September 16, 2026

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

Re: ICE Clear Europe Self-Certification Pursuant to Commission Rule Rule 40.6 – Parts NN, OO, PP, and QQ of Delivery Procedures

Dear Mr. Kirkpatrick:

ICE Clear Europe Limited ("ICE Clear Europe" or the "Clearing House"), a registered derivatives clearing organization under the Commodity Exchange Act, as amended (the "Act"), hereby submits to the Commodity Futures Trading Commission (the "Commission"), pursuant to Commission Rule 40.6 for self-certification, amendments to ICE Clear Europe's Delivery Procedures (the "Procedures")[1] to adopt new parts relating to delivery under new Gold Daily Futures, Silver Daily Futures, Platinum Daily Futures, and Palladium Daily Futures that will be cleared by the Clearing House (the "Contracts"). The amendments are to become effective on the first business day following the tenth business day after submission, or such later date as ICE Clear Europe may determine.

Concise Explanation and Analysis

ICE Clear Europe is adding four new parts to the Procedures relating to delivery under physically settled metals futures contracts: Parts NN (relating to ICE Deliverable Gold Daily Futures Contracts), OO (relating to ICE Deliverable Silver Daily Futures Contracts), PP (relating to ICE Deliverable Platinum Daily Futures Contracts) and QQ (relating to ICE Deliverable Palladium Daily Futures Contracts) (each a "New Part," and collectively the "New Parts"). The Contracts will be listed on the ICE Futures Europe exchange and will be cleared by ICE Clear Europe.

The New Parts each include defined terms relevant to delivery under the relevant Contract, including as to delivery specifications for the underlying commodity based on market standard good delivery rules, delivery days and months, and trade nominations. Deliveries under the Contracts will take place during the delivery period for the relevant contract in accordance with the ICE Futures Europe Rules and the Delivery Procedures. The New Parts provide that deliveries by sellers under the Contracts are to be effected by the transfer of unallocated gold, silver, platinum or palladium (the "Precious Metals"), as applicable, from the seller's nominated vault account to the Clearing House's London Precious Metals Clearing Limited ("LPMCL") vault account, in the case of Parts NN and OO, or London Platinum and Palladium

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

Market (“LPPM”) vault account, in the case of Parts PP and QQ. Deliveries taken by buyers under the Contracts are effected by the transfer of the relevant unallocated Precious Metal from the Clearing House’s LPMCL vault account or LPPM vault account, as applicable, to the nominated vault account of the buyer. Each of the buyer and seller under the Contracts settles directly with the Clearing House.

Each New Part additionally addresses the responsibilities of the Clearing House and relevant parties relating to delivery under the Contracts, as well as certain limitations on liability for the Clearing House and ICE Futures Europe (including in respect of specified actions, failures, errors or omissions by LPMCL, its electronic clearing system, or the vault operated by LPMCL or LPPM, as applicable). The provisions also address delivery margin and the calculation and invoicing of the payment of the contract values by buyers.

The New Parts further set out the required delivery documentation and related submission procedures. The provisions include detailed delivery timetables and descriptions of the operational processes and related documentation for routine delivery and late or failed delivery. These include the procedures relating to the use of the relevant LPMCL or LPPM vaults and required confirmations of delivery positions. The amendments discussed above also set out relevant deadlines for required actions by the relevant parties during the delivery process.

Compliance with the Act and CFTC Regulations

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

- *Product Eligibility*. ICE Clear Europe is adopting four new parts of the Delivery Procedures to facilitate clearing of the Contracts, which are physically settled metals futures contracts that will be traded on the ICE Futures Europe exchange and cleared by ICE Clear Europe. The amendments set out delivery specifications and procedures for the Contracts, as discussed herein. The Contracts are similar to other commodity contracts currently cleared by the Clearing House, and delivery will be effected in a manner similar to other such commodity contracts. Accordingly, ICE Clear Europe believes that its existing financial resources, risk management, systems and operational arrangements are sufficient to support clearing of the Contracts (and to address physical delivery under the Contracts), and to manage the risks related thereto. As such, ICE believes the amendments are consistent with the requirements of Core Principle C and Commission Rule 39.12(b).

- *Settlement Procedures*. As described above, the amendments will adopt new parts to the Procedures addressing delivery specifications, the role and use of the relevant vault account for the underlying asset, procedures for the transfer of the underlying between buyers and sellers and the delivery timetables and documentation requirements. Additionally, the amendments will address the rights and obligations of the Clearing House and Clearing Members in the context of delivery under the Contracts. As such, the amendments will facilitate the identification and management of the risks of the delivery under the Contracts for the Clearing House. As a result, ICE Clear Europe believes these amendments are consistent with the requirements of Core Principle E and Commission Rule 39.14.

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

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

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

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

If you or your staff should have any questions or comments or require further information regarding this submission, please do not hesitate to contact the undersigned at George.milton@ice.com or +44 20 7429 4564.

Very truly yours,

G. Milton

George Milton
Head of Regulation & Compliance