TATE & LYLE
CONSISTENTLY FIRST IN RENEWABLE INGREDIENTS

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TO: U.S. Commodity Futures Trading Commission

SUBJECT: CME Proposal

Tate & Lyle is a global provider of ingredients and solutions to the food, beverage and other industries operating from over 30 production facilities around the world. Through our large-scale efficient manufacturing plants, we turn raw materials (primarily corn) into distinctive high quality ingredients for our customers. Our ingredients and solutions add taste, texture, nutrition and increased functionality to products that millions of people around the world use or consume daily.

Tate & Lyle utilizes the CME Group to manage our business risk via CME's hedging mechanisms related to corn and other hedgeable commodities.

CME Group operates trading exchanges that are utilized by many producers, processors, food manufacturers, feeders and trading companies to aid in price discovery for corn and other commodities. As such, U.S. farmers and the aforementioned businesses rely on CME to provide fair and equitable hedge tools to assist them in managing their various businesses.

We recently received notice that CME Group has submitted a proposal to the Commodity Futures Trading Commission (CFTC) to expand daily corn trading limits from $0.30 per bushel to $0.50 per bushel. CME last increased daily corn trading limits from $0.20 per bushel to $0.30 per bushel in March 2008. Since that expansion, we note approximately 27 trading sessions resulted in a limit corn move out of almost 800 trading sessions (i.e. less than 3.5% of trading sessions resulted in a limit corn move).

Our viewpoints regarding this CME proposal to increase the daily corn trading limit to $0.50 per bushel:

1. The current daily corn $0.30 per bushel did not restrain corn trade in over 96% of trading sessions from March 2008 to date. Obviously price discovery has not been impeded at the current $0.30 per bushel limit.

2. If the proposed increase is granted, it will result in a considerable increase in volatility, thus causing havoc for U.S. farmers and corn users in fairly and accurately pricing their inventories and contracts.

3. Margin costs for maintaining a corn position at CME will certainly increase; thus, increasing costs for U.S. farmers and users of corn.

4. Bank requirements will be more stringent as their risk profile increases dramatically due to increased corn volatility. It will be more difficult for U.S. farmers and users of corn to obtain financing.

5. Speculators will be more likely to use their large trading positions to distort prices; hence an increased risk to U.S. farmers and corn users. It is a common practice for speculators to push corn prices at times to "mark" their fund values to enhance shareholder profitability.

Tate & Lyle joins many others in our industry in asking the CFTC to oppose granting this CME proposal to increase corn daily trading limits to $0.50 per bushel. We view the current $0.30 per bushel daily corn limit as being more than adequate to allow all segments of the corn market to fairly and accurately provide price discovery. We see no benefit to the U.S. farmer or end users of corn to grant this increase.

Sincerely,

Matt Wolf