

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 27<sup>TH</sup> SESSION:  
COUNCIL - PART II**

***Informal Working Group - Inspection, Compliance and Enforcement***

*Please fill out one form for each textual proposal which your delegation(s) wish(es) to amend, add or delete and send to [council2022@isa.org.jm](mailto:council2022@isa.org.jm).*

**1. Name(s) of Delegation(s) making the proposal:**

The Pew Charitable Trusts

**2. Please indicate the relevant provision to which the textual proposal refers.**

DR 105

**3. Kindly provide the proposed amendments to the regulation or standard or guideline in the text box below, using the “track changes” function in Microsoft Word. Please only reproduce the parts of the text that are being amended or deleted.**

Recommend deleting this Regulation.

**4. Please indicate the rationale for the proposal. [150 word limit]**

We recommend deleting this regulation 105, as it seems redundant (being entirely duplicative of UNCLOS).

Alternatively, the text currently included in draft regulation 3 paragraph (c) (regarding coordination between the ISA’s and sponsoring states’ monitoring and enforcement measures) could be relocated here. And also expanded upon. We consider there should be more specific wording in the Regulations regarding the inter-play between the ISA and the State’s regulation. For example, more precise requirements for sponsoring States and the ISA to share monitoring data and Contractor reports, and to keep each other updated with regards any regulatory measures undertaken, as well as collaborative working where, for example, the ISA has the evidence of issues that need addressing, but the sponsoring State is the party with the access and powers to enforce compliance.