

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS
DURING THE 29TH 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.im.

1. Name of Working Group:

Informal Working Group on Institutional Measures

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

Submitted by Nauru Ocean Resources Inc., Tonga Offshore Mining Ltd. and Blue Minerals Jamaica Ltd.

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

Draft Regulation 14(1)(a)

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.

Regulation 14 [IWG IM]

Amendments to the proposed Plan of Work

1. At any **reasonable** time prior to making its recommendation to the Council and as part of its consideration of an application under Regulation 12, the Commission may:

(a) Request the applicant to provide additional information on any aspect of the application ~~within 30 Days of the date when the application is first considered—prior to making a recommendation,~~ while ensuring that any such request is necessary, proportionate and will not prevent the Commission from meeting the approval timeline set out in the relevant Standard; and [...]

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

- We are concerned that the proposed amendments to Draft Regulation 14(1)(a) could inadvertently result in repeated requests and review loops in the consideration of applications. This could result in the addition of significant time and effort to the Commission’s work and also impose unclear regulatory burden on applicants (in particular noting stakeholder consultation requirements).
- It is important that the application process and review procedure is clear from the outset so that applicants have certainty regarding how their application will be processed. As such, we propose amendments to this sub-paragraph to ensure that requests for additional information are predictable and efficient and do not result in endless consideration of applications.