

**Friends of the President Group (United Kingdom)****Modification of a Plan of Work****Report on Intersessional Work (March-July 2026)**

1. **Summary:** The Friends of the President Group on Modification of a Plan of Work (the **Group**), facilitated by the United Kingdom, met on 30 April 2026 and finalised a revised textual proposal through subsequent email correspondence. The Group's work focused on addressing comments received during the first part of the 31<sup>st</sup> Council Session held in March 2026. The revised textual proposal relates to the Alt. 3 definition of Material Change, as well as Draft Regulations 57 and 92(1bis)(j). The revised textual proposal was submitted to the ISA Secretariat on 15 June 2026 for inclusion in the Revised Consolidated Text expected ahead of the second part of the 31<sup>st</sup> Council Session to be held in July 2026.
2. **Revised Textual Proposal:** The rationale for the revised textual proposal is contained in the Group's submission. To assist the Council in reaching a shared understanding of the modification process, the Group<sup>1</sup> has prepared a flow chart setting out the operation of the revised textual proposal for Draft Regulation 57. Please see attached (i) the Group's revised textual proposal and (ii) the flowchart of Draft Regulation 57.
3. **Next steps:** The Group considers the terms of Draft Regulation 57 to be well advanced and no longer a key outstanding issue. As such, the Group does not propose a further discussion of Draft Regulation 57 at the July 2026 Council meeting.
4. As indicated to the Council in March 2026, during the intersessional period following the Council's July 2026 meeting, the Group intends to focus on issues related to Draft Regulation 57, including the terms of Draft Regulation 58, Section 16 (Modification of terms and conditions of this Contract) of Annex X (Standard clauses for Exploitation Contract), and other Draft Regulations that interact with Draft Regulation 57.
5. The Group considers it useful ahead of undertaking further intersessional work to reiterate its understanding of a Plan of Work. The definition of a Plan of Work in the current Revised Consolidated Text is as follows:

**"Plan of Work"** means a Plan of Work for Exploitation in the Area, defined collectively as all and any plans or other documents setting out

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<sup>1</sup> With many thanks to Julian Jackson of The Pew Charitable Trusts for his expert IT skills.

the activities for the conduct of the Exploitation, which form part of, or is proposed to be part of, the Exploitation Contract.

This definition confirms that the Plan of Work is “part of” the (but not the entire) Exploitation Contract.

The Group further refers to the comments which accompanied its November 2025 textual proposal:

“Article 153(3) UNCLOS provides that a “plan of work shall [...] be in the form of a contract.” It is therefore clear that a Plan of Work forms part of an Exploitation Contract. This Draft Regulation [57] addresses modification of a Plan of Work (i.e. the plans and documents scheduled to an Exploitation Contract, as listed in Annex IX). Modification of other parts of the Exploitation Contract (i.e. the template at Annex IX and the Standard Terms and Conditions (STC) at Annex X) is addressed in Section 16 of the STC.”

The Group will consider whether further amendments are necessary to the definition of Plan of Work or to Annex IX to clarify the precise content of a Plan of Work.

6. **Key outstanding issues:** The Group takes this opportunity to highlight two issues which it considers to be key outstanding issues to be resolved by the Council:
  - **Authority working methods:** The Group wishes to reiterate the comments which accompanied its November 2025 textual proposal. The Group considers it inevitable that there will be changes to the ISA’s working modalities when regulating exploitation activities, in particular the working modalities of the LTC and the Council. New modalities may include the use of virtual meetings and written procedures. This is an important cross-cutting institutional issue. The Group respectfully recommends that the Council consider this key outstanding issue.
  - **Stakeholder consultation:** The Group notes that debate is ongoing within the Council regarding the requirements for Applicant and Authority Stakeholder consultation on an application for a Plan of Work – we consider this to be a key outstanding issue which requires resolution. Once resolved, it may be appropriate for the Group to reconsider the drafting in Draft Regulation 57 to ensure it reflects the position agreed by the Council.

**Attachment 1 – Revised Textual Proposal**

*[see separate document]*

**Attachment 2 – Flowchart of Draft Regulation 57**

*[see separate document]*