

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 27TH SESSION:
COUNCIL - PART III**

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

1. Name of Working Group:

Inspection, Compliance and Enforcement

2. Name(s) of Delegation(s) making the proposal:

Federal Republic of Germany

3. Please indicate the relevant provision to which the textual proposal refers.

DR 100

4. 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.

1. ~~Thirty days after~~ ~~[At]~~ the end of an inspection, the Inspector shall ~~[prepare]~~ ~~[deliver]~~ a report ~~[promptly]~~ to the ~~[Inspectorate]~~, [in accordance with the ~~template to be prescribed in the applicable~~ ~~Ss~~standards], setting out the findings and any recommendations for improvements in [performance], procedures or practices by a Contractor.

5. Please indicate the rationale for the proposal. [150-word limit]

We agree with comments that the word ‘deliver’ is more suitable than ‘prepare’. We would like further discussion on to whom the report should be delivered, and once again, we believe it is important for the Council to agree on the institutional arrangements for inspection. The provision goes on to say that once receiving the report, the Inspectorate shall send the report to, among others (from the suggestions currently on the table), the Secretariat, the LTC, the Compliance Committee, the Council, the contractor, the sponsoring state, the coastal state, the flag state. If this is the case, it is not clear why there is this additional step of first sending it to the Inspectorate, and why such a report would not be made public (with confidential information redacted where necessary) instead. One reason of having this intermediary could be to redact such confidential information before the document is widely disseminated, but this is not clear. We invite more discussion on this matter at the next meeting. On this note, it is vital to discuss the institutional arrangement of inspection. For instance, such a report will be crucial if there are instances of non-compliance, upon which, the LTC or a Compliance Committee should further investigate.