On Thursday, February 7th, Maite Fabregas, Giles Ward, Philip Tod, Emiliano Tornese and Jasper Jorritsma met with David Fernandez Valdes, Adam Jacobs and Roger Cogan of ISDA.

On commodity derivatives, they highlight that position management is a meaningful regime.
Friday morning Lucia, Giles and I met with Goldman Sachs on commodity derivatives.

- They are concerned that the Volcker rule might hinder appropriate risk hedging by producers and consumers of physical commodities. As an example there are 2 liquid oil benchmarks (WTI and Brent) but more than 80 varieties of crude oil.
On 18 November Valerie and I met Jiri Krol of AIMA to discuss MiFID, short selling and market abuse.

- Supports our position limits regime, especially the fact that the limits have to be introduced for derivatives traded on exchanges only (and not on OTC derivatives). I underlined that the national competent authorities had powers to intervene at any stage including by introducing position limits also for OTC derivatives.
  The implementation of post-trade transparency near real time for bespoke products such as complex derivatives might be an operational nightmare. There is no unique codification of products. I referred him to the work undertaken on data standardisation at international level (i.e. Legal Entity Identifier Initiative)
On 17/1-2013 Maria Teresa Fabregas, Philip Tod, Salvatore Gnoni and Peter Ohrlander met with the Association for Financial Markets in Europe, "AFME" re MiFID/R.

**General issues**

At the outset it was recalled that the efforts under MiFID feeds well into the current growth agenda.

**Commodities (position limit/position management):** AFME against absolute limits given the need for discretionary decision making. Thus one may sometimes need to go beyond limits.

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I had a quick chat with Jenny Cosco from Goldman Sachs.

She had two main questions:
1. Whether we were looking at the LME warehouse issue. She has heard that DG ENTR might be looking at this issue following the articles in the US press describing the long queues at the metals warehouses. Goldman Sachs owns one of these warehouses and wants to be sure the issue is understood correctly. I will check with DG ENTR whether there is anything going on. It might also be relevant for our level 2 legislation work.

2. (Blank)
On Thursday, 19 July 2012, Maite and Jasper met with Jiri Król of AIMA.

They consider hard position limits are not useful, and favour the Commission's proposed bottom-up approach of requiring venues to set the limits.

The CFTC lacked the data to set limits, as position reporting was not yet in place.

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On Tuesday, May 22\textsuperscript{nd}, Maite, Jasper, Valerie and Stephane met with AFME representatives (Gerry Cross – Managing Director, Pedro Pinto – Advocacy and Sidika Ulker – Manager Securitisation), Catherine Sutcliffe (JP Morgan) and Petra De Deye (BNPP).

- **Position limits**: they want to have the possibility for alternative arrangements.

You will also find attached materials given during the meeting with further explanations on their positions.

- AFME Comments on Presidency ...
- AFME Post Trade Transparency F...
- AFME MiFID MiFIR Industry P...

Stephane