

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 28<sup>TH</sup> 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](mailto:council@isa.org.jm).*

**1. Name of Working Group:**

Informal Working Group on Inspection, Compliance and Enforcement

**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 101

**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 101**

**Complaints relating to Inspections**

2. The ~~[Inspectorate]~~ [Compliance Committee] ~~[Council]~~ shall on the basis of the recommendations of the Commission, may take such reasonable action as is necessary in response to the complaint, in accordance with applicable ~~S~~standards and Code of Conduct.

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

We recall some delegations previously requested more detail as to the meaning of ‘reasonable action’ in paragraph (2). We agree that more detail is required. For a complaints procedure to be effective and fair, it needs to be underpinned by a well-defined policy, follow a standardized process with clear roles and responsibilities assigned, have data and complainant confidentiality protections in place, and identify available pathways to remedy and recompense. As such, we agree with the inclusion of a Standard here.

As a general comment - steps should also be taken to ensure the Compliance Committee is not hearing and dealing with complaints that pertain to its own actions, direction and decisions.