

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.

Section 8

Payments to the Authority

Regulation 83

Recording in Seabed Mining Register

1. All payment figures made by the Contractor to the Authority under this Part are publicly available.
2. **Details of [a]**All payments received by the Authority from Contractors shall be recorded in the Seabed Mining Register.

We support DR 83 but suggest the drafting of paragraph 1 should be amended to *“shall be made publicly available separately by both the Secretary-General and the Contractor”* to make it enforceable regulatory language. In making this proposal, we are presuming that the intention behind DR83 is to mirror the Extractives Industry Transparency Initiative, which requires both the mining company making a payment, and the authority receiving the payment, to publish the information about their payments separately. This allows the public and other stakeholders to reconcile between the two reports, with the purpose to avoid public monies going missing or unaccounted for.