

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 29<sup>TH</sup> SESSION:  
COUNCIL - PART II**

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](mailto:council@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.**

Draft regulation 17

**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.**

1. Upon the Council’s approval of a Plan of Work ~~and request from the Council~~, the Secretary-General shall prepare an Exploitation Contract between the Authority and the applicant in the form prescribed in Annex IX to these Regulations.

(...)

3. The Exploitation Contract and its schedules is a public document, and shall be published ~~[without undue delay]~~ **[within 7 Days]** in the Seabed Mining Register, except for Confidential Information, which shall be redacted.

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

Regarding paragraph (1), like others, we wonder if this should read ‘*Upon the Council’s approval of a Plan of Work and request from the Council...*’. This formulation, requiring a request from Council before a contract is negotiated and finalised, aligns with DR 16(3)(alt). It is also recommended in case there may be situations arising in which a Plan of Work is approved provisionally, but there is a reason for delaying the contract signature. It seems sensible in this way to future-proof the Regulations, to keep the Council in the driving seat for Contract issuance.

For paragraph (3) regarding publication of the contract on the seabed mining register, like the UK, Costa Rica, Portugal, African Group, and France, we would also prefer a very specific timeline for publication. We also support the point made by Germany that it will help to make the paragraph actionable and enforceable, if it is expressly stated that the publication (and redaction) is a duty of the Secretariat. Within 7 days of signature would seem reasonable to us. It may however be helpful to invite comments from the Secretariat on this, to ascertain if this would be difficult to achieve from an administrative perspective and what timeline they would recommend.