

**TEMPLATE FOR SUBMISSION OF TEXTUAL PROPOSALS DURING THE 30<sup>TH</sup> SESSION:  
COUNCIL - PARTS 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(s) of Delegation(s) making the proposal:**

Republic of Nauru

**2. Please indicate the relevant provision to which the textual proposal refers.**

Regulation 23

**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.**

3. The Commission shall consider and [decide whether to] recommend to the Council ~~to that the Council~~ consent to the application for consent to transfer ~~[within 90 Days of the date it receives the application]~~ within 90 Days of the date it receives the relevant application. ~~[at its next available meeting, provided that the documentation has been circulated at least 30 Days prior to that meeting].~~

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

It unnecessary to link the Commission’s consideration and approval of matters or documents to its twice-yearly meetings. This could create undue regulatory delay for time sensitive matters and is unduly burdensome to both the Commission and Contractors.

Given the Commission only meets twice a year, there is a risk that the current proposed text in paragraph 3 will impose significant delays upon transfers.

The Commission should examine matters received by it within 90 days of its receipt to ensure there is no unnecessary delay in regulatory processes and given the Commission is empowered to work intersessionally.

We do note the concerns expressed by other members regarding the imposition of prescribed time periods on the Commission in other regulations. This is something we need to consider across the regulations at an appropriate time as we aim to balance the need for an effective and efficient regulator with the constraints faced by existing institutional functioning and resourcing, and how this is to be addressed.

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