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International Copper
Association
Copper Alliance

July 20, 2012

U.S. Department of Labor
Employee Benefits Security Administration
Top Hat Plan Exemption
200 Constitution Avenue NW, Room N-1513
Washington, D.C. 20210

Dear Sir or Madam:

We are submitting herewith the enclosed Statement required by Regulation Section 2520.104-23, to be filed with the Department of Labor for unfunded pension plans maintained by an employer for a select group of management or highly compensated employees.

Very truly yours,

INTERNATIONAL COPPER ASSOCIATION, LTD.

By: _____

John J. Kearns

Principal Financial and Administrative Officer

Enclosure

**STATEMENT OF COMPLIANCE UNDER DEPARTMENT OF LABOR
REGULATION § 2520.104-23**

This statement is being filed with the Department of Labor under Department of Labor Regulation § 2520.104-23 which provides an alternative method of compliance with the reporting and disclosure requirements of Part I of Title I of the Employee Retirement Income Security Act of 1974, as amended (the "Act") for unfunded pension plans maintained by an employer for a select group of management or highly compensated employees, pursuant to the authority of the Secretary of Labor under Section 110 of the Act.

The following is the information required to be disclosed:

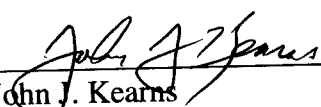
1. Name and address of employer:

International Copper Association, Ltd.
260 Madison Avenue
New York, New York 10016

2. Internal Revenue Service Employer Identification Number: 13-1926775
3. International Copper Association, Ltd. ("ICA") maintains the International Copper Association, Ltd. Eligible 457 Plan (the "457(b) Plan") and the International Copper Association, Ltd. Supplemental Deferred Compensation Plan (the "457(f) Plan") primarily for the purpose of providing deferred compensation for a select group of management or highly compensated employees of ICA.
4. The 457(b) Plan and the 457(f) Plan are the only plans that ICA maintains primarily for the purpose of providing deferred compensation for a select group of its management or highly compensated employees. There are four (4) employees and one (1) former employee in the 457(b) plan. There is one (1) employee in the 457(f) plan.

INTERNATIONAL COPPER ASSOCIATION, LTD.

By: _____


John J. Kearns

Principal Financial and Administrative Officer

July 20, 2012

COPPER

International Copper Association, Ltd.
260 Madison Avenue
New York, NY 10016-2401 USA

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