Isle of Man Government

DIGITAL ISLE OF MAN

CONSULTATION PAPER

Data Asset Register Fees

Isle of Man

Proposed Fees | Basis for Fees

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1. Introduction

The Department for Enterprise is establishing the Data Asset Register ("the Register"), the statutory register of data assets provided for by the Foundations (Amendment) Act 2026 ("the Act"). The Register will record registered data assets and confer the title that gives a data asset its standing as personal property under Manx law. The substantive provisions of the Act will come into operation on the date or dates appointed by order. The Act enables the Department to make regulations for the establishment, maintenance, operation and public accessibility of the Register, including the fees payable in respect of the registration of data assets and other services of the Registrar, and provides that the Registrar may charge the fees so prescribed.

By way of context, the data asset foundation regime seeks to establish a clear and credible legal framework under which data can be recognised, managed and used as an asset. It is designed to support wider economic opportunities for the Island, including the development of new professional, legal, financial, technical and digital services.

The data economy across the EU27 and the United Kingdom was forecast to be worth approximately €817 billion in 2025[1], and jurisdictions that provide legal certainty, trusted infrastructure and an appropriately skilled workforce will be better placed to benefit from its continued growth. By developing the regime, the Island has an opportunity to build new capabilities, attract investment and position itself at the forefront of the data economy. This paper sets out the fees the Department proposes to introduce for the Data Asset Register, the reasoning behind them, and how they would apply. It invites views before the fees are finalised through the Data Asset Register (Fees) Regulations. No final decision has been taken. The Department is consulting before the Regulations are laid precisely so that the fee framework can be shaped by the responses it receives, and it expects that responses may lead it to change what is proposed here. The fee levels proposed in this paper — in particular the proposed Annual Register Fee of £15,000 — are genuinely provisional. They remain subject to the input received through this consultation, to the outcome of the platform procurement and to greater certainty over the supplier cost base, and they will be confirmed or revised in light of all three before the Regulations are laid.

This consultation concerns the fees payable to the Registrar in connection with the Register. Those fees are charged per registered data asset. Fees relating to the establishment and continued existence of a Data Asset Foundation as a legal entity are a separate matter, set under the Foundations Regulations, and are not the subject of this paper.

2. What the fees pay for — and what they do not

The Register is a constitutive register. It creates and records a right. It is not a supervisory body, and it is not an assurance body. Being clear about that boundary is

[1] The European Commission's European Data Market Monitoring Tool gives a precise forecast of €816.807 billion, equivalent to approximately 5.2% of combined GDP

essential to understanding the fees, because it determines what the Office of the Registrar does, and therefore what the Department is charging for.

The Office of the Registrar

The first and most visible part of the function is the register itself. The Office of the Registrar admits a data asset to the Register on application, and creates the register record that constitutes the right. It then maintains that record as a live and authoritative statement of title across the life of the asset, recording the events that affect it, including amendments, transmissions, structural events and terminal events, and verifying the cryptographic integrity of the registered asset state, so that the record can be relied upon as an accurate account of what was registered and of every change since. It provides access to the Register at the applicable access level, and issues the searches, extracts, certificates and Data Asset Passports through which a registered asset's status can be presented to a counterparty.

Behind that sits the platform on which the Register runs, together with its hosting, its security, its resilience and its supplier support. A statutory register of property rights must be available, accurate and secure continuously, not merely most of the time, and the cost of holding it to that standard does not fall away between transactions.

The part of the function that is least visible, and most easily undervalued, is the standard setting and practice work that makes the Register usable at all. A register of data assets is only as good as the shared vocabulary in which assets are described. The Office of the Registrar therefore publishes and maintains the Register's practice materials, including the practice directions and guidance notes that tell registrants and their advisers how the Register works and what is expected of them; the data dictionary and the schemas that define how an asset, its boundary and its lifecycle events are to be expressed; and the guidance and worked practice that accumulate as the Register encounters cases its rules did not anticipate. This body of material is not written once. It has to be kept current as practice develops, as the standards on which the Register depends evolve, and as the Register's records must remain interoperable with the wider data economy the regime is intended to serve. Keeping a register aligned with emerging international standards is continuous work, and it is work that every registrant benefits from whether or not they ever call upon it in a given year.

Policy and the underlying architecture of the regime are developed by the Department rather than by the Office of the Registrar, and the Registrar's publications are operational: they explain, define and give practical effect to the framework rather than setting it. That is a division of function, not a division of cost. The framework has to be designed, maintained and kept fit for purpose for the Register to exist and to go on being worth registering in, and the cost of doing so is as much a cost of the Register as the cost of the platform it runs on. It is accordingly part of what the fees are set to recover, and section 3 treats it as such.

What the Registrar does not do

The Registrar does not verify the truth of the provenance information submitted to it, and does not provide assurance over the underlying data. Verification and assurance rest with accredited assurance providers, and responsibility for the provenance framework and its standards rests with the Data Asset Foundation's Council. The Registrar records what is submitted to it and vouches for the integrity of the record, not for the accuracy of the underlying claims. No fee in this paper is a charge for assurance, and no fee should be read as implying that the Registrar performs that function.

The Registrar likewise exercises no supervisory function over how data is used, or over the data protection characteristics of a registered asset. Those remain matters for the data controller and for the Information Commissioner.

3. The basis on which the fees have been set

The Department's starting point is that the cost of operating the Register should fall on those who use it, rather than on public funds. That is the discipline on which registries are conventionally funded, and it is the basis of the fees proposed here. The fees are also intended to be proportionate to the Registrar's function, transparent, straightforward to apply and sustainable over the longer term. In developing them the Department has had regard to recognised good practice for statutory fee setting.

It is also worth recalling what that cost buys and where demand for registration is expected to arise. Registration constitutes a data asset as personal property under Manx law: it gives the asset a title that can be searched, relied upon, dealt with and secured. That certainty is what allows a registered asset to be used — in transactions, in financing and as the foundation of longer-term commercial arrangements — in ways that an unregistered dataset cannot be. The Department expects the majority of registrants to be international participants, many of whom may initially be based outside the Island. The fees in this paper should therefore be considered not only in light of the cost of operating the Register, but also in light of the commercial opportunities and legal certainty that registration is intended to provide.

Three features of the Register's cost base shape the fee structure and should be stated plainly.

First, the cost of operating the Register is largely fixed and largely recurring. The platform, its hosting, security, resilience and supplier support, and the standing Registrar function, must be maintained continuously and at a defined standard whether the Register holds ten assets or two hundred. Only a modest part of the cost varies with the number of registrations processed.

Second, the Register must be built and stood up before it can carry any registrations at all. The one-off cost of building the platform, and the operating cost of the early years when few assets are registered, cannot be recovered from the small number of assets registered in that period without setting an opening fee that no one could sensibly pay. Those costs are instead carried forward and recovered as the Register grows.

Third, a statutory register of this kind cannot be established once and then left unchanged. A register recording title to data assets must continue to reflect the standards, interoperability requirements and security expectations of the market it serves, particularly as the data economy develops. It must also adapt to changes in the ways registered assets are used. Ongoing development is therefore not an optional enhancement: a register that failed to evolve would, within a relatively short period, cease to provide the certainty that is its principal purpose. The cost of that development must accordingly be treated as part of the cost of operating the Register, rather than as a separate expense.

It follows that fee income and operating costs will not, and are not intended to, balance in each individual year. In its early years, the Register is expected to operate at a deficit, principally because of the initial cost of establishing the platform. Two milestones should be distinguished in what follows. The first is the operating break even point: the point at which recurring fee income covers the annual cost of operating the Register. On the Department's central planning assumptions, this is expected to occur once approximately 50 to 60 assets have been registered, and potentially earlier when income from optional services is taken into account. The second, later milestone is the full recovery point: the point at which the surpluses generated after operating break even have also repaid the initial build cost and the deficits of the early years. Only at that second point has the Register recovered the cost of its establishment, and it is that point, not the first, which triggers the review described in section 6. Between the two, surpluses are applied to recovery; beyond the second, they fund the Register's continuing development.

What the fees are set to recover

The Department proposes that the fees be set to recover the full cost of the Register, understood as comprising four things.

The first is the recurring cost of operating it: the platform, its hosting, security, resilience and supplier support; the standing function of the Office of the Registrar, including the practice materials and standards work described in section 2; and the Department's own standing function in maintaining the framework within which the Register operates and keeping it aligned with developing law and international standards.

The second is the one-off cost of establishing the Register — not only building the platform, but designing the regime and its architecture — recovered over the medium term rather than charged in full to the first registrants.

The third is the deficits of the early years, when the standing cost of the function must be carried by a small number of registered assets.

The fourth is continued investment in the Register: the development of the platform and its services, and the maintenance of a reserve sufficient to meet the security, resilience and re-accreditation obligations that a statutory register must sustain indefinitely.

Two points follow from this. The cost of the Register is not the same as the cost of the Registrar: it includes the cost of designing and maintaining the framework, wherever within Government that work is done. And the fees are not a charge for a set of transactions. They are the means by which the Register, as a standing institution with a platform, an office, a body of practice and a framework behind it, is paid for by those who use it rather than by the public.

This is the basis on which the Island already funds its statutory registers. The Department for Enterprise operates the Central Registry, the Ship Registry and the Civil Aviation Administration, and the income from those registers meets the cost of running them and contributes to the cost of the Department. Their income and expenditure are published each year, division by division, in the Isle of Man Budget. The Department is not proposing anything novel in principle for the Data Asset Register; it is proposing to fund it in the way the Island funds its other registers, and to be transparent about doing so.

The Department's intention is that fee income should be applied to the Register and its services rather than treated as general revenue, and it is considering the mechanism through which that intention can best be given effect and made visible. Views on that mechanism are invited.

It follows that the fees proposed here are not fixed for the long term. As the Register grows, its cost is spread across a larger number of registered assets, and the Department's objective is that the fees should fall as that happens. That is stated as an objective rather than a guarantee, for reasons explained in section 6. Section 6 also sets out how the Department will test it and report against it.

What continued investment is expected to fund

The following provides an indication of the development that the Department currently expects the Register to require. It is included to help respondents understand how registrants' fees may be used. The programme described is indicative rather than a firm commitment and will be shaped by market needs and by experience gained through the operation of the Register.

A significant proportion of this investment is expected to support interoperability. The Department intends to implement open standards, including DCAT 3, ODRL and, as it matures, DPROD. This will enable descriptions of registered assets, and the rights attaching to them, to be machine-readable and interoperable with registers and marketplaces beyond the Island. The Department also expects the Office of the

Registrar to extend and maintain the relevant data dictionaries and schemas as those standards develop.

Investment will also support machine access to the Register. This is expected to include API and machine-to-machine access at each relevant access level, enabling registered assets to be relied upon in automated transactions rather than only through manual searches. It will also support integration with the marketplace and financing infrastructure through which registered assets are expected to be used.

The remaining investment will support the integrity, security and resilience of the Register itself. The Department expects to extend the scope and sophistication of the Register's verification agent so that the integrity of registered asset states can be continuously assured across a wider range of asset types and change events. It also expects to develop the Data Asset Passport and the revocation infrastructure needed to ensure that counterparties can rely on it. In addition, continued investment will be required for penetration testing, re-accreditation and resilience measures of the kind that a register of property rights must maintain on an ongoing basis.

The Register remains at an early stage, and its full cost base will not be known until a platform supplier has been appointed. The figures set out in this paper are therefore indicative consultation figures. They are based on current planning assumptions about the recurring cost of operating the Register and the number of assets likely to be registered during its early years.

> **Indicative figures:** On the Department's current planning assumptions, the recurring cost of operating the Register is modest in the first year (approximately £200k) and builds as the function is established. The Annual Register Fee is set so that a Register of approximately 50 to 60 assets meets its own recurring operating costs, with income from optional services potentially bringing that point forward. Beyond that point, each further registration contributes first to recovering the establishment cost and the deficits of the early years, and thereafter to the Register's continuing development and to the objective that the fees should fall. Those assumptions will be tested through this consultation and reviewed once there is greater certainty about actual costs, early uptake and income from optional services. The detailed cost model — including the establishment cost, the allocation of shared costs and the uptake scenarios — will be published when the Regulations are laid, once a platform supplier has been appointed

4. Proposed fees

Provisional registration fee (one-off)

A one-off registration fee is payable on provisional registration of a data asset. It covers the admission process: the work required to assess the application, examine the asset boundary and create the register record that constitutes the right. It is payable once, on admission. It is not payable again.

The registration fee is tiered across three levels. The tiers reflect the extent of the Registrar's work in admitting different kinds of asset to the Register. That work is not uniform. Admitting some assets is a straightforward examination; admitting others takes materially longer, and the fee is tiered so that the cost of that difference falls on the applications that cause it rather than being spread across all registrants.

Three factors principally drive that difference, and they are the factors by which the tiers are defined. The first is the completeness of the application and of the asset boundary. A single source asset with a simple, stable boundary can be examined quickly. A compound asset drawing on multiple sources, or one whose boundary is more difficult to draw and to record with precision, requires substantially more examination before the Registrar can be satisfied that the application is complete and that the register record will accurately constitute the right.

The second is the accreditation report. The report of the accredited assurance provider must be examined for completeness and for consistency with what is being registered. The more complex the asset, and the more extensive the assurance it carries, the more there is to examine — not to second guess the provider's judgement, which is not the Registrar's function, but to satisfy the Registrar that the report is complete and that it corresponds to the asset presented for admission.

The third is deployment of the verification agent. The Register's verification agent must be configured for each registered asset, so that the integrity of that asset's state can be continuously verified once it is on the Register. For a simple asset this is largely standard. For a complex asset — more sources, more change events, a richer set of rules governing what may be amended and on what ground — the verification logic must be specified and deployed for that asset, and that is engineering work of a different order.

In indicative terms, and subject to the detailed criteria to be set out in the Register's practice materials, the three tiers are as follows:

Tier 1 standard asset. A dataset that comes from one place and is straightforward to describe: it is clear what is in it, what is not, and where it came from. An example would be a customer database maintained in a single system, or a set of sensor readings collected from one network. Assets of this kind can be examined and admitted using the Register's standard checks.

Tier 2 composite or multi-source asset. A dataset built from more than one source, or one whose contents are harder to pin down precisely. An example would be a dataset combining sales records from one system with customer service records from another or research data gathered from several sites. Before an asset of this kind can be admitted, the Registrar must spend more time establishing exactly what is being registered, examining the more extensive assurance report that accompanies it and adapting the Register's automated integrity checks to fit the asset.

Tier 3 complex or compound asset. A dataset drawing on many sources, or structured in layers, often changing frequently and one that has been transformed. An example would be a machine learning training corpus assembled from many licensed sources and updated on a rolling basis, or a portfolio wide dataset combining feeds from many suppliers on different terms. Admitting an asset of this kind is a substantial exercise - its

boundary must be worked out and recorded with real precision, its extensive assurance examined in detail and the Register's automated integrity checks purpose built for it.

The applicable tier will be determined by the Registrar on application, based on clear guidelines, and provision for the review of an assigned tier will be made in the Regulations.

The tiers are therefore defined by the work required, and the criteria will be set out in the Register's practice materials by reference to the asset boundary profile. The Registrar exercises no supervisory judgement about the data itself, and the Department does not propose to charge more for registering an asset on the ground that its content is more sensitive. It is nonetheless to be expected that assets carrying the most extensive assurance and the most complex verification requirements will tend to fall in the higher tiers, because those are the assets that take the most work to admit.

Provisional registration is not open-ended. The Data Asset Register Regulations will provide for a maximum provisional period within which an asset must proceed to full registration. No Annual Register Fee is payable while an asset remains provisionally registered; that fee becomes payable on full registration.

Annual Register Fee

An Annual Register Fee is payable for each fully registered data asset, on full registration and annually in advance thereafter.

This fee is not a repeat of the registration fee, and it is not a periodic re-examination of the asset. It is the charge for the continued operation of, and continued access to, a live statutory register. What it pays for is the standing capability that keeps the Register in existence across the year: the platform and its hosting, its security, resilience and supplier support, the continuous verification of the integrity of registered asset states, the administration of the register record and of the events affecting it, including re-accreditation reports, and the standing Registrar function itself. It is the ongoing service, not the one-off admission step.

The two fees are accordingly charges for different things — one for admission to the Register, the other for the operation of the Register — and the annual fee is the larger of the two because the standing cost of operating a secure, resilient, continuously verified statutory register across a year is substantially greater than the cost of admitting a single asset to it.

The Annual Register Fee is uniform across all registered assets. It is not tiered, because what it pays for — the operation of the Register and access to it — does not vary with the complexity of any individual asset. The complexity of an asset is reflected where it arises: at admission. Configuring the verification agent for a complex asset is one-off work, charged once through the tiered registration fee. The continuous operation of the configured agent thereafter, like the operation of the Register itself, does not vary materially between assets, and the annual fee is uniform for that reason.

By way of background, the fee is charged per registered asset, rather than per foundation, in the interests of fairness between registrants. Some foundations may register a single asset while others may register a large volume of them, and a per foundation charge would require the former to subsidise the latter. Charging per asset also reflects what the Register actually maintains - each registered asset has its own register record, its own lifecycle events and its own continuously verified state, and each therefore draws on the Register in its own right. The charge follows that use.

The Department recognises that a per asset annual charge bears on the economics of registering more than one asset, and that it may influence both early take up and the way asset boundaries are drawn. Rather than settle those questions by assumption, this consultation seeks input on them directly, including on whether an introductory annual fee during the launch period, transitional pricing, or stepped charges where a foundation registers multiple assets would better support adoption.

Keeping the fees in step with costs

The Department proposes that the fees be increased each year in line with the Isle of Man Consumer Price Index for the preceding September, in the same way as other departmental fees and charges. Indexation is not an increase in real terms: it holds the fees steady against the cost of operating the Register, which is largely a cost of people and of supplier contracts. Without it, the fees would fall in real terms year by year and would have to be corrected by larger, less predictable adjustments. Indexation is, however, a default rather than a commitment, and it is subordinate to the reviews described in section 6. The annual review may override or disapply indexation in any year in which growth in registrations, lower operating costs or income from optional services supports holding or reducing the fees, and a review may reset the fees in either direction. Indexation then holds the reviewed level steady in real terms, keeping the reviews focused on the questions that matter — recovery and reinvestment — rather than on inflation.

Optional services

Beyond registration and the Annual Register Fee, the Registrar offers a range of optional services, for example, the issuance of a Data Asset Passport, certified copies, official extracts and register searches. These are used at the registrant's election and are priced individually, so that those who do not use them do not pay for them. Ordinary public inspection of the Register at the applicable access level is free of charge; the services listed here provide certified or evidential outputs beyond that inspection.

The event-based fees cover the lifecycle events described in section 2. Amendments, transfers and transmissions are charged per event at the amounts set out below. Structural events — the division, consolidation or reorganisation of registered assets — result in one or more new register records, and are charged at the registration fee for the applicable tier in respect of each resulting asset. Terminal events attract no fee.

Marketplace integration is the work of connecting a registered asset, at the registrant's request, to an approved marketplace or financing platform, so that the asset's registered status and its Data Asset Passport can be relied upon there. It is charged at a fixed fee together with the third-party costs actually incurred.

Where a valid data subject rights request requires a change to a registered asset, giving effect to that request is a recognised ground for amendment of the asset. In that event the Registrar's role is limited to recording the amendment and verifying the integrity of the amended asset state. Whether a request is valid is a matter for the foundation as controller; it is not determined by the Registrar. Consistent with a data subject's entitlement to exercise those rights without charge, save where a request is manifestly unfounded or excessive, no fee is proposed for an amendment made on that ground.

Summary of proposed fees

Registration and the Annual Register Fee:

Fee	When it applies	Proposed amount
Registration — Tier 1 (standard asset)	Once, on provisional registration	£5,000
Registration — Tier 2 (composite or multi-source asset)	Once, on provisional registration	£7,500
Registration — Tier 3 (complex or compound asset)	Once, on provisional registration	£10,000
Annual Register Fee	On full registration and annually in advance thereafter, per registered data asset	£15,000

Optional and event-based services:

Fee	When it applies	Proposed amount
Amendment giving effect to a data subject rights request	Per request	Nil
Passport revocation	Per event	Nil
Voluntary or provisional removal	Per event	Nil
Simple removal handling	Per event	Nil
Standard Verification Agent monitoring	Per registered asset	Included in the Annual Register Fee

Transfer of a registered data asset	Per transfer	£500
Transmission of a registered data asset (by operation of law)	Per transmission	£500
Structural event (division, consolidation or reorganisation)	Per resulting asset	Registration fee at the applicable tier
Asset amendment (other than on a data subject rights ground)	Per amendment	£500
Data Asset Passport issuance	Per credential	£500
Data Asset Passport re-issue	Per credential	£350
Access level change (Level 1, 2 or 3)	Per change	£500
Provenance certificate or official register extract	Per certificate	£250
Official priority search	Per search	£100
Marketplace integration	Per integration	£1,000 plus recoverable third-party costs
Late payment of the Annual Register Fee	Per late payment	£250

Administrative provisions

The Regulations will deal with the administrative incidents of the fees, including invoicing and due dates, proration and refunds, the treatment of applications that are withdrawn or do not proceed to full registration, review of an assigned registration tier, the treatment of VAT, and the notice and waiver provisions attaching to the late payment charge. Recoverable third-party costs will be actual, evidenced costs passed through without markup, notified in advance and, above a threshold to be set in the Regulations, subject to the registrant's prior consent. Comments on any of these matters are welcome.

5. Payment and non-payment

The Department invites views on what should follow if an Annual Register Fee is not paid. A late payment charge is proposed above; it is a fixed administrative charge rather than a penalty, and the substantive consequence of prolonged non-payment is the recovery of the debt itself. Beyond that, the Department's clear position is that non-payment of a fee should not of itself extinguish or impair a registered right: title is constituted by registration, and the Department does not propose that a property right be lost through

a payment default. It proposes instead that the consequences of prolonged non-payment be dealt with through the recovery of the debt and, where appropriate, the suspension of some of the services, including publicly searchable index and Data Asset Passport validity, rather than through any effect on the register record itself.

Any suspension of the services or of Passport validity would be subject to safeguards set out in the Regulations, including formal notice, a reasonable period to pay, and restoration immediately upon payment, with the status of the asset clearly shown so that third parties are not misled. The Department recognises that suspension of searchability or of Passport validity, while leaving the registered right intact, may affect the practical use of the asset in the meantime. Views on that consequence, and on the approach as a whole, are specifically invited.

6. Reviewing the fees

The Department will review the fees after the Register has been operating for twelve months, and annually thereafter. Each review will compare fee income against the Register's actual operating cost, against the investment being made in the Register, and against the recovery of the build cost and the early year deficits. It will assess whether the fees remain fair, proportionate, transparent and sustainable.

The first review will take account of actual platform, hosting, security, resilience and supplier support costs; the actual cost of the standing Registrar function; the number of registered data assets; income from optional services; the development programme the fees are funding; and consultation feedback on affordability and adoption.

A review on reaching the recovery point

A review that happens only on a fixed calendar is of limited value, because what changes the picture is not the passage of time but the growth of the Register. The Department therefore proposes that, in addition to the periodic reviews, a review be required as soon as the Register reaches the full recovery point described in section 3 — the point at which it has recovered the cost of its establishment and the deficits of its early years.

That point is the natural moment to take stock. Up to it, the fees are doing the work of repaying what it cost to build the Register and to carry it while it was small. Beyond it, what the fees are asked to do changes: they meet the cost of operating and developing the Register rather than the cost of establishing it. The review at that point will therefore examine, and publish, three things: the actual cost of operating the Register; the investment programme the fees are funding, and what that programme has delivered; and the position on recovery. It will then set the fees at the level required to sustain and develop the Register from that point forward.

The Department invites views on where the trigger for that review should sit — whether on the recovery position, on a defined number of registered assets or on some combination of the two — and on whether the trigger should be written into the Regulations themselves rather than stated as policy.

The Department's objective on the level of the fees

The Department's objective is that the fees should fall as the Register grows and its cost is spread across a larger number of registered assets. It is stated as an objective and not as a guarantee, and the Department wishes to be candid about why. It cannot responsibly commit in advance to a reduction whose size and timing depend on evidence it does not yet have: the actual cost of operating the Register once a platform supplier is appointed, the pace at which assets are registered, the cost of the development the market turns out to require, and the reserve that a statutory register of property rights prudently needs to hold. A promise made now, on assumptions, would be worth less than the discipline of testing it against the facts.

What the Department can commit to is that discipline. At each review it will publish the cost of operating the Register, the investment programme the fees are funding and the position on recovery, and it will state what it has concluded about the level of the fees and why. Where the evidence supports a reduction, the Department will make one. Where it does not, the Department will explain why not, and those who pay the fees will be able to see the basis on which that conclusion was reached and to challenge it.

A published Funding Model

So that this can be seen and tested rather than simply asserted, the Department proposes to publish a Funding Model for the Register, and to maintain it. The Department regards the Funding Model as a governance safeguard, not a courtesy: it is the instrument through which those who pay the fees can see, and test, how their money is applied. It would set out the principles on which the fees are set and the cost base of the Register, and it would show transparently how fee income is applied across the four calls on it — the operating cost of the Register, its continuing development, the reserve it prudently holds, and the recovery of its establishment cost and early-year deficits — together with the position against each of the two milestones described in section 3. It would be updated at each review. The Isle of Man Financial Services Authority publishes a document of this kind alongside its own fees, and the Department considers the same discipline appropriate here: those who pay the fees should be able to see what the fees are paying for, and to hold the Department to what it has said.

Where fee income falls below operating cost, or where the fees appear to be affecting adoption, the Department will equally consider whether change is needed. Any change to the statutory fees would be made by amending Regulations, subject to the usual Tynwald process.