

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 28TH SESSION:
COUNCIL - PART I**

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:

Open Ended Working Group on Financial Terms of a Contract

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

The Pew Charitable Trusts

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

DR 71

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.

- **Red font** are proposed amendments by the Facilitator in this revised text.
- Our proposed amendments and our questions or comments regarding the facilitator’s remarks are indicated as in-line edits in **blue**. Proposed deletions of text proposed by the facilitator appears in strikethrough and **bold**.

(1)(e) [Details of all revenues and operating costs associated with activities in handling and processing, to the degree available.]

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

Regarding DR 71, we support the proposed inclusion of new paragraph 1(e), which aims to ensure that the Authority is appropriately informed, to the degree possible, of sales beyond the Contract Area, as a means of due diligence with regards the entire value chain. We wish to raise that this is a question not only of environmental standards, but also of social and human rights standards. Although we appreciate that such matters are not directly under the ISA’s jurisdiction for regulatory purposes, the ISA is responsible to ensure that the common heritage resources of the Area are developed for the benefit of humankind as a whole, and this would not be served by enabling downstream processes that, for example, cause environmental crimes, or human rights abuses.