

**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.**

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**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.**

The Council [shall, ~~based on the recommendations of the Commission, apply the provisions of this Part in on a transparent, uniform and non-discriminatory basis manner, and~~] shall ensure equality of financial treatment [and comparable financial obligations for Contractors] ~~[to counter any disparity arising out of any grossly incomparable concentration of given resources].~~

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

We recommend deletion of the first bracketed text as all parts of the regulations should be applied in a transparent, uniform and non-discriminatory manner; and this should be provided for in language already proposed in DR 1. It also seems unnecessary and likely inconsistent with UNCLOS to limit Council action based on recommendations of the LTC for this matter.

We recommend deletion of “*grossly incomparable concentration of given resources*”. We infer that this proposal is related to concerns about differences in quality and concentration of resource abundance in Indian Ocean vs Clarion Clipperton Zone for polymetallic nodules, which we recall the majority of member States already stating should not be factored into setting financial obligations.