

SUBMISSION COVER SHEET

IMPORTANT: Check box if Confidential Treatment is requested

Registered Entity Identifier Code (optional): 24-231 (1 of 2)

Organization: The Board of Trade of the City of Chicago, Inc. ("CBOT")

Filing as a: DCM SEF DCO SDR

Please note - only ONE choice allowed.

Filing Date (mm/dd/yy): 09/18/24 Filing Description: Initial Listing of the Chicago Wheat – European Milling Wheat Spread Futures and KC HRW Wheat – European Milling Wheat Spread Futures Contracts

SPECIFY FILING TYPE

Please note only ONE choice allowed per Submission.

Organization Rules and Rule Amendments

- | | | |
|--------------------------|-------------------------------------|------------|
| <input type="checkbox"/> | Certification | § 40.6(a) |
| <input type="checkbox"/> | Approval | § 40.5(a) |
| <input type="checkbox"/> | Notification | § 40.6(d) |
| <input type="checkbox"/> | Advance Notice of SIDCO Rule Change | § 40.10(a) |
| <input type="checkbox"/> | SIDCO Emergency Rule Change | § 40.10(h) |

Rule Numbers:

New Product

Please note only ONE product per Submission.

- | | | |
|-------------------------------------|---------------------------------------|------------|
| <input checked="" type="checkbox"/> | Certification | § 40.2(a) |
| <input type="checkbox"/> | Certification Security Futures | § 41.23(a) |
| <input type="checkbox"/> | Certification Swap Class | § 40.2(d) |
| <input type="checkbox"/> | Approval | § 40.3(a) |
| <input type="checkbox"/> | Approval Security Futures | § 41.23(b) |
| <input type="checkbox"/> | Novel Derivative Product Notification | § 40.12(a) |
| <input type="checkbox"/> | Swap Submission | § 39.5 |

Official Product Name: See filing.

Product Terms and Conditions (product related Rules and Rule Amendments)

- | | | |
|--------------------------|---|----------------------|
| <input type="checkbox"/> | Certification | § 40.6(a) |
| <input type="checkbox"/> | Certification Made Available to Trade Determination | § 40.6(a) |
| <input type="checkbox"/> | Certification Security Futures | § 41.24(a) |
| <input type="checkbox"/> | Delisting (No Open Interest) | § 40.6(a) |
| <input type="checkbox"/> | Approval | § 40.5(a) |
| <input type="checkbox"/> | Approval Made Available to Trade Determination | § 40.5(a) |
| <input type="checkbox"/> | Approval Security Futures | § 41.24(c) |
| <input type="checkbox"/> | Approval Amendments to enumerated agricultural products | § 40.4(a), § 40.5(a) |
| <input type="checkbox"/> | “Non-Material Agricultural Rule Change” | § 40.4(b)(5) |
| <input type="checkbox"/> | Notification | § 40.6(d) |

Official Name(s) of Product(s) Affected:

Rule Numbers:

September 18, 2024

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. Initial Listing of the Chicago Wheat – European Milling Wheat Spread Futures and KC HRW Wheat – European Milling Wheat Spread Futures Contracts.
 CBOT Submission No. 24-231 (1 of 2)**

Dear Mr. Kirkpatrick:

The Board of Trade of the City of Chicago, Inc. (“CBOT” or “Exchange”) is certifying to the Commodity Futures Trading Commission (“CFTC” or “Commission”) the initial listing of the Chicago Wheat – European Milling Wheat Spread Futures and KC HRW Wheat – European Milling Wheat Spread Futures contracts (the “Contracts”) for trading on the CME Globex electronic trading platform (“CME Globex”) and for submission for clearing via CME ClearPort effective Sunday, October 13, 2024 for trade date Monday, October 14, 2024.

Contract Title	Chicago Wheat – European Milling Wheat Spread Futures	KC HRW Wheat – European Milling Wheat Spread Futures
Commodity Code	CWD	KWD
Trading Unit	50 metric tons	
Price Quotation	U.S. dollars and cents per metric ton	
Minimum Price Fluctuation	\$0.25 per metric ton (\$12.50 per contract)	
Listing Schedule	Five contract months in the March, May, September, and December cycle	
Initial Listing	December 2024, March 2025, May 2025, September 2025, and December 2025	
Settlement Method	Financially Settled	

Final Settlement	European Milling Wheat Futures relevant contract month settlement price converted to U.S. dollars using the mid-rate of the WM/Refinitiv 6:30 p.m. Central European Time Intraday Spot Rate for EUR/USD minus the relevant contract month Chicago Wheat daily marker converted into metric tons on the last trading day for the contract, rounded to the nearest 1 cent.	European Milling Wheat Futures relevant contract month settlement price converted to U.S. dollars using the mid-rate of the WM/Refinitiv 6:30 p.m. Central European Time Intraday Spot Rate for EUR/USD minus the relevant contract month KC HRW Wheat daily marker converted into metric tons on the last trading day for the contract, rounded to the nearest 1 cent.
Termination of Trading	Trading ends at 6:30 p.m. Central European Time (“CET”) on the 15 th calendar day of the month preceding the contract month. If that is not a business day for both the Exchange and Euronext Paris S.A., the last trading day will be the first business day following the 15 th calendar day.	
Daily Settlement	VWAP of trades in the spread contract, settled at 6:30 p.m. Central European Time	
Trading Hours and Clearing Hours	<p>CME Globex Pre-Open: Sunday: 4:00 p.m. – 7:00 p.m. CT Monday – Thursday: 4:45 p.m. – 7:00 p.m. CT and Monday – Friday: 8:00 a.m. – 8:30 a.m. CT</p> <p>CME Globex: Sunday - Friday, 7:00 p.m. - 7:45 a.m. CT and Monday - Friday, 8:30 a.m. - 1:20 p.m. CT</p> <p>CME ClearPort: Sunday 5:00 p.m. – Friday 5:45 p.m. CT with no reporting Monday – Thursday from 5:45 p.m. – 6:00 p.m. CT</p>	
Block Trade Minimum Quantity and Reporting Window	5 contracts subject to a 15-minute reporting window.	

CBOT will concurrently commence publishing daily markers for the Chicago Wheat and KC HRW Wheat which will represent transactions for each product during 6:20 p.m. to 6:30 p.m. Central European Time (CET). These markers align with the settlement time of Euronext’s European Milling Wheat Futures contract.

Exhibit A below provides CBOT Rulebook Chapters 14I and 14J. Exhibit B, under separate cover, provides the Position Limit, Position Accountability and Reportable Level Table. Exhibit C below provides the Exchange fees. Exhibit D below provides the CBOT Rule 588.H. (“Globex Non-Reviewable Trading Ranges”) Table. Exhibit E below provides the CBOT Rule 589. Special Price Fluctuations and Daily Price Limits Table. Exhibit F below provides the Cash Market Overview and Deliverable Supply Analysis. Exhibit G below provides the Settlement Procedure Documents.

The Exchange reviewed the designated contract market core principles (“Core Principles”) as set forth in the Commodity Exchange Act (“CEA”) and identified that the Contracts may have some bearing on the following Core Principles:

- **Compliance with Rules:** Trading in the Contracts will be subject to the rules in CBOT Rulebook Chapter 4 which includes prohibitions against fraudulent, noncompetitive, unfair, and abusive practices. Additionally, trading in the Contracts will also be subject to the full range of trade practice rules, the majority of which are contained in Chapter 5 and Chapter 8 of the Rulebook. As with all products listed for trading on one of CME Group’s designated contract markets, activity in these products 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.
- **Contracts not Readily Subject to Manipulation:** The Contracts are not readily subject to manipulation because of their structural attributes, underlying market, and reliance on liquid futures contracts for settlement. The Contracts financially settle to a calculation that includes a large number of trades during 10-minute windows on the CBOT and Euronext Paris, S.A.
- **Prevention of Market Disruption:** Trading in the Contracts will be subject to Rules of CBOT, which include prohibitions on manipulation, price distortion and disruption to the cash settlement process. As with any new product listed for trading on a CME Group designated contract market, trading activity in the Contracts proposed herein will be subject to monitoring and surveillance by CME Group’s Market Regulation Department.
- **Position Limitations or Accountability:** The speculative position limits for the Contracts as demonstrated in this submission are consistent with the Commission’s guidance.
- **Availability of General Information:** The Exchange will publish on its website information regarding the Contracts specifications, terms, and conditions, as well as daily trading volume, open interest, and price information.
- **Daily Publication of Trading Information:** The Exchange will publish the trading volumes, open interest levels, and price information daily on its website and through quote vendors for the Contracts.
- **Execution of Transactions:** The Contracts will be listed for trading on the CME Globex electronic trading and for clearing through the CME ClearPort. The CME Globex trading venue provides for competitive and open execution of transactions. CME Globex affords the benefits of reliability and global connectivity.
- **Trade Information:** All requisite trade information for the Contracts will be included in the audit trail and is sufficient for the Market Regulation Department to monitor for market abuse.
- **Financial Integrity of Transactions:** The Contracts will be cleared by the CME Clearing House, a derivatives clearing organization registered with the CFTC and subject to all CFTC regulations related thereto.
- **Protection of Market Participants:** CBOT Rulebook Chapters 4 and 5 set forth multiple prohibitions that preclude intermediaries from disadvantaging their customers. These rules apply to trading in all of the Exchange’s competitive trading venues and will be applicable to transaction in the Contracts.
- **Disciplinary Procedures:** 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 the Contracts 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 the product are identified.

- **Dispute Resolution:** Disputes with respect to trading in the Contracts will be subject to the arbitration provisions set forth in Chapter 6 of the Rulebook. Chapter 6 allows all non-members 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 non-member 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.

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

The Exchange certifies that this submission has been concurrently posted on the CME Group website at <http://www.cmegroup.com/market-regulation/rule-filings.html>.

Should you have any questions concerning the above, please contact the undersigned at (312) 466-7478 or via e-mail at CMEGSubmissionInquiry@cmegroup.com.

Sincerely,

/s/ Timothy Elliott
Managing Director and Chief Regulatory Counsel

Attachments: Exhibit A: CBOT Rulebook Chapters 14I and 14J
Exhibit B: Position Limit, Position Accountability, and Reportable Level Table in Chapter 5 of the CBOT Rulebook (attached under separate cover)
Exhibit C: Exchange Fees
Exhibit D: CBOT Rule 588.H. – (“Globex Non-Reviewable Trading Ranges”) Table
Exhibit E: CBOT Rule 589. – Special Price Limits and Daily Price Limits Table
Exhibit F: Cash Market Overview and Analysis of Deliverable Supply
Exhibit G: Settlement Procedure Documents

EXHIBIT A

CBOT Rulebook

Chapter 14I

Chicago Wheat - European Milling Wheat Spread Futures

14I00. SCOPE OF CHAPTER

This chapter is limited in application to the Chicago Wheat – European Milling Wheat Spread Futures contract. The provisions of these rules shall apply to all futures 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.

For purposes of this chapter, unless otherwise specified, times referred to herein shall refer to and indicate Central European Time (CET).

14I01. CONTRACT SPECIFICATIONS

The Floating Price for each contract month will be equal to the Euronext Paris S.A. European Milling Wheat Futures relevant contract month settlement price converted to U.S. dollars using the mid-rate of the WM/Refinitiv 6:30 p.m. Central European Time Intraday Spot Rate for EUR/USD minus the relevant contract month Chicago Wheat daily marker (as described in the Settlement Procedure Document) converted into metric tons on the last trading day for the contract, rounded to the nearest 1 cent.

For example, the May expiry of the Chicago Wheat – European Milling Wheat Spread Futures contract will be settled by subtracting the Chicago Wheat daily marker's May price converted into metric tons from the European Milling Wheat Futures May settlement price converted into U.S. dollars using the mid-rate of the WM/Refinitiv 6:30 p.m. Central European Time (CET) Intraday Spot Rate for EUR/USD, rounded to the nearest 1 cent.

14I02. TRADING SPECIFICATIONS

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

14I02.A. Trading Schedule

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

14I02.B. Trading Unit

The contract quantity shall be 50 metric tons. Each contract shall be valued as the contract quantity (50) multiplied by the settlement price.

14I02.C. Price Increments

Prices shall be quoted in U.S. dollars and cents per metric ton. The minimum price fluctuation shall be \$0.25 per metric ton (\$12.50 per contract).

14I02.D. Special Price Fluctuation Limits

At the commencement of each trading day, the contract shall be subject to special price fluctuation limits and daily price limits as set forth in Rule 589 and in the Special Price Fluctuation and Daily Price Limits Table in the Interpretations & Special Notices Section of Chapter 5.

14I02.E. 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.

14102.F. Termination of Trading

Trading shall cease on the 15th calendar day in the month prior to the contract month. If that is not a business day for both the Exchange and Euronext Paris S.A., trading shall cease on the first business day following the 15th calendar day in the month prior to the contract month.

14103. FINAL SETTLEMENT

Final settlement under the contract shall be by cash settlement. The final settlement price will be the Floating Price calculated on the last trading date.

14104. DISCLAIMERS

Euronext is a trademark of Euronext N.V. and is used with permission by The Board of Trade of the City of Chicago, Inc. for use with certain products.

The WM/Refinitiv Intraday Spot Rates are provided by Refinitiv. Refinitiv shall not be liable for any errors in or delays in providing or making available the WM/Refinitiv Spot Rates, nor for any actions taken in reliance on the same. The Intraday Spot Rates cannot be used, reproduced, distributed, redistributed, licensed or disclosed in any way without a written agreement with Refinitiv.

Chapter 14J

KC HRW Wheat – European Milling Wheat Spread Futures

14J00. SCOPE OF CHAPTER

This chapter is limited in application to the KC HRW Wheat – European Milling Wheat Spread Futures contract. The provisions of these rules shall apply to all futures 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.

For purposes of this chapter, unless otherwise specified, times referred to herein shall refer to and indicate Central European Time (CET).

14J01. CONTRACT SPECIFICATIONS

The Floating Price for each contract month will be equal to the Euronext Paris S.A. European Milling Wheat Futures relevant contract month settlement price converted to U.S. dollars using the mid-rate of the WM/Refinitiv 6:30 p.m. Central European Time Intraday Spot Rate for EUR/USD minus the relevant contract month KC HRW Wheat daily marker (as described in the Settlement Procedure Document) converted into metric tons on the last trading day for the contract, rounded to the nearest 1 cent.

For example, the May expiry of the KC HRW Wheat – European Milling Wheat Spread Futures contract will be settled by subtracting the KC HRW Wheat daily marker's May price converted into metric tons from the European Milling Wheat Futures May settlement price converted into U.S. dollars using the mid-rate of the WM/Refinitiv 6:30 p.m. Central European Time Intraday Spot Rate for EUR/USD, rounded to the nearest 1 cent.

14J02. TRADING SPECIFICATIONS

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

14J02.A. Trading Schedule

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

14J02.B. Trading Unit

The contract quantity shall be 50 metric tons. Each contract shall be valued as the contract quantity (50) multiplied by the settlement price.

14J02.C. Price Increments

Prices shall be quoted in U.S. dollars and cents per metric ton. The minimum price fluctuation shall be \$0.25 per metric ton (\$12.50 per contract).

14J02.D. Special Price Fluctuation Limits

At the commencement of each trading day, the contract shall be subject to special price fluctuation limits and daily price limits as set forth in Rule 589 and in the Special Price Fluctuation and Daily Price Limits Table in the Interpretations & Special Notices Section of Chapter 5.

14J02.E. 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.

14J02.F. Termination of Trading

Trading shall cease on the 15th calendar day in the month prior to the contract month. If that is not a business day for both the Exchange and Euronext Paris S.A., trading shall cease on the first business day following the 15th calendar day in the month prior to the contract month.

14J03. FINAL SETTLEMENT

Final settlement under the contract shall be by cash settlement. The final settlement price will be the Floating Price calculated on the last trading date.

14J04. DISCLAIMERS

Euronext is a trademark of Euronext N.V. and is used with permission by The Board of Trade of the City of Chicago, Inc. for use with certain products.

The WM/Refinitiv Intraday Spot Rates are provided by Refinitiv. Refinitiv shall not be liable for any errors in or delays in providing or making available the WM/Refinitiv Spot Rates, nor for any actions taken in reliance on the same. The Intraday Spot Rates cannot be used, reproduced, distributed, redistributed, licensed or disclosed in any way without a written agreement with Refinitiv.

EXHIBIT B

CBOT Rulebook

Chapter 5

(“Trading Qualifications and Practices”)

Position Limit, Position Accountability, and Reportable Level Table

(under separate cover)

EXHIBIT C

Exchange Fees

Level	Account Owner	Execution Type	Venue/ Transaction Type	Fee
1	Individual Members	Member Account Owner	CME Globex	\$1.20
			EFR	\$2.32
			Block	\$2.12
	Individual Delegates	Delegate Trading Own Account	CME Globex	\$1.27
			EFR	\$2.47
			Block	\$2.27
Equity Members (Individual Equity members, Clearing Equity Member Firms and Equity Member Firms)				
2	Rule 106.J Equity Member Firms Rule 106.I Affiliate Equity Member Firms Individual Equity Members (Other Member/Delegate executing trade) Clearing Equity Member Firms Rule 106.I Affiliate Membership Umbrella - Qualified Affiliate	Member or Delegate	CME Globex	\$1.20
			EFR	\$2.32
			Block	\$2.12
		Non-Member	CME Globex	\$1.30
			EFR	\$2.21
			Block	\$2.01
	Rule 106.S. Family of Funds Equity Member Firms	Member, Delegate or Non-Member	CME Globex	\$1.30
			EFR	\$2.21
			Block	\$2.01
Trading Members (Individual Non-Equity Members, Clearing Non-Equity Member Firms and Non-Equity Member Firms)				
3	Individual Non-Equity Members (Other Member/Delegate executing trade) Clearing Non-Equity Member Firms Rule 106.H. Member Firms Rule 106.I. Affiliate Trading Member Firms (w/ an owned seat)	Member, Delegate or Non-Member	CME Globex	\$1.40
			EFR	\$2.40
			Block	\$2.40
	Individual Delegates (Other Member/Delegate executing trade) Rule 106.I. Affiliate Trading Member Firms (w/ a leased seat)	Member, Delegate or Non-Member	CME Globex	\$1.45
			EFR	\$2.45
			Block	\$2.45
	Rule 106.S. Family of Funds Trading Member Firms	Member, Delegate or Non-Member	CME Globex	\$1.40
			EFR	\$2.40
			Block	\$2.40

Level	Account Owner	Execution Type	Venue/ Transaction Type	Exchange Fee
Electronic Corporate Member Firm				
4	Rule 106.R Electronic Corporate Member Firms (For other than CME Globex – See Non-Members)	Member, Delegate or Non-Member	CME Globex	\$1.45
Non-Members				
5	International Incentive Program (IIP) International Volume Incentive Program (IVIP) (For other than CME Globex – See Non-Members)	Member, Delegate or Non-Member	CME Globex	\$1.90

	Latin American Fund Manager Incentive Program (FMIP) (For other than CME Globex – See Non-Members)	Member, Delegate or Non-Member	CME Globex	\$1.90
	Non-Members	N/A	CME Globex	\$1.90
			EFR	\$2.75
			Block	\$2.75

Processing Fees	Fee
Exchange Fees for Non-Trades (Member/Delegate/Non-Member)	\$1.00
Exchange Fees for Non-Trades - Expired Options	\$0.10
Position Adjustment/Position Transfer	\$0.10
Give-Up Surcharge	\$0.06
Facilitation Fee	\$0.40

EXHIBIT D

CBOT Rulebook

Chapter 5

(“Trading Qualifications and Practices”)

Rule 588.H. – (“Globex Non-Reviewable Trading Ranges”) Table

(additions underscored)

Instrument	Globex Symbol	Outrights			Spreads	
		Globex Non-Reviewable Ranges (NRR)	NRR: Globex Format	NRR: Minimum Ticks	NRR: Globex Format	NRR: Minimum Ticks
<u>Chicago Wheat – European Milling Wheat Spread Futures</u>	<u>CWD</u>	<u>\$6.00 per metric ton</u>	<u>600</u>	<u>24</u>	<u>300</u>	<u>12</u>
<u>KC HRW Wheat – European Milling Wheat Spread Futures</u>	<u>KWD</u>	<u>\$6.00 per metric ton</u>	<u>600</u>	<u>24</u>	<u>300</u>	<u>12</u>

EXHIBIT E

CBOT Rulebook

Chapter 5

(“Trading Qualifications and Practices”)

Rule 589. - Special Price Fluctuation Limits and Daily Price Limits Table

(additions underscored)

Product	Rulebook Chapter	Commodity Code	PRIMARY/ASSOCIATED	ASSOCIATED WITH	Dynamically Calculated Variant – All Hours
<u>Chicago Wheat – European Milling Wheat Spread Futures</u>	<u>14I</u>	<u>CWD</u>	<u>Primary</u>	<u>Primary</u>	<u>\$12.00 per metric ton</u>
<u>KC HRW Wheat – European Milling Wheat Spread Futures</u>	<u>14J</u>	<u>KWD</u>	<u>Primary</u>	<u>Primary</u>	<u>\$12.00 per metric ton</u>

EXHIBIT F

Cash Market Overview and Analysis of Deliverable Supply

ANALYSIS OF DELIVERABLE SUPPLY

Wheat & KC Wheat European Milling Wheat Spreads

Cash Market Overview: Chicago Wheat

In estimating deliverable supply for the Wheat Futures, The Board of Trade of the City of Chicago, Inc. (“CBOT” or “Exchange”) relied on long-standing precedent, which provides that the key component in estimating deliverable supply is the portion of typical supply stocks that could reasonably be considered to be readily available for delivery. In its guidance on estimating deliverable supply, the Commodity Futures Trading Commission (“CFTC” or “Commission”) states:

In general, the term “deliverable supply” means 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. Typically, deliverable supply reflects the quantity of the commodity that potentially could be made available for sale on a spot basis at current prices at the contract’s delivery points. For a non-financial physical-delivery commodity contract, this estimate might represent product which is in storage at the delivery point(s) specified in the futures contract or can be moved economically into or through such points consistent with the delivery procedures set forth in the contract and which is available for sale on a spot basis within the marketing channels that normally are tributary to the delivery point(s).

Background:

All wheat production in the United States during the 2022/23 marketing year amounted to 1.65 billion bushels, with soft red winter wheat representing 336 million bushels or 20 percent of total U.S. wheat production.¹ Soft red winter wheat, which is the primary wheat class for the CBOT Wheat Futures contract (Rulebook Chapter 14; CME Globex/CME ClearPort Code: ZW/W), is primarily used to make cookies, cakes and crackers and is also used as a livestock feed. The United States Department of Agriculture (“USDA”) estimates the 2023/24 U.S. soft red winter wheat crop to increase compared to 2022/23 production levels, at 406 million bushels.

CBOT Wheat Futures Delivery Capacity:

Wheat shipping certificates may be issued from any one of the currently regular for delivery facilities located in the following territories:

- A. Chicago and Burns Harbor, Indiana Switching District - The Chicago Switching District is the area geographically defined by Tariff ICC WTL 8020-Series and that portion of the Illinois Waterway at or above river mile 304 which includes the Calumet Sag Channel and the Chicago Sanitary & Ship Canal. The Burns Harbor, Indiana Switching District is the area geographically defined by the boundaries of Burns Waterway Harbor at Burns Harbor, Indiana which is owned and operated by the Indiana Port Commission.
- B. The Toledo, Ohio Switching District. – The Toledo, Ohio switching district includes any facility that has a Toledo tariff.
- C. St. Louis - Alton Switching District - The St. Louis – Alton Territory shall be on the Mississippi River between Upper River mile markers 205 and 168.
- D. The Northwest Ohio Territory shall be shuttle loading facilities within the following 12 counties: Allen, Crawford, Hancock, Hardin, Henry, Huron, Marion, Putnam, Sandusky, Seneca, Wood, and Wyandot.
- E. The Ohio River facilities shall be river loading facilities on the Ohio River from mile marker 455 to the Mississippi River.
- F. The Mississippi River facilities shall be river loading facilities on the Mississippi River downriver from the St. Louis-Alton Switching District to mile marker 715.

Facilities approved for delivery on the Wheat Futures contract in the Mississippi River, Ohio River and St. Louis-East St. Louis-Alton territories are limited in the number of shipping certificates that they may issue to an amount not to exceed 20 times their total daily rate of loading barges, while facilities in the Chicago, Burns Harbor, Toledo and Northwest Ohio delivery territories shall not deliver more than their registered storage capacity. As of June 2024, firms regular for delivery on Wheat Futures had approved capacity to issue 38,997 shipping certificates or 194.99 million bushels of wheat.

Below are the facilities regular for delivery on Wheat Futures in August 2024 along with the maximum number of shipping certificates they may issue, with each shipping certificate equivalent to 5,000 bushels:

Warehouse	Location	Capacity (Bu)	Maximum Certificates
Lakeside Grain Trading, LLC	Elevator B Chicago, IL	11,348,000	2,269
ADM Grain Company	Sauget, IL	615,000	220
Archer-Daniels-Midland Co.	St. Louis Elevator St. Louis, MO	1,573,000	314
Bunge North America	Fairmont City, IL	1,117,000	440
Cargill, Inc.	Elevator East St. Louis, IL	2,481,000	440

¹ See ERS Wheat Data (<https://www.ers.usda.gov/data-products/wheat-data/>) Table 6--Wheat classes: supply and disappearance, million bushels.

Ardent Mills, LLC	Alton, IL	2,500,000	500
Consolidated Grain and Barge	Cahokia, IL	899,000	220
Louis Dreyfus Company River Elevators LLC	Cahokia, IL	750,000	220
COFCO GROWMARK LLC	Cahokia, IL	THROUGH PUT	440
The Andersons	Andersons-Illinois Elevator (Maumee, OH)	16,310,000	3,391
The Andersons	River Elevator (Toledo, OH)	6,570,000	1,240
The Andersons	Conant Street Elevator (Maumee, OH)	2,870,000	656
The Andersons	Edwin Drive Elevator (Toledo, OH)	5,900,000	1,180
The Andersons	Toledo, OH (Reynolds Rd)	983,000	196
Archer-Daniels-Midland Co. (dba ADM Grain Company)	Toledo Elevator (Toledo, OH)	9,795,000	1,959
Archer-Daniels-Midland Co. (dba ADM Grain Company)	Ottawa Lake Elevator (Ottawa Lake, MI)	11,861,000	2,372
ADM Grain Company	Newburgh, IN	2,450,000	440
ADM Grain Company	Evansville, IN (Broadway)	1,005,000	440
ADM Grain Company	Evansville, IN (Ohio St)	1,803,500	220
ADM Grain Company	Rockport, IN	2,400,000	440
ADM Grain Company	Mound City, IL	1,437,000	440
ADM Grain Company	Mt. Vernon, IN	7,579,751	220
ADM Grain Company	Paducah, KY	225,000	220
ADM Grain Company	Ledbetter, KY	4,400,000	220
ADM Grain Company	Silver Grove, KY	393,000	440
ADM Grain Company	Henderson, KY	2,107,000	220
Cargill, Inc.	Cincinnati, OH (Kellogg Avenue)	422,000	220
Cargill, Inc.	Cincinnati, OH (River Road)	440,000	220
Consolidated Grain and Barge Co.	Cincinnati, OH (Anderson Ferry)	1,602,000	220
Consolidated Grain and Barge Co.	Cincinnati, OH (Southside Riverside)	1,795,000	220
Consolidated Grain and Barge Co.	Aurora, IN	1,928,000	220
Consolidated Grain and Barge Co.	Jeffersonville, IN	3,116,000	220
Consolidated Grain and Barge Co.	Owensboro, KY	202,000	220
Consolidated Grain and Barge Co.	Mt. Vernon, IN	4,317,000	220
Consolidated Grain and Barge Co.	Mound City, IL	3,472,000	220
Consolidated Grain and Barge Co.	Uniontown, KY	2,540,000	220
Viterra USA Grain, LLC	Maceo, KY	1,445,000	440
Viterra USA Grain, LLC	Henderson, KY	2,554,000	440

Owensboro Grain Holding Company, Inc.	Owensboro, KY	3,467,000	220
ADM Grain Company	New Madrid, MO	2,623,000	440
ADM Grain Company	Memphis, TN	2,519,000	440
Cargill, Inc.	Buffalo Island, MO	1,661,000	220
Cargill, Inc.	New Madrid, MO	3,503,000	220
Cargill, Inc.	Hickman, KY	2,969,000	220
Cargill, Inc.	West Memphis, AR	996,000	220
Consolidated Grain and Barge	Grand Tower, IL	578,000	220
Consolidated Grain and Barge	Hickman, KY	1,451,000	440
Consolidated Grain and Barge	Portageville, MO	2,759,000	440
Consolidated Grain and Barge	Finley, TN	2,298,000	220
Consolidated Grain and Barge	Memphis, TN	1,873,000	220
Consolidated Grain and Barge	West Memphis, AR Elevator B	599,000	220
Consolidated Grain and Barge	Charleston, MO	146,000	220
Consolidated Grain and Barge	Cape Girardeau, MO	132,000	220
Consolidated Grain and Barge	Caruthersville, MO	850,000	220
Consolidated Grain and Barge	Caruthersville, MO (Cottonwood Point)	387,000	220
Consolidated Grain and Barge	East Prairie, MO	589,000	220
Consolidated Grain and Barge	Osceola, AR	609,000	220
Consolidated Grain and Barge	Scott City, MO	369,000	220
Consolidated Grain and Barge	West Memphis, AR Elevator A	964,000	220
Viterra USA Grain, LLC	Rockwood, IL	1,058,000	440
Louis Dreyfus Company River Elevators LLC	West Memphis, AR	766,363	220
Cargill, Inc.	Lima, OH	2,140,000	385
Sunrise Cooperative	Clyde, OH	8,275,000	1,655
Sunrise Cooperative	Galion, OH	6,987,000	1,397
Sunrise Cooperative	Wakeman, OH	8,781,000	1,756
Heritage Cooperative, Inc.	Upper Sandusky, OH	3,528,000	705
Heritage Cooperative, Inc.	Kenton, OH	3,601,000	720
Legacy Farmers Cooperative	Fostoria, OH	8,550,000	1,710
Legacy Farmers Cooperative	Findlay, OH	4,914,000	982

Legacy Farmers Cooperative	Custar, OH	3,717,000	742
Gerald Grain Center, Inc.	Hamler, OH	1,743,000	348

CBOT Wheat Futures Deliverable Supply Procedures and Estimate:

Each Tuesday the Exchange publishes wheat meeting deliverable grades that are in-store as of the previous Friday at all regular delivery facilities. The USDA-AMS publishes a weekly Grain Transportation Report (“GTR”) that covers developments affecting the transport of grain, both in the domestic and international marketplace (<https://www.ams.usda.gov/services/transportation-analysis/gtr>). This weekly publication reports on the latest volume and price data for barges, railroads, trucks, and ocean vessels involved in the transport of grain. Included in this report is the amount of wheat shipped through Lock 52² on the Ohio River, which is a measure of wheat flowing through the Ohio River delivery territory for Wheat futures.³

Deliverable supply is estimated as the stocks of grain in regular facilities on the Friday prior to First Notice Day plus the amount of wheat that passes through Lock 52 on the Ohio River during the four weeks prior to First Notice Day.⁴ This is a very conservative estimate of deliverable supply because it does not contemplate the significant amount of wheat that is near the delivery facilities and could easily be placed into delivery position in a short timeframe. While this estimate of deliverable supply does not attempt to include these stocks, it could be estimated to some degree using economic theory. Economic theory and the theory of storage would suggest these uncounted stocks would likely exceed the stocks reported in the Stocks of Grain report.⁵ Regular delivery facilities on the Ohio and Mississippi Rivers are in position to aggregate wheat for export; thus, the value of wheat in most of the river delivery facilities is greater than the value of wheat in the country because wheat in the country needs to be transported to be in position for export. The cost to store wheat includes opportunity cost, and opportunity costs increase with value. Thus, the cost to store wheat in position at a regular delivery facility is greater than the cost to store in the country all other factors equal. If there is wheat being stored in position in a river facility, it suggests export demand, and theory would suggest a greater amount of stocks would be stored internally due to the lower cost. The Exchange may, at a later date, decide to estimate these stocks and include them in future deliverable supply estimates.

Futures Contract Expiration	Wheat Movement through Lock 52 on the OH River during the 4 Weeks Prior to FND (1M Bushels)	Deliverable Stocks of Wheat in Regular Facilities on the Friday prior to FND (1M Bushels)	Total Stocks (1M Bushels)
Mar-24	1.58	30.61	32.19
Mar-23	1.71	30.28	31.99
Mar-22	0.29	23.28	23.57
MAR AVG	1.19	28.06	29.25
May-24	2.95	30.61	33.56
May-23	1.40	23.70	25.10

² http://marinas.com/view/lock/31_Ohio_River_Lock_52_Brookport_IL_United_States

³ See Table 10, <https://www.ams.usda.gov/services/transportation-analysis/gtr-datasets>.

⁴ This analysis does not include SRW wheat flowing down the Illinois and Upper Mississippi Rivers that would also be deliverable on the CBOT Wheat futures contract in the Alton – St. Louis delivery territory. Wheat statistics are available on the lowest lock on the Mississippi River, which would capture these data, but because these stocks are not differentiated between classes and likely contain significant amounts of spring wheat, the Exchange opted not to include these stocks in this analysis. Spring wheat is deliverable on the Wheat Futures contract, but rarely delivered, so this analysis focuses on SRW wheat. Ohio River stocks included in this report are predominantly, if not virtually all, SRW wheat.

⁵ See <https://onlinelibrary.wiley.com/doi/10.2307/1243220>

	May-22	2.56	19.04	21.60
MAY AVG		2.30	24.45	26.75
	Jul-23	0.30	32.98	33.28
	Jul-22	0.63	34.11	34.74
	Jul-21	0.35	22.39	22.74
JUL AVG		0.43	29.83	30.25
	Sep-23	3.52	61.36	64.88
	Sep-22	3.67	42.29	45.96
	Sep-21	2.53	33.13	35.66
SEP AVG		3.24	45.59	48.83
	Dec-23	0.23	62.67	62.90
	Dec-22	0.00	39.39	39.39
	Dec-21	0.35	34.38	34.73
DEC AVG		0.19	45.48	45.67
AVG ALL DELV MONTHS		1.47	34.68	36.15

Seasonality:

The Exchange typically evaluates seasonality on the deliverable supply across all available contract months of the Wheat Futures contract. To the extent that 25 percent of any contract month's future estimated deliverable supply falls below the current spot month limit, the Exchange would conduct an analysis to evaluate if an adjustment to the spot-month position limit for that corresponding contract month(s) is appropriate. In the past, the May and July contract months may have qualified for such adjustments. However, due to an increased in overall stocks throughout the year, this seasonality is no longer a constraining factor.

Long Term Contracts:

There is no readily available data on wheat under long-term contracts or agreements that could not be delivered on futures and should not be counted in deliverable supply estimates. To get a sense of the extent wheat is under long-term agreements and not deliverable, the Exchange consulted with its wheat regular delivery firms. Feedback from these firms indicated that generally zero (0) percent of wheat in their facilities is under long-term agreement and could not be delivered against the Wheat Futures contract. One firm indicated generally zero percent under long-term agreement but at the very most five percent during some limited time frames. Given this feedback and the conservative nature of the estimate, the Exchange does not believe wheat stocks under long-term agreements significantly affect deliverable supply.

Analysis of Deliverable Supply:

Based on the above analysis, the Exchange estimates the monthly deliverable supply over the past three (3) years to be 36.15 million bushels or 7,230 contract equivalents (contract size: 5,000 bushels).

The current spot month position limit is 1,200 contracts and the current single month position limit is 19,300 contracts.

Cash Market Overview: Kansas City Wheat

In estimating deliverable supply for the KC HRW Wheat Futures, The Board of Trade of the City of Chicago, Inc. (“CBOT” or “Exchange”) relied on long-standing precedent, which provides that the key component in estimating deliverable supply is the portion of typical supply stocks that could reasonably be considered to be readily available for delivery. In its guidance on estimating deliverable supply, the Commodity Futures Trading Commission (“CFTC” or “Commission”) states:

In general, the term “deliverable supply” means 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. Typically, deliverable supply reflects the quantity of the commodity that potentially could be made available for sale on a spot basis at current prices at the contract’s delivery points. For a non-financial physical-delivery commodity contract, this estimate might represent product which is in storage at the delivery point(s) specified in the futures contract or can be moved economically into or through such points consistent with the delivery procedures set forth in the contract and which is available for sale on a spot basis within the marketing channels that normally are tributary to the delivery point(s).

Background:

All wheat produced in the U.S. in marketing year 2022/23 amounted to 1.65 billion bushels, with hard red winter (HRW) wheat, the deliverable class on the KC HRW Wheat Futures contract (Rulebook Chapter [14H](#); CME Globex/CME ClearPort Code: KE/KW), representing 531 million bushels or 32 percent of total U.S. wheat production. HRW is high-protein wheat that is primarily milled into flour used in bread production. The United States Department of Agriculture (“USDA”) projects a 2023/24 U.S. HRW wheat crop of 514 million bushels, a decrease of about 3 percent from 2022/23 numbers.

KC HRW Wheat Futures Delivery Capacity:

KC Wheat shipping certificates may be issued from any one of the currently regular for delivery elevators or warehouses located in the following switching limits:

- 1.) Kansas City, Missouri/Kansas,
- 2.) Hutchinson, Kansas,
- 3.) Salina/Abilene, Kansas, or
- 4.) Wichita, Kansas.

Below are the facilities regular for delivery on KC HRW Wheat Futures as of June 2024 along with their storage capacity in bushels and maximum number of shipping certificates they may issue, with each shipping certificate equivalent to 5,000 bushels. As of June 2024, firms regular for delivery on KC HRW Wheat Futures had regular storage capacity of approximately 166.8 million bushels and the ability to issue up to 33,364 shipping certificates.

Warehouse	Elevator	Capacity (Bu)
ADM Grain Company	Wolcott (Kansas City)	2,526,000
Bartlett Grain Company, LP	KCT #1 (Kansas City)	4,307,000
Bartlett Grain Company, LP	River Rail (Kansas City)	10,039,000
Bartlett Grain Company, LP	Fairfax (Kansas City)	10,031,000
Hansen-Mueller Co.	Katy (Kansas City)	4,545,000
ADM Grain Company	Elevator A (Hutchinson)	3,231,000

ADM Grain Company	Elevator I (Hutchinson)	6,836,000
ADM Grain Company	Elevator J (Hutchinson)	18,307,000
Cargill, Inc.	Hutchinson (Hutchinson)	4,394,000
Cargill, Inc.	Hutchinson W (Hutchinson)	4,448,000
ADM Grain Company	Salina A (Salina/Abilene)	4,197,000
Cargill, Inc.	Salina (Salina/Abilene)	31,409,000
Flint Hills Grain, LLC	Abilene (Salina/Abilene)	2,152,000
The Scoular Company	Salina (Salina/Abilene)	12,096,000
Bartlett Grain Company, LP	Wichita (Wichita)	12,080,000
Viterra USA Grain, LLC	Wichita (Wichita)	30,542,000
Ardent Mills, LLC	Wichita (Wichita)	5,682,000

KC HRW Wheat Futures Deliverable Supply Procedures and Estimates:

Each Tuesday the Exchange publishes wheat meeting deliverable grades that are in-store as of the previous Friday at all regular delivery facilities. Deliverable supply is estimated as the stocks of grain in regular facilities on the Friday prior to First Notice Day. Although this measure does not distinguish stocks under long-term agreements, it is likely a very conservative estimate of deliverable supply because it does not count the significant amount of wheat that is likely near the delivery facilities and could easily be placed into delivery position very quickly. The Exchange may, at a later date, decide to estimate these stocks and included them in future deliverable supply estimates.

Futures Contract Expiration	Stocks of Wheat in Regular Facilities on the Friday prior to FND (1M Bushels)
Mar-24	39.91
Mar-23	33.70
Mar-22	57.31
MAR AVG	43.64
May-24	35.57
May-23	26.59
May-22	51.81
MAY AVG	37.99
Jul-23	25.38
Jul-22	52.54
Jul-21	70.17
JUL AVG	49.36
Sep-23	45.41
Sep-22	60.36
Sep-21	81.89
SEP AVG	62.55

Dec-23	48.12
Dec-22	50.52
Dec-21	74.52
DEC AVG	57.72
AVG ALL DELV MONTHS	50.25

Seasonality:

The Exchange evaluates seasonality on the deliverable supply across all KC HRW Wheat Futures contract expirations. To the extent that 25 percent of any contract month's future estimated deliverable supply falls below the current spot month limit, the Exchange will evaluate whether there is a need to adjust the spot-month position limit for that corresponding contract month.

Long Term Contracts:

There is no readily available data on KC HRW wheat under long-term contracts or agreements that could not be delivered on futures and should not be counted in deliverable supply estimates. Past outreach to regular warehousemen suggests long-term agreements should not affect grain in-store should it become economical to deliver against futures.

Protein:

To be delivered against KC HRW Wheat Futures, wheat must be at least 10.5 percent protein. Average Kansas protein content always exceeds 11 percent.⁶ However, given variability in quality, some portion of wheat in storage at any given time could grade below 10.5 percent. However, Kansas grain elevators do a good job using wheat from high protein years to blend with wheat from lower protein wheat, so that, over time, virtually all stocks of wheat are deliverable. The conversion of delivery instrument from warehouse receipt to shipping certificate, which would allow a regular elevator to deliver against stocks of high-protein wheat located at another facility likely adds to an elevator's ability to blend virtually all stocks.

Analysis of Deliverable Supply:

Based on the above analysis, the Exchange estimates the monthly deliverable supply over the past three (3) years to be 50.25 million bushels or 10,050 contract equivalents (contract size: 5,000 bushels).

The current spot month position limit is 1,200 contracts and the current single month position limit is 12,000.

Cash Market Overview: European Milling Wheat

In estimating deliverable supply for the Euronext European Milling Wheat Futures contract, The Board of Trade of the City of Chicago, Inc. ("CBOT" or "Exchange") relied on long-standing precedent, which provides that the key component in estimating deliverable supply is the portion of typical supply stocks that could reasonably be considered to be readily available for delivery. In its guidance on estimating deliverable supply, the Commodity Futures Trading Commission ("CFTC" or "Commission") states:

In general, the term "deliverable supply" means 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

⁶ See, for example,

https://www.nass.usda.gov/Statistics_by_State/Kansas/Publications/Cooperative_Projects/Wheat_Quality/index.php

period, barring abnormal movement in interstate commerce. Typically, deliverable supply reflects the quantity of the commodity that potentially could be made available for sale on a spot basis at current prices at the contract's delivery points. For a non-financial physical-delivery commodity contract, this estimate might represent product which is in storage at the delivery point(s) specified in the futures contract or can be moved economically into or through such points consistent with the delivery procedures set forth in the contract and which is available for sale on a spot basis within the marketing channels that normally are tributary to the delivery point(s).

Background:

The European Union ("EU"), along with the U.S., Canada, Argentina, Australia, and the Black Sea region, is one of the key global wheat producers and exporters. France is the lead producing country within the EU. A liquid European wheat futures contract exists at Euronext, and the contract trades FOB at the French ports of Dunkirk, La Pallice, Montoir, Nantes or Rouen. Anyone maintaining positions in the Euronext Milling Wheat contract at contract expiration must make or take physical delivery of wheat in an approved facility in one of the five ports and must load-out within a specified timeframe.

Euronext Wheat Futures Deliverable Supply Procedures and Estimates:

All wheat produced within the EU is considered deliverable through the European Milling Wheat Futures contract. European wheat production from USDA PSD and French wheat production, for reference, from ArgiMer for the last seven (7) years is found below:⁷

Year	European Wheat Production	French Wheat Production
2017/2018	136,681,000	36,559,000
2018/2019	123,124,000	34,045,000
2019/2020	138,799,000	39,516,000
2020/2021	126,684,000	29,210,000
2021/2022	138,479,000	35,396,000
2022/2023	134,293,000	33,694,000
2023/2024	134,150,000	35,059,000

To better ascertain actual deliverable supply, the Exchange looked at French exports rather than French production. The latest three (3) years of available French wheat export data, from UN COMTRADE, is found below:⁸

Year	French Wheat Exports (MT)
2020	19,792,218
2021	16,090,201
2022	20,151,557

Because the European Milling Wheat contract represents European wheat exported through France at five (5) ports, the Exchange cut total French wheat exports by two measures. First, the Exchange calculated, via data found at ArgiMer, that inter-EU exports account for approximately half of wheat exports from France. It is unlikely that those exports would flow through the five ports identified in the Euronext Milling Wheat contract, so only non-EU exports were considered. This equates to approximately half of total exports of wheat from France. Second, there are ports in France that are not deliverable on the Euronext

⁷ https://www.franceagrimer.fr/content/download/73671/document/BIL-CER-cer_princ_camp-C23-24.pdf

⁸ <https://comtradeplus.un.org/>

Milling Wheat contract. The five ports that are part of the contract - Dunkirk, La Pallice, Montoir, Nantes or Rouen – account for 97 percent of total wheat exports from France, according to SitAgri.

Year	French Wheat Exports (MT)	Non-EU Exports	Euronext Port Exports
2020	19,792,218	9,896,109	9,599,226
2021	16,090,201	8,045,100	7,803,747
2022	20,151,557	10,075,779	9,773,505

Over the previous three (3) years of available data, the average annual wheat exported from Euronext-approved ports is 9,058,826 metric tons.

Quality Specifications:

To be delivered against the European Milling Wheat Futures contract, wheat should meet the following specifications:

- Hagberg falling number: 220 seconds
- Protein content: 11% dry matter
- Specific weight: 76 kg/hl
- Moisture content: 15% or less
- Broken kernels: 4% or less
- Impurities: 2% or less

It is approximated via industry sources that 75 percent⁹ of wheat exports from France meet these specifications. Therefore, when these measures are taken into account, the average annual wheat exported from Euronext-approved ports that meets quality specifications is 6,794,120 metric tons. Monthly data are not available.

Analysis of Deliverable Supply:

Based on the above analysis, the Exchange estimates the monthly deliverable supply over the past three (3) years to be 6,794,120 metric tons. The European Securities and Markets Authority (“ESMA”) followed a similar methodology in May 2023 to estimate deliverable supply as well, though their figures are much higher partly due to consideration of EU imports and not discounting inter-EU exports.

ESMA sets the position limits as follows: Spot month (90 days from expiry) position limits are 70,000 contracts, which decreases to 20,000 contracts during the last twelve days of trading. Non-spot position limits are 120,000 contracts (the last 21 days before the spot-month expiry) and 100,000 contracts during all other times.

⁹ See: https://www.esma.europa.eu/sites/default/files/2023-05/ESMA70-155-13072_ESMA_Opinion_Position_Limits_Milling_Wheat_2023.pdf.

Deliverable Supply Analysis

Proposed position limits are outlined in the table below.

Contract Title	Rulebook Chapter	Commodity Code	Single Month Limit	All-Month Limit
Chicago Wheat - European Milling Wheat Spread Futures	14I	CWD	52,000	52,000
KC HRW Wheat - European Milling Wheat Spread Futures	14J	KWD	32,000	32,000

Position limits for the related referenced contracts are provided below. The Chicago Wheat – European Milling Wheat Spread Futures and the KC HRW Wheat – European Milling Wheat Spread Futures contracts are referenced contracts, but will not be subject to federal position limits during the spot month. The core reference futures contracts are Wheat Futures (Commodity Code: W) and KC HRW Wheat Futures (Commodity Code: KW) for CWD and KWD respectively.

Contract Title	Contract Size	Single Month Limit	All-Month Limit
Wheat Futures	5,000 bushels	19,300	19,300
KC HRW Wheat Futures	5,000 bushels	12,000	12,000
European Milling Wheat Futures	50 metric tons	100,000	100,000

Contract Title	Contracts	Bushels	Metric Tons	Spread Contracts
Wheat Futures	19,300	96,500,000	2,626,296	52,526
KC HRW Wheat Futures	12,000	60,000,000	1,632,930	32,659
European Milling Wheat Futures	100,000	183,718,500	5,000,000	100,000

Single and all-month position limits for each spread contract are proposed at the lower of the two relevant contracts, in spread contract equivalents. For example, KC HRW Wheat Futures has a single and all-month limit of 12,000 contracts, which is equal to 1,632,930 MT (12,000 contracts times 5,000 bushels times 0.0272155 MT per bushel) or 32,659 spread contract equivalents (1,632,930 MT divided by 50 MT). This is lower than the 100,000 spread contract equivalents limit for Euronext Milling Wheat Futures, so the KC HRW Wheat - European Milling Wheat Spread Futures single and all-month position limits will be based on the lower of the two, KC HRW Wheat Futures limits. The reportable level is 25 contracts.

All positions will be aggregated with their respective futures contracts (Wheat Futures or KC HRW Wheat Futures) at a 2.7:-1 ratio to ensure compliance with Commission and/or Exchange futures equivalent speculative position limits. For example, 27 long positions in the KC HRW Wheat - European Milling Wheat Spread Futures will be equivalent to 10 short positions in KC HRW Wheat Futures for the purposes of single and all-month position limits.

EXHIBIT G

Settlement Procedure Documents

Chicago Wheat-European Milling Wheat Spread Futures and KC HRW Wheat-European Milling Wheat Spread Futures

Normal Daily Settlement Procedure

CME Group staff determines the daily settlements for Chicago Wheat-European Milling Wheat Spread Futures (CWD) and KC HRW Wheat-European Milling Wheat Spread Futures (KWD) based on trading activity on CME Globex between 18:20:00 and 18:30:00 Central European Time (CET), the settlement period.

Tier 1: Each contract month settles to its volume-weighted average price (VWAP) of all trades that occur between 18:20 and 18:30 CET, the settlement period, rounded to the nearest tradable tick.

Tier 2: If no trades occur on CME Globex between 18:20 and 18:30 CET, the settlement period, then the last trade (or the contract's settlement price from the previous day in the absence of a last trade price) is used to determine whether to settle to the CME Globex bid or ask during this period.

- a. If the last trade price is outside of the bid/ask spread, then the contract month settles to the nearest bid or ask price.
- b. If the last trade price is within the bid/ask spread, or if a bid/ask spread is not available, then the contract month settles to the last trade price.

Tier 3: In the absence of any trade activity or bid/ask in a given contract month during the current trading day, the daily settlement price will be determined by applying the net change from the preceding contract month to the given contract month's prior daily settlement price.

If you have any questions, please call the CME Global Command Center at 800.438.8616, in Europe at 44.800.898.013, or in Asia at 65.6532.5010.

Note: In the event the aforementioned calculations cannot be made or if CME Group staff, in its sole discretion, determines that anomalous activity produces results that are not representative of the fair value of the contract, staff may determine an alternative settlement price.

Normal Final Settlement Procedure

For additional details on the final settlement calculations, please see the CBOT Rulebook (Chapter 14I and 14J).

Chicago Wheat and KC HRW Wheat Futures Daily Marker Derivation Procedure

Normal Daily Marker Derivation Procedure

CME Group staff determines the daily Chicago Wheat (CW1) and KC HRW Wheat (KW1) Markers by incorporating CME Globex trading activity in the Wheat Futures and KC HRW Wheat Futures, respectively, between 18:20 and 18:30 Central European Time (CET), the Marker Derivation period.

Lead Month

The designated lead month* Marker is derived according to the following procedure:

- Tier 1:** The lead month price is the volume-weighted average price (VWAP) of the outright trades between 18:20 and 18:30 CET rounded to the nearest tradable tick.
- Tier 2:** If there is no VWAP, then the last trade price is checked against the current bid/ask.
 - a. If the last trade price is outside of the bid/ask spread, then the contract derives to the nearest bid or ask price.
 - b. If the last trade price is within the bid/ask spread or if a bid/ask is not available, then the contract derives to the last trade price.
- Tier 3:** If there is no last trade price available, then the prior day settlement is checked against the current bid/ask.
 - a. If the prior settle is outside of the bid/ask spread, then the contract derives to the nearest bid or ask price.
 - b. If the prior settle is within the bid/ask spread or if a bid/ask is not available, then the contract derives to the prior settlement price.

Deferred Months

Deferred contract months consist of all non-lead months and derive according to the following procedure:

- Tier 1:** All months other than the designated lead month will be derived based upon the VWAP of calendar spread transactions executed on CME Globex from 18:20 – 18:30 CET.
- Tier 2:** In the absence of relevant calendar spread trades, bids and offers in those calendar spreads will be used in conjunction with marker derivations from any months where a marker price has been determined to form an implied market in the contract to be settled. These implied markets, along with the outright bid/ask market for the contract, will be used to derive the best possible bid and the best possible ask. Provided that implied bid/ask spread is consistent with reasonability thresholds for the product (20 ticks), as determined by the Global Command Center, the contract will derive to the midpoint of the implied bid/ask spread.
- Tier 3:** In the absence of an implied best bid/best ask that meets reasonability thresholds, the net change of the previous contract month will be applied to determine the contract's marker price. However, if a contract is initially derived to the net change of the previous month and there are posted markets at 18:30 CET in one or more calendar spreads with that contract as the nearby leg, then the marker price will be adjusted on a subsequent iteration based upon the implied best bid/best ask of those calendar spreads, provided it is consistent with bid/ask reasonability thresholds.
- Tier 4:** If the marker price in a deferred month created by using the “net change” method described above violates a bid or an offer in a calendar spread or in the deferred month itself that could otherwise be honored, the marker price for that deferred month will be adjusted to honor that bid or offer. If not all spread bids or offers can be honored in this way, precedence will be given to the tightest bid/ask markets.

*The designated lead month in each product will roll on the 12th business day of the calendar month that precedes the current lead month. For more information, please see [SER-7005](#).

Option Expiration Procedures: On the last trading day of an expiring option series, the underlying futures contract month of that option series will follow the lead month derivation procedures guideline outlined above (even if it is considered a deferred month at that time).

Note: In the event the aforementioned calculations cannot be made or if CME Group staff, in its sole discretion, determines that anomalous activity produces results that are not representative of the fair value of the contract, staff may determine an alternative settlement price.