



December 6, 2023

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 –
Risk Identification Framework

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, this rule change retiring its Risk Identification Framework (the “Framework”).¹ The change will 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ICE Clear Europe is retiring its Risk Identification Framework, which the Clearing House believes is outdated and has been superseded by other of the Clearing House’s rules, policies, procedures and risk management practices. The existing Risk Identification Framework outlines certain considerations and practices for the Clearing House Board in classifying, exploring, identifying and monitoring material risks faced by the Clearing House. ICE Clear Europe believes that these matters are more fully covered in other Clearing House documentation and practices. The

¹ Capitalized terms used but not defined herein have the meanings specified in the ICE Clear Europe Clearing Rules.

Clearing House does not anticipate that the retirement of the Risk Identification Framework will change its policies or practices as it relates to its management of risk.

Compliance with the Act and CFTC Regulations

The retirement of the Framework is potentially relevant to the following core principle: (D) Risk Management and the applicable regulations of the Commission thereunder.

- *Risk Management.* As stated above, ICE Clear Europe is retiring the Framework as it is no longer necessary in light of other existing rules, policies, procedures and practices relating to risk management. In particular, the retirement of the Framework is not expected to result in changes to Clearing House risk management policies or practices. The amendment is thus consistent with the requirements of Core Principle D and Commission Rule 39.13.

As set forth herein, the amendment consists of the retiring of the Risk Identification Framework. ICE Clear Europe has requested confidential treatment with respect to the Risk Identification Framework, which has been submitted concurrently with this self-certification submission.

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@theice.com or +44 20 7429 4564.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'G. Milton', written in a cursive style.

George Milton
Head of Regulation & Compliance