

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

***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:**

Russia

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

DR 103 (1)

**3. Kindly provide the proposed amendments to the regulation 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.**

At any time, if it appears ~~to the Secretary-General~~ on reasonable grounds that a Contractor is in breach of the terms and conditions of its exploitation contract, the ~~Secretary-General~~ [Council](#) shall issue a compliance notice to the Contractor requiring the Contractor to take such action as may be specified in the compliance notice.

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

As we have already stated, issuing of a compliance notice is beyond mandate and qualification of the Secretary-General, but lies within mandate of the Council. Possible ways forward, in our view, are to convene special sessions of the Council or to enhance the role of the Commission. Furthermore, a clear understanding of notion “reasonable grounds” should be elaborated in line with transparency principle. “Actions specifies in a compliance notice” could also be listed.