Code (optional): 16-086							
Organization: Commodity Exchange, Inc. ("COMEX")							
Filing as a:  SEF DCO SDR							
Please note - only ONE choice allowed.							
Filing Date (mm/dd/yy): 03/04/2016 Filing Description: Initial Listing of Aluminium European Premium Duty-Unpaid (Metal Bulletin) Futures on CME Globex and CME							
ClearPort							
SPECIFY FILING TYPE							
Please note only ONE choice allowed per Submission.							
Organization Rules and Rule Amendments							
Certification	§ 40.6(a)						
Approval	§ 40.5(a)						
Notification	§ 40.6(d)						
Advance Notice of SIDCO Rule Change	§ 40.10(a)						
SIDCO Emergency Rule Change	§ 40.10(h)						
Rule Numbers:							
	product per Submission.						
Certification	§ 40.2(a)						
Certification Security Futures	§ 41.23(a)						
Certification Swap Class	§ 40.2(d)						
Approval	§ 40.3(a)						
Approval Security Futures	§ 41.23(b)						
Novel Derivative Product Notification	§ 40.12(a)						
Swap Submission  Official Product Name: Aluminium European Premium Duty-Paid (	§ 39.5 (Metal Bulletin) Futures						
Product Terms and Conditions (product related Rules and I							
Certification	§ 40.6(a)						
Certification Made Available to Trade Determination	§ 40.6(a)						
Certification Security Futures	§ 41.24(a)						
Delisting (No Open Interest)	§ 40.6(a)						
Approval	§ 40.5(a)						
Approval Made Available to Trade Determination	§ 40.5(a)						
Approval Security Futures	§ 41.24(c)						
Approval Amendments to enumerated agricultural products	§ 40.4(a), § 40.5(a)						
"Non-Material Agricultural Rule Change"	§ 40.4(b) (5)						
Notification Official Name(s) of Product(s) Affected:	§ 40.6(d)						
Official Name(s) of Product(s) Affected:							
Rule Numbers:							



March 4, 2016

### **VIA ELECTRONIC PORTAL**

Mr. Christopher J. Kirkpatrick Office of the Secretariat Commodity Futures Trading Commission Three Lafayette Centre 1155 21st Street, N.W. Washington, D.C. 20581

Re: CFTC Regulation 40.2(a) Certification. Notification Regarding the Initial

Listing of the Aluminium European Premium Duty-Paid (Metal Bulletin)

**Futures Contract.** 

**COMEX Submission No. 16-086** 

Dear Mr. Kirkpatrick:

Commodity Exchange, Inc. ("COMEX" or "Exchange") is notifying the Commodity Futures Trading Commission ("CFTC" or "Commission") that it is self-certifying the initial listing of the Aluminium European Premium Duty-Paid (Metal Bulletin) Futures contract (Rulebook Chapter: 1109; Commodity Code: EDP) for trading on CME Globex and for submission for clearing through CME ClearPort, effective on Sunday, March 20, 2016 for trade date Monday, March 21, 2016.

The Contract specifications are as follows:

Contract Name	Aluminium European Premium Duty- Paid (Metal Bulletin) Futures				
Rulebook Chapter	1109				
Commodity Code	EDP				
Contract Size	25 metric tons				
First Listed Month	May 2016				
Listing Schedule (all venues)	Monthly contracts listed for the current year and the next calendar year.  Monthly contracts for a new calendar year will be added following the termination of trading in the December contract of the current year.				
Termination of Trading	Trading terminates on the day of the last index published price of the contract month.				
Business Days	Business days are based on UK public holiday calendar.				
Minimum Price Fluctuation	\$0.01				
Value per Tick	\$0.25				
Block Trade Minimum Threshold	10 contracts				
CME Globex Match Algorithm	First in first out (FIFO)				

### **Trading and Clearing Hours:**

Sunday – Friday 6:00 p.m. – 5:00 p.m. (5:00 p.m. – 4:00 p.m. Chicago Time/CT) with an hour break each day beginning at 5:00 p.m. (4:00 p.m. Chicago Time/CT).

## **Trading and Clearing Fees:**

Exchange Fees	Pit*	CME Globex	CME ClearPort	Agency Cross
Member Day Rate	\$1.95	\$1.95		
Member Overnight Rate	\$1.95	\$1.95	\$2.45	\$1.95
Cross Division Rate	\$2.45	\$2.45		
Non-Member Rate	\$2.95	\$2.95	\$3.45	\$2.95
International Incentive Program (IIP) and International Volume Incentive Program (IVIP)		\$2.45		
Asian Incentive Program (AIP), Central Bank Incentive Program (CBIP), Emerging Markets Bank Incentive Program (EMBIP), Latin American Commercial Incentive Program (LACIP), Latin American Fund Manager Incentive Program (FMIP), Latin American Proprietary Trading Incentive Program (LAPTIP) Participants		\$1.10		
Other Processing Surcharges	Member	Non- Member		
Cash Settlement	\$1.95	\$2.95		
Other Processing Surcharges	Rate			
Block Surcharge	\$0.10			
Facilitation Fee	\$0.50			
Give-up Surcharge	\$0.05			
Position Transfer/Position Adjustment	\$0.10			

<sup>\*</sup>Effective as of the close of trading on July 2, 2015, COMEX closed its futures pits for open outcry trading. Brokers will still be able to submit Block Trades, EFPs, and EFRs through Front-End Clearing System (FEC); these trades will be assessed Pit Exchange Fees in addition to any surcharges.

The Exchange is also notifying the CFTC that it is self-certifying the insertion of the terms and conditions for the Contract into the Position Limit, Position Accountability and Reportable Level Table and Header Notes located in the Interpretations and Special Notices Section of Chapter 5 of the COMEX Rulebook in relation to the listing of the Contract. The terms and conditions establish the all month/any one month accountability levels, expiration month position limit, reportable level and aggregation allocation for the Contract (See Appendix B, attached under separate cover).

COMEX is self-certifying block trading on this Contract with a minimum block threshold of 10 contracts. This block level aligns with the comparable base metals contracts listed on the Exchange.

The Exchange reviewed the designated contract market core principles ("Core Principles") as set forth in the Commodity Exchange Act ("Act" or "CEA") and identified that the listing of the Aluminium European Premium Duty-Unpaid (Metal Bulletin) Futures contract may have some bearing on the following Core Principles:

- <u>Prevention of Market Disruption</u>: Trading in this Contract will be subject to the COMEX rules ("Rulebook"), Chapters 4 and 7 which include prohibitions on manipulation, price distortion and disruptions of the delivery or cash-settlement process. As with all products listed for trading on one of CME Group's designated contract markets, activity in the new product will be subject to extensive monitoring and surveillance by CME Group's Market Regulation Department.
- Compliance with Rules: Trading in this Contract will be subject to the rules in Rulebook Chapter 4 which includes prohibitions against fraudulent, noncompetitive, unfair and abusive practices. Additionally, trading in this Contract will also be subject to the full panoply of trade practice rules, the majority of which are contained in Chapter 5 of the Rulebook. As with all products listed for trading on one of CME Group's designated contract markets, activity in this new product will be subject to extensive monitoring and surveillance by CME Group's Market Regulation Department. The Market Regulation Department has the authority to exercise its investigatory and enforcement power where potential rule violations are identified.
- <u>Position Limitations or Accountability</u>: The spot month speculative position limits for the Contract is set to 1,000 contracts representative of 14.2% of deliverable supply.
- <u>Financial Integrity of Contracts</u>: All contracts traded on the Exchange will be cleared by the Clearing House of the Chicago Mercantile Exchange Inc. which is a registered derivatives clearing organization with the Commission and is subject to all Commission regulations related thereto.
- <u>Execution of Transactions</u>: The Contract will be listed for trading on CME Globex. The CME Globex platform provides a transparent, open, and efficient mechanism to electronically execute trades on screen.
- <u>Trade Information</u>: All required trade information is included in the audit trail and is sufficient for the Market Regulation Department to monitor for market abuse.
- <u>Protection of Market Participants</u>: Rulebook Chapters 4 and 5 contain multiple prohibitions
  precluding intermediaries from disadvantaging their customers. These rules apply to trading on all
  of the Exchange's competitive trading venues and will be applicable to transactions in this
  product.
- <u>Disciplinary Procedures</u>: Chapter 4 of the Rulebook contains provisions that allow the Exchange
  to discipline, suspend or expel members or market participants that violate the Rulebook. Trading
  in this contract will be subject to Chapter 4, and the Market Regulation Department has the
  authority to exercise its enforcement power in the event rule violations in this product are
  identified.

- <u>Dispute Resolution</u>: Disputes with respect to trading in this contract will be subject to the arbitration provisions set forth in Chapter 6 of the Rulebook. Chapter 6 allows all nonmembers to submit a claim for financial losses resulting from transactions on the Exchange to arbitration. A member named as a respondent in a claim submitted by a nonmember is required to participate in the arbitration pursuant to Chapter 6. Additionally, the Exchange requires that members resolve all disputes concerning transactions on the Exchange via arbitration.
- Availability of General Information: COMEX will issue a Special Executive Report ("SER") to the
  marketplace regarding these amendments. The SER will also be posted on the CME Group
  website.
- <u>Daily Publication of Trading Information</u>: COMEX will continue to comply with this Core Principle
  by making public daily information on settlement prices, volume, open interest, and opening and
  closing ranges for the contract. This will be accomplished by publishing this information on a daily
  basis on the Exchange's website.

Pursuant to Section 5c(c) of the Act and CFTC Regulation 40.2(a), the Exchange hereby certifies that the Contract complies with the Act, including regulations under the Act. There were no substantive opposing views to the listing of the Contract.

The Exchange certifies that this submission has been concurrently posted on the Exchange's website at <a href="http://www.cmegroup.com/market-regulation/rule-filings.html">http://www.cmegroup.com/market-regulation/rule-filings.html</a>.

Should you have any questions concerning the above, please contact the undersigned at (212) 299-2200 or via e-mail at CMEGSubmissionInquiry@cmegroup.com.

Sincerely,

/s/Christopher Bowen
Managing Director and Chief Regulatory Counsel

Attachments: Appendix A: COMEX Rulebook Chapter

Appendix B: Position Limit, Position Accountability, and Reportable Level Table in

Chapter 5 of the COMEX Rulebook (attached under separate cover)

Appendix C: COMEX Rule 588.H. – ("Globex Non-Reviewable Trading Ranges")

Appendix D: Cash Market Overview and Analysis of Deliverable Supply

## **Appendix A**

### COMEX Rulebook

### Chapter 1109

### Aluminium European Premium Duty-Paid (Metal Bulletin) Futures

#### 1109100. SCOPE OF CHAPTER

The provisions of these rules shall apply to all contracts bought or sold on the Exchange for cash settlement based on the Floating Price. The procedures for trading, clearing and cash settlement of this contract, and any other matters not specifically covered herein shall be governed by the general rules of the Exchange.

#### 1109101. CONTRACT SPECIFICATIONS

The Floating Price for each contract month shall be equal to the arithmetic average calculated to two decimal places of each twice weekly mid-point of the Metal Bulletin Aluminium P1020A, inwarehouse Rotterdam duty-paid, spot low-high, \$/tonne for each day during the contract month published by Metal Bulletin.

### 1109102. TRADING SPECIFICATIONS

The number of months open for trading at a given time shall be determined by the Exchange.

#### 1109102.A. Trading Schedule

The hours of trading for this contract shall be determined by the Exchange.

### 1109102.B. Trading Unit

The contract unit shall be twenty five (25) metric tons.

### 1109102.C. Price Increments

Prices shall be quoted in multiples of cents (\$0.01) per metric ton. Price shall be quoted in dollars and cents per metric tons.

### 1109102.D. Position Limits, Exemptions, Position Accountability and Reportable Levels

The applicable position limits and/or accountability levels, in addition to the reportable levels, are set forth in the Position Limit, Position Accountability and Reportable Level Table in the Interpretations & Special Notices Section of Chapter 5.

A Person seeking an exemption from position limits for bona fide commercial purposes shall apply to the Market Regulation Department on forms provided by the Exchange, and the Market Regulation Department may grant qualified exemptions in its sole discretion.

Refer to Rule 559 for requirements concerning the aggregation of positions and allowable exemptions from the specified position limits.

### 1109102.E. Termination of Trading

Trading shall cease on the day of the last index published price of the contract month.

### 108103. FINAL SETTLEMENT

Final settlement under the contract shall be by cash settlement. Final settlement, following termination of trading for a contract month, will be based on the Floating Price. The final settlement price will be the Floating Price calculated for each contract month.

### 108104. DISCLAIMER

NEITHER CME GROUP INC., COMMODITY EXCHANGE, INC. NOR ANY OF THEIR AFFILIATES (COLLECTIVELY "CME") NOR METAL BULLETIN GUARANTEES THE ACCURACY AND/OR COMPLETENESS OF THE INDEX OR ANY OF THE DATA INCLUDED THEREIN. NEITHER CME NOR METAL BULLETIN MAKE ANY WARRANTIES, EXPRESS OR IMPLIED, AS TO THE RESULTS TO BE OBTAINED BY ANY PERSON OR ENTITY FROM USE OF THE

INDEX, TRADING BASED ON THE INDEX, OR ANY DATA INCLUDED THEREIN IN CONNECTION WITH THE TRADING OF THE CONTRACTS, OR, FOR ANY OTHER USE. NEITHER CME NOR METAL BULLETIN MAKE ANY WARRANTIES, EXPRESS OR IMPLIED, AND EACH HEREBY DISCLAIMS ALL WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR USE WITH RESPECT TO THE INDEX OR ANY DATA INCLUDED THEREIN. WITHOUT LIMITING ANY OF THE FOREGOING, IN NO EVENT SHALL CME OR METAL BULLETIN HAVE ANY LIABILITY FOR ANY LOST PROFITS OR INDIRECT, PUNITIVE, SPECIAL OR CONSEQUENTIAL DAMAGES (INCLUDING LOST PROFITS), EVEN IF NOTIFIED OF THE POSSIBILITY OF SUCH DAMAGES.

# **APPENDIX B**

# **COMEX Rulebook Chapter 5 Position Limit Table**

(Attached under separate cover)

# **APPENDIX C**

# **COMEX Rule 588.H. ("Globex Non-Reviewable Trading Ranges")**

(additions are <u>underscored</u>)

Instrument	Non-Reviewable Range (NRR) in Globex format	NRR including Unit of Measure	NRR Ticks
Aluminium European Premium Duty-Paid (Metal Bulletin) Futures	<u>250</u>	\$2.50 per metric ton	<u>250</u>

### APPENDIX D

## **Cash Market Overview and Analysis of Deliverable Supply**

### Introduction

Exchange staff conducted a review of the underlying cash market of primary high grade aluminium (99.7% Al purity ingot) production and imports in Northwest Europe to determine the deliverable supply for Aluminium European Premium Duty-Paid (Metal Bulletin) Futures (commodity code: EDP).

In its analysis of deliverable supply, the Exchange has determined to include both production and import data as the basis for the contract reflects duty-paid material. Aluminium produced in Europe is by definition duty paid. For duty unpaid imports, once material is customs cleared and the duty paid, it is readily available within 1-2 days. The delivery point for the contract is basis Rotterdam, but reflects aluminium prices for the broader Northwest European market. Therefore, the Exchange has determined deliverable supply as imports into Belgium, France, Germany and the Netherlands. The data for France has been reduced by 50% to reflect the fact that only around half of French imports are available in Northwest European ports with the remainder as volume into the Mediterranean, which has been excluded. The freely accessible data available for aluminium production for West Europe is defined as France, Germany, Greece, Iceland, Italy, Norway, Spain, Sweden, and United Kingdom but not disaggregated by country. The Exchange, from discussions with the wider market has determined to apply a 30% haircut to the West Europe production figures to provide conservative Northwest Europe aluminium production figures.

Primary aluminium is cast into a number of shapes including slab, billet, bloom and ingot. Market sources including a number of producers, metals consultancies and analysts suggested a range of 13.5% to 20% of European primary aluminium production is cast into ingot form, which is the basis for this assessment. Therefore, the Exchange has determined to apply an 86.5% haircut to the primary aluminium production figures for Northwest Europe.

The Exchange is excluding LME stocks in its analysis of deliverable supply as such material is duty-unpaid whilst in warehouse and is often held at private warehouses where details are undisclosed. However, once a warrant is cancelled and the duty is paid, such material is eligible to be included in deliverable supply.

Based on this, we believe that our analysis of deliverable supply is conservative since theoretically some of the LME warranted material could be delivered from the warehouse (and would become duty paid at this point). For reference, LME on warrant stock for Northwest Europe is currently 1.36 million metric tonnes as of February 17<sup>th</sup>, 2016<sup>1</sup>.

### **Data Sources**

### **Aluminium Institute**

The Exchange based its analysis of deliverable supply of primary high grade aluminium production portion in Northwest Europe on data provided by the International Aluminium Institute<sup>2</sup>. The International Aluminium Institute, which was founded in 1972 (as the International Primary Aluminium Institute), provides free access to aluminium production figures. It is an industry body whose membership represents over 60% of global bauxite, alumina and aluminium production.

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<sup>&</sup>lt;sup>1</sup>Bloomberg Code: LMEI

<sup>&</sup>lt;sup>2</sup> http://www.world-aluminium.org/

### **United Nations Comtrade database**

The Exchange based its analysis of deliverable supply of primary high grade aluminium imports portion in Northwest Europe on data provided by the United Nations Comtrade Database<sup>3</sup>.

The UN Comtrade Database provides free access to detailed global trade data. UN Comtrade is a repository of official trade statistics and relevant analytical tables. It contains annual trade statistics starting from 1962 and monthly trade statistics since 2010. The UN Comtrade data has been used for Northwest Europe imports of primary aluminium which is the underlying product of the Metal Bulletin assessment and the proposed futures contract.

The Exchange has based its analysis of import deliverable supply on UN Comtrade data for only unwrought aluminium, not alloyed aluminium, using tariff code 760110<sup>4,5</sup> because the assessment measures primary aluminium. Unwrought aluminium is the same as primary aluminium meaning it is unworked in the metallurgical definition. Aluminium in the form of bars, rods and profiles have been excluded because the assessment measures ingots. Aluminium alloy imports have been excluded because it includes elements such as copper, magnesium, manganese, silicon, tin and zinc and is a separate tradable market and excluded in the assessment.

### **Metal Bulletin**

Since 1913, Metal Bulletin has provided information and insights that help customers make sound trading and business decisions and enable the markets to perform with greater transparency and efficiency. Metal Bulletin's price specification and assessment methodologies for primary aluminium ingot to meet London Metal Exchange<sup>6</sup> (LME) specification P1020A is available on Metal Bulletin's website<sup>7</sup>.

The final settlement price for each of Aluminium European Premium Duty-Paid (Metal Bulletin) Futures (commodity code: EDP) is based on the assessment of the premium paid, for spot transactions above the daily LME official cash settlement price for aluminium as published by Metal Bulletin. The assessment is named "Aluminium P1020A, in-warehouse Rotterdam duty-paid, spot \$/tonne", and is published on Wednesday and Friday between 2pm and 3pm London time by Metal Bulletin.

<sup>&</sup>lt;sup>3</sup>http://comtrade.un.org/data/

<sup>&</sup>lt;sup>4</sup> http://www.hscode.org/m/bbs/board.php?bo table=ch76&wr id=1

<sup>&</sup>lt;sup>5</sup> https://www.gov.uk/trade-tariff/headings/7601

<sup>&</sup>lt;sup>6</sup>https://www.lme.com/ The London Metal Exchange is the world's largest futures exchange for base metals. Aluminium has been trading since 1978. As the market of last resort the aluminium is physically deliverable into approved warehouses. Stocks are held on warrant or off warrant at LME warehouses and non LME approved warehouses.

<sup>&</sup>lt;sup>7</sup>http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=0CCEQFjAAahUKEwjb8aji 34DHAhWBkA0KHQ47CT4&url=http%3A%2F%2Fwww.metalbulletin.com%2FAssets%2Fpdf%2FMB%2 520PRICE%2520SPECIFICATIONS%2FPrice%2520Specifications\_Finished\_Version.pdf&ei=pP24VduP KoGhNo72pPAD&usg=AFQiCNEO0G8H-XMEP\_GGSXEFsQME9FM79w

### Northwest Europe (NWE) Primary Aluminium Market

### **Cash Market Overview**

The market for European aluminium remains volatile with premiums both strengthening and weakening over time against the LME aluminium cash (spot) markets. This has been most notable in the key markets outside of China. Since October 2014, the premium for European Aluminium in-warehouse Rotterdam on a duty paid basis has fallen from \$510 per metric to \$140 per metric ton (this represents a premium of around 9% to the LME aluminium official cash settlement price).

The Exchange has taken the last full 3 corresponding years (January 2012 to December 2014) of data available for both imports and production for the period 2012-2014 as UN Comtrade data for 2015 is not yet available. Production data (from International Aluminium Institute) is available for 2015 but we have excluded this due to the lack of the import data for the corresponding timeframe. By way of reference, the 2015 West Europe aluminium production figures were 4% higher than the average for the period 2012-2014 3.745 million metric tonnes.

Based on data provided by UN Comtrade data for imports and International Aluminium Institute for production in the most recent 3 corresponding full calendar years, primary aluminium **imports** and **production** for Northwest Europe averaged around **3.853 million** metric tonnes per annum over the three year period 2012-2014 (see Table 1).

### **Analysis of Deliverable Supply**

In its November 18, 2011, final position limit rulemaking, the Commission defined deliverable supply as "the quantity of the commodity meeting a derivative contract's delivery specifications that can reasonably be expected to be readily available to short traders and saleable by long traders at its market value in normal cash marketing channels at the derivative contract's delivery points during the specified delivery period, barring abnormal movement in interstate commerce."

The International Aluminium Institute data for West Europe aluminium production is defined as France, Germany, Greece, Iceland, Italy, Norway, Spain, Sweden, and United Kingdom. The Exchange has determined, in consultation with market participants to apply a 30% haircut to the West Europe production figures to provide conservative Northwest Europe aluminium production figures.

Northwest Europe = 70% West Europe

Based on market sources including a number of producers, analysts and metals consultancies, casting of ingots from primary aluminium production being 13.5% compared with other shapes of slab, billet and bloom cast in Europe.

Ingot = 13.5% primary aluminium production North West Europe

UN Comtrade data reported for France is for the whole of France and is not broken down into activity in Northern France versus activity in the French Mediterranean region. The Exchange determined, in consultation with market participants, that a conservative accounting of activity located in Northern France shall be to only account for 50% of total activity in France to be included in calculating deliverable supply.

Northwest Europe = Belgium + 50% France + Germany + Netherlands

<sup>&</sup>lt;sup>8</sup> 17 CFR 1,150-51 (2011), <a href="http://www.cftc.gov/ucm/groups/public/@lrfederalregister/documents/file/2011-28809a.pdf">http://www.cftc.gov/ucm/groups/public/@lrfederalregister/documents/file/2011-28809a.pdf</a>

Duty unpaid ingots for the Rotterdam terminal market can imported and customs cleared into Europe or they can shipped to another location if the market dynamics permit i.e. if a sufficiently high premium can be achieved in another geographical market. To account for this optionality, the Exchange has determined to apply a 50% haircut on the import figures.

Northwest Europe import total = 50% France + Germany + Netherlands

In its analysis of deliverable supply, the Exchange has determined to include both production and import data as the basis for the contract reflects duty-paid which is, therefore, applicable to domestically produced aluminium and imported material being readily available with 1-2 days.

		metric tonnes (mt)											
	Production				Import								
				**Ingot NWE				50%			***NWE	****NWE	*****Import
Year		West Europe	*NWE Total	Total		Belgium	France	France	Germany	Netherlands	Import	Import Total	+ Production
	2012	3,605,000	2,523,500	340,672.5		788,313	268,618	134,309	1,488,958	975,278	3,386,858	1,693,429	2,034,101
	2013	3,616,000	2,531,200	341,712.0		773,513	294,038	147,019	1,535,291	326,054	2,781,876	1,390,938	1,732,650
	2014	3,596,000	2,517,200	339,822.0		642,030	354,601	177,301	1,760,827	1,867,794	4,447,951	2,223,976	2,563,798
3 year average							2,110,183						

Table 1. Northwest Europe Primary Aluminium Production and Imports

Source: UN Comtrade Database<sup>9</sup> and International Aluminium Institute<sup>10</sup>. See Appendix 1 and 2 for complete data and tables.

Based on the above analysis, it is estimated that the deliverable supply for the Aluminium European Premium Duty-Paid (Metal Bulletin) Futures is **2.110 million metric tonnes** based on the most recent three year average from 2012 to 2014 which equates to 7,034 contract equivalents per month based on a contract size of 25 metric tonnes per lot. Therefore, the spot month position limit for the Aluminium European Premium Duty-Paid (Metal Bulletin) Futures contract of 1,000 contracts reflects 14.2% of the estimated deliverable supply. The spot month limit remains below the 25% of deliverable supply threshold.

-

<sup>\*</sup>NWE Total = 70% West Europe

<sup>\*\*</sup>Ingot NWE Total = 13.5% NWE Total

<sup>\*\*\*</sup>NWE Import = Belgium + 50% France + Germany + Netherlands

<sup>\*\*\*\*</sup>NWE Import Total = 50% NWE Import

<sup>\*\*\*\*\*</sup>Import + Production = Ingot NWE Total + NWE Import Total

<sup>&</sup>lt;sup>9</sup>http://comtrade.un.org/data/

<sup>10</sup> http://www.world-aluminium.org/

# Appendix 1

# **Northwest Europe Import Primary Aluminium**

(Yearly Totals in Metric Tonnes)

Source: UN Comtrade<sup>11</sup>

2012							
Commodity	Commodity	Belgium	France	Germany	Netherlands	United Kingdc El	U-28
Unwrought aluminium. // -Aluminium, not alloyed	760110	788,313	268,618				4,617,989
Unwrought aluminium. // -Aluminium alloys	760120	320,351	554,656	3,412,965	929,852	126,910	4,702,288
Aluminium bars, rods and profiles. // -Of aluminium, not alloyed	760410	15,213	30,288	52,061	68,249	46,949	84,899
Aluminium bars, rods and profiles. // - Of aluminium alloys : // Hollow profiles	760421	41,848	76,300	227,059	21,415	26,188	99,189
Aluminium bars, rods and profiles. // - Of aluminium alloys : // Other	760429	171,380	310,276	697,457	115,118	166,016	496,733
2013							
Commodity	Commodity	Belgium	France	Germany	Netherlands	United Kingdc El	U-28
Unwrought aluminium. // -Aluminium, not alloyed	760110	773,513	294,038	1,535,291	326,054	289,231	4,824,906
Unwrought aluminium. // -Aluminium alloys	760120	377,178	652,945	3,500,415	889,984	141,439	4,874,461
Aluminium bars, rods and profiles. // -Of aluminium, not alloyed	760410	11,725	31,316	39,612	53,065	27,054	51,411
Aluminium bars, rods and profiles. // - Of aluminium alloys : // Hollow profiles	760421	36,814	75,535	228,650	20,925	29,789	98,243
Aluminium bars, rods and profiles. // - Of aluminium alloys : // Other	760429	194,543	320,881	643,799	126,687	187,632	455,217
2014							
Commodity	Commodity	Belgium	France	Germany	Netherlands	United Kingdom	ı
Unwrought aluminium. // -Aluminium, not alloyed	760110	642,030	354,601	1,760,827	1,867,794	309,884	
Unwrought aluminium. // -Aluminium alloys	760120	292,299	769,905	3,636,092	955,204	125,099	
Aluminium bars, rods and profiles. // -Of aluminium, not alloyed	760410	13,276	32,872	34,152	35,329	35,572	
Aluminium bars, rods and profiles. // - Of aluminium alloys : // Hollow profiles	760421	43,801	78,368	226,301	33,888	31,588	
Aluminium bars, rods and profiles. // - Of aluminium alloys : // Other	760429	181,964	312,856	685,807	146,103	218,801	

<sup>11</sup> http://comtrade.un.org/data/

## Appendix 2

# **West Europe Production Primary Aluminium**

(Monthly Totals in Thousand Metric Tonnes)

Source: International Aluminium Institute<sup>12</sup>

Cource. II	IIICI	national Ai	ullillialli ilik
Start Date		d Date	West Europe
01-Jan		01-Feb-	
01-Feb	-12	01-Mar-	12 295
01-Mar	-12	01-Apr-1	12 314
01-Apr	-12	01-May-	
01-May	-12	01-Jun-1	12 309
01-Jun	-12	01-Jul-1	12 297
01-Jul	-12	01-Aug-1	12 304
01-Aug	r-12	01-Sep-	12 304
01-Sep	-12	01-Oct-1	12 290
01-Oct	-12	01-Nov-	12 296
01-Nov	-12	01-Dec-	12 288
01-Dec	-12	01-Jan-1	13 297
01-Jan	-13	01-Feb-	13 299
01-Feb	-13	01-Mar-	13 273
01-Mar	-13	01-Apr-1	13 306
01-Apr	-13	01-May-	13 298
01-May	-13	01-Jun-1	13 306
01-Jun	-13	01-Jul-	13 298
01-Jul	-13	01-Aug-1	13 309
01-Aug	ı-13	01-Sep-	13 311
01-Sep	-13	01-Oct-1	13 300
01-Oct	:-13	01-Nov-	13 310
01-Nov	-13	01-Dec-	13 302
01-Dec	-13	01-Jan-1	14 304
01-Jan	-14	01-Feb-	14 296
01-Feb	-14	01-Mar-1	14 275
01-Mar	-14	01-Apr-1	14 302
01-Apr	-14	01-May-	14 290
01-May	-14	01-Jun-1	
01-Jun		01-Jul-1	14 297
01-Jul	-14	01-Aug-1	
01-Aug		01-Sep-	
01-Sep		01-□ct-1	
01-Oct		01-Nov-	
01-Nov		01-Dec-	
01-Dec		01-Jan-1	
01-Jan		01-Feb-	
01-Feb		01-Mar-	
01-Mar	-15	01-Apr-1	15 316
01-Apr	-15	01-May-	15 307
01-May	r-15	01-Jun-1	15 318
01-Jun	n-15	01-Jul-1	15 310
01-Jul	I-15	01-Aug-1	15 317
01-Au <u>c</u>	g-15	01-Sep-1	15 316
01-Sep	-15	01-⊜ct-1	15 308
01-Oct	t-15	01-Nov-	15 317
01-Nov	r-15	01-Dec-	15 313
01-Dec	:-15	01-Jan-1	16 321

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