

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 28TH 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.

1. Name of Working Group:

Open-ended Working Group on financial terms of a contract

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 75

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.

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

DR75 repeats matters already covered by Part XI on inspections. To have these repeated here is duplicative and may lead to conflicts, especially as DR75 is not currently reflective of roles and responsibilities allocated for inspectorate functions.

We suggest that the majority of DR75 should be deleted, as redundant, and could be amended to read: “The Council or Compliance Committee may request an audit of the Contractor’s records, which shall be undertaken at the Contractor’s sole cost.”

This regulation could also be bracketed until further progress has been made on DR99.