

THE PEW CHARITABLE TRUST'S COMMENTARY
***ON THE REVISED CONSOLIDATED TEXT: DRAFT REGULATIONS ON
EXPLOITATION OF MINERAL RESOURCES IN THE AREA,
DATED 29 NOVEMBER 2024 (ISBA/30/C/CRP.1)***

Key

Black font, **red font**, and grey text-boxes are replicated from the Draft Regulations text.

Blue font represents commentary or edits proposed by The Pew Charitable Trusts.

[Regulation 73bis Underpayment of royalty

- 1. Where a royalty return shows any underpayment of royalties, the Secretary-General must demand payment from the Contractor within 7 Days.**
- 2. If no payment is received, the Authority shall add the payment due to the next period of royalty collection.**
- 3. Proper measures shall be taken against Contractors who do not pay the underpaid royalty in due time.]**

We support inclusion of DR73bis. We would suggest that **paragraph (3)** relates more consistently to the rest of the regulations e.g. by stipulating that any lack of payment is a breach of Contract that will trigger a regulatory response in accordance with DR103.