DEPARTMENT FOR ENTERPRISE
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Data Asset Register Fee Consultation

Summary of consultation and Department responses

October 2026



Isle of Man Government
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1. Introduction

The Department for Enterprise consulted on the proposed fee framework for the Data Asset Register.

The consultation sought views on how the Register should be funded, the approach to cost recovery and continued investment, the objective for fee levels over time, the use and transparency of fee income, review mechanisms, the proposed charging basis, registration and annual fee levels, measures to support early adoption, optional service fees and the treatment of non payment.

A total of 9 responses were received through the Consultation Hub.

This document summarises the responses received and sets out the Department's responses.

2. About the consultation

The consultation ran from 16 July 2026 to 13 August 2026.

It asked respondents to provide views on the proposed fee framework for the Data Asset Register.

- funding, cost recovery, continued investment and the use of fee income
- review arrangements, CPI indexation and publication of the Funding Model
- the charging basis, registration and annual fees, early adoption measures, optional services and non payment

3. Who responded

There were 9 responses to the consultation.

- 7 respondents answered on behalf of an organisation and 2 responded as individuals.
- 5 respondents agreed that their response could be published in full, 2 agreed that their response could be published anonymously, and 2 asked that their response should not be published.
- 8 respondents agreed that they could be contacted if clarification was required and 1 asked not to be contacted.

Responses marked not for publication have been considered in the analysis but are not quoted, reproduced or attributed. Restricted material informs only generic, aggregated themes. No respondent names, organisations or identifying details are included in this document.

4. How responses have been considered

All responses received have been considered. The responses have been reviewed and summarised by consultation question, taking account of both the selected answers and written comments.

The response tables indicate the level of support or concern. Written comments have been considered alongside the selected answers to reflect the reasons given and the range of views expressed, including minority views.

Where respondents raised points that applied across more than one question, those points have been addressed under the most relevant question or in the cross cutting themes.

This document does not reproduce every comment received. It summarises the main points raised and sets out draft Department responses, including areas requiring clarification or further consideration.

5. Summary of feedback

The selections showed strong support for staged cost recovery, continued investment from fee income, applying income to the Register and its services, a published Funding Model, separate optional service pricing and temporary support for early adoption. Written comments qualified some of that support, particularly the scope and pace of recovery and the impact on early participants.

The strongest numerical concern was the proposed £15,000 Annual Register Fee per asset, which seven of nine respondents considered too high. No respondent selected that all three registration fees of £5,000, £7,500 and £10,000 were proportionate. Four considered them too high, three considered some proportionate and two were unsure.

Feedback linked fees to market formation, portfolio registration, accurate asset boundaries and wider economic benefits. Seven respondents favoured a review trigger combining recovery and registration volume; six supported placing the trigger in Regulations. Comments sought clear cost evidence, reporting and safeguards for development, reserves and review decisions.

The consultation paper states that no final fee decision has been taken. The Department will carefully consider the feedback alongside procurement and updated cost information before determining what should or can be incorporated into the final framework.

6. Responses by consultation question

6.1. Question 6: Funding the Data Asset Register

6.1.1. What we asked

Do you agree that the cost of establishing and operating the Register should be met by those who use it, rather than from public funds?

6.1.2. Response summary

Response option	Count	Percentage
Yes, I agree	2	22.22%
I mostly agree	6	66.67%
No, I disagree	1	11.11%
Unsure	0	0.00%

6 respondents provided additional comments on this question.

6.1.3. What respondents said

Most respondents agreed or mostly agreed with the principle that users should contribute to the cost of the Register.

Comments distinguished ongoing operating costs from the costs of establishment and early market development. Suggestions included recovering establishment costs over a longer period and considering initial public funding rather than placing the full cost on early registrants.

Respondents raised the effect of opening fees on participation and the wider economic benefits for the Isle of Man. Comments also linked a larger base of registrants to more sustainable income.

Department response

The Department welcomes the broad support for the principle that the cost of operating the Register should ultimately be met by those who use it.

The Department notes the distinction raised between ongoing operating costs and the costs of establishment and early market development. The starting point is that users should fund the Register. The proposed approach recognises that establishment costs and early year deficits cannot reasonably be recovered immediately from a small number of early registrants and are instead intended to be recovered progressively as the Register grows.

The feedback on the timing and balance of recovery, the potential role of initial public funding, participation and wider economic benefits will be carefully considered. No final decision has been taken on the proposed fees. The Department will consider what should or can appropriately be incorporated into the final framework alongside the procurement outcome and greater certainty over costs.

6.2. Question 7: Funding the Data Asset Register

6.2.1. What we asked

If you consider that some costs should be met from public funds, please tell us which costs and why:

6.2.2. Response summary

7 respondents provided comments.

6.2.3. What respondents said

Suggestions included public funding for some initial build, launch and early development costs, as well as staffing and marketing. Comments linked this support to establishing the market and delivering wider economic benefits.

Respondents proposed support for early operating deficits or time or volume limited fee incentives to help the Register reach operating break even. Some questioned whether establishment and market development costs should be recovered from registrants at all.

An alternative view was that all costs should ultimately be recovered, but over a longer period.

Department response

The Department welcomes the feedback on which costs might appropriately be met from public funds and the reasons provided.

The proposed approach is to recover the full cost of the Register over time, while recognising the need to carry establishment costs and early deficits as the Register grows. It also recognises the wider economic opportunities the regime is intended to support.

The suggestions on initial and transitional support, the treatment of establishment costs and the pace of recovery will be carefully considered alongside that proposed approach. The Department will determine whether, and to what extent, those suggestions should be incorporated into the final funding and fee framework.

6.3. Question 8: Long term stability and full cost recovery

6.3.1. What we asked

Do you agree with the approach in section 3 that fees should provide long term stability and certainty for users, while enabling the full cost of the Register (operating cost, build cost, early-year deficits and continued investment) to be recovered in stages over the medium term, rather than requiring income and cost to balance in each year?

6.3.2. Response summary

Response option	Count	Percentage
Yes, I agree	5	55.56%
I mostly agree	4	44.44%
No, I disagree	0	0.00%
Unsure	0	0.00%

6 respondents provided additional comments on this question.

6.3.3. What respondents said

All respondents selected agreement or qualified agreement with staged recovery over the medium term rather than requiring income and costs to balance in each year.

Comments supported long term stability but questioned the pace and scope of full recovery. Respondents emphasised allowing time for the market to develop, avoiding disproportionate pressure on early registrants and considering wider economic benefits.

A comment also questioned the relatively low planning figure of approximately 50 to 60 registered assets.

Department response

The Department welcomes the support for staged cost recovery and long term stability, and notes the qualifications raised about the scope and pace of recovery.

The proposed approach is to recover establishment costs and early deficits progressively rather than require income and expenditure to balance each year. Operating break even is distinct from the later point of full recovery. When these points are reached will depend on the approved fee structure, actual costs and registration volumes.

The comments on recovery periods, the costs to be recovered, early participation and the planning assumptions will be carefully considered as the final framework is developed. The Department will assess what should or can be incorporated in light of the consultation feedback and greater certainty over the cost base.

6.4. Question 9: Continued investment in the Register

6.4.1. What we asked

Do you agree that continued investment in the Register should be funded from fee income?

6.4.2. Response summary

Response option	Count	Percentage
Yes, I agree	4	44.44%
I mostly agree	5	55.56%
No, I disagree	0	0.00%
Unsure	0	0.00%

7 respondents provided additional comments on this question.

6.4.3. What respondents said

All respondents agreed or mostly agreed that fee income should contribute to continued investment. Comments linked future sustainability to growth in registrations, while suggesting that further public investment might be needed.

Respondents asked that development spending, cost recovery and reserves be separately explained. Suggestions included a defined development budget, a reserve target, publication of the forward programme for comment and reporting on delivery. Concerns were raised that spending decisions could postpone recovery and fee reductions.

Comments also questioned the burden on early adopters and the relationship between initial registration effort and subsequent monitoring costs.

Department response

The Department welcomes the support for continued investment from fee income and the suggestions on how that investment should be managed and explained.

Continued development and an appropriate reserve form part of the Register's proposed funding needs. The purpose is to maintain security, resilience and alignment with changing standards and market requirements. The proposed Funding Model would show how income is applied to operation, development, reserves and recovery.

The feedback on development budgets, reserve targets, the separation of recovery, engagement on future investment and the effect on launch fees will be carefully considered. The Department will also consider the comments on public support and the balance between admission and ongoing work before deciding what should be incorporated into the final funding arrangements.

6.5. Question 10: Continued investment in the Register

6.5.1. What we asked

Are there developments not listed in section 3 that you consider the Register should prioritise?

6.5.2. Response summary

7 respondents provided comments.

6.5.3. What respondents said

Suggested priorities included simple and commercially usable registration, sub assets, practical guidance, education, APIs, interoperability, international recognition and measures of uptake and economic impact. Some responses offered no further priorities.

Feedback also identified security interests and priority, enforcement and insolvency, notifications to interested parties, persistent identifiers and certified records of the Register at a past date.

Further suggestions concerned published criteria for approved marketplaces or financing platforms and recording third party attestations. Wider comments about guidance and education submitted under Question 14 are also reflected here.

Department response

The Department welcomes the suggestions on development priorities and the practical needs of those who may use or rely on the Register.

The indicative areas of investment include interoperability, machine access, marketplace and financing integration, the Data Asset Passport, verification capability, security and resilience. The Registrar's proposed role also includes maintaining practice materials, data dictionaries and guidance. The development programme is intended to be shaped by market needs and operational experience.

The additional suggestions on commercial use, financing, legal interfaces, notifications, identifiers, certification, recognition and guidance will be carefully considered when assessing priorities. The Department will determine what should or can be incorporated into the programme and supporting arrangements.

6.6. Question 11: The Department's objective on fee levels

6.6.1. What we asked

Do you agree with the Department's objective that fees should fall as the Register grows?

6.6.2. Response summary

Response option	Count	Percentage
Yes, I agree	6	66.67%
I mostly agree	1	11.11%
No, I disagree	2	22.22%
Unsure	0	0.00%

7 respondents provided additional comments on this question.

6.6.3. What respondents said

Most respondents agreed or mostly agreed with the objective that fees should fall as the Register grows. Comments linked reductions to a largely fixed cost base, increased participation and wider economic benefits.

Respondents sought clearer mechanisms and timing for reductions, and lower charges for additional assets within a foundation. Some favoured lower initial fees to help generate the growth needed to support the model.

The two respondents who disagreed preferred fees to be set fairly at a lower or sustainable level from the outset and applied consistently to later entrants, subject to inflation. Comments also distinguished the initial admission effort from subsequent annual work.

Department response

The Department notes respondents' support for fees reducing as the Register grows, alongside concerns about initial pricing and fairness between early and later participants.

The initial fee structure remains subject to approval. The proposed review arrangements would consider actual costs, registration volumes and the recovery position when assessing whether fees should change. No automatic reduction or timetable for reductions is being confirmed at this stage.

Feedback on starting fees, charges for additional assets and wider market development will inform consideration of the final fee structure and review arrangements.

6.7. Question 12: The Department's objective on fee levels

6.7.1. What we asked

Do you agree with the way the objective is expressed in section 6 — as an objective tested and reported against at each review, rather than as a guaranteed reduction?

6.7.2. Response summary

Response option	Count	Percentage
Yes, I agree	3	33.33%
I mostly agree	5	55.56%
No, I disagree	1	11.11%
Unsure	0	0.00%

7 respondents provided additional comments on this question.

6.7.3. What respondents said

Most respondents agreed or mostly agreed with testing and reporting against an objective rather than guaranteeing a reduction. Comments supported flexibility but asked for clear indicators and transparent assessment.

Suggestions included defined priorities for applying income, limits or targets for development and reserves, publication of the fee that the cost model would support, and an explanation of any difference from the actual fee. Respondents also proposed registration based review triggers.

Alternative views favoured fees that start and remain lower. Competitiveness with equivalent solutions in other jurisdictions was also raised as a consideration.

Department response

The Department welcomes the views on how the objective should be expressed and tested.

The proposed review arrangements would make the operating cost, investment programme and recovery position public at each review, together with the conclusion on fees and the reasons for it. This is intended to make the basis for decisions visible while allowing those decisions to reflect the evidence available.

The suggestions on measurable indicators, the allocation of income, development and reserve targets, supporting calculations and review triggers will be carefully considered alongside the comments on initial pricing and competitiveness. The Department will decide what should or can appropriately be incorporated into the final review and reporting arrangements.

6.8. Question 13: Use of fee income

6.8.1. What we asked

Do you agree that fee income should be applied to the Register and its services rather than treated as general revenue?

6.8.2. Response summary

Response option	Count	Percentage
Yes, I agree	7	77.78%
I mostly agree	1	11.11%
No, I disagree	0	0.00%
Unsure	1	11.11%

6 respondents provided additional comments on this question.

6.8.3. What respondents said

Most respondents supported applying fee income to the Register and its services rather than treating it as general revenue. Comments connected this approach to the credibility of cost recovery, fee reviews and the objective of reducing fees.

Feedback sought confidence that income would not fund unrelated Department activity and that shared costs would be transparent. An alternative suggestion was that costs and investment should be protected but profit could be available to general funds.

Another view was that the treatment of income is an internal accounting matter rather than a matter requiring a public ring fence.

Department response

The Department welcomes the support for applying fee income to the Register and its services and notes the different views on the treatment of any surplus.

The intention is for fee income to support the Register and its services. The consultation invited views on how this should be given effect and made visible. The cost of the Register includes the work needed to maintain the framework, wherever within Government that work is undertaken.

6.9. Question 14: Use of fee income

6.9.1. What we asked

What mechanism would give you the greatest confidence that fee income is being used to the Register and its services only?

6.9.2. Response summary

9 respondents provided comments.

6.9.3. What respondents said

Suggestions focused on published accounts or annual statements showing income, operating and development costs, public contributions, reserves, outstanding recovery and the resulting fee decision. Some proposed a separate account or a statutory ring fence, with independent scrutiny and reporting to Tynwald.

Respondents asked for the basis of shared cost allocations, actual spending against plans and closing balances to be visible. Other responses considered published accounts sufficient or did not propose a mechanism.

A wider submission also raised proportionality, service standards, registration times, early adoption, education and a first year review. These points are reflected here and under Questions 10, 25, 27 and 31.

Department response

The Department welcomes the suggestions for demonstrating how fee income is used and the wider observations on confidence in the regime.

The consultation paper proposes a published Funding Model and reporting at each review to show the cost base, use of income and recovery position. This supports the stated intention that fees should fund the Register and its services.

The Department will carefully consider the suggested accounting, legal protection, independent scrutiny and reporting mechanisms, including the treatment of shared costs and balances. The comments on service clarity and practical support will also be considered alongside the related responses in this document. The final arrangements will reflect what can appropriately give effect to the consultation's transparency objectives.

6.10. Question 15: Annual CPI indexation

6.10.1. What we asked

Do you agree that the fees should increase annually in line with the Isle of Man Consumer Price Index, so that they hold steady in real terms between reviews, subject to the annual review's ability to override or disapply indexation where the evidence supports holding or reducing the fees?

6.10.2. Response summary

Response option	Count	Percentage
Yes, I agree	4	44.44%
I mostly agree	2	22.22%
No, I disagree	3	33.33%
Unsure	0	0.00%

7 respondents provided additional comments on this question.

6.10.3. What respondents said

Six respondents agreed or mostly agreed with CPI indexation and three disagreed. Comments supported maintaining real value but asked that increases take account of growth, efficiency, other Government charges and international competitiveness.

Respondents questioned how indexation would interact with reductions of fees, and whether it should apply during the initial years before the starting tariff has been tested. An alternative was to use CPI as one input to an assessment rather than automatically applying it.

Practical suggestions concerned publishing fee changes in advance and using a clear rounding convention.

> Department response
>
> The Department welcomes the range of views on CPI indexation, including the comments on its interaction with the objective that fees should fall.
>
> The feedback on the initial years, the use of CPI within the wider assessment, competitiveness, advance publication and rounding will be carefully considered. The Department will determine what should or can be incorporated before the final approach is confirmed.

6.11. Question 16: Funding Model

6.11.1. What we asked

Do you agree that the Department should publish and maintain a Funding Model for the Register, setting out the cost base, the recovery position and the development programme the fees are funding?

6.11.2. Response summary

Response option	Count	Percentage
Yes, I agree	6	66.67%
I mostly agree	2	22.22%
No, I disagree	0	0.00%
Unsure	1	11.11%

6 respondents provided additional comments on this question.

6.11.3. What respondents said

Most respondents supported publishing and maintaining a Funding Model. Comments sought a clear relationship between fees, actual costs, registration assumptions, recovery and the development programme.

Suggestions included showing the fee supported by the cost model, reserve and recovery balances, the basis of shared cost allocations, and actual delivery and registrations against forecasts.

Other views favoured proportionate reporting or treated this as an internal accounting matter. Concerns included additional reporting cost and the risk that detailed publication could help competing jurisdictions copy the offering.

Department response

The Department welcomes the support for a published Funding Model and the feedback on its content and level of detail.

The suggestions on supporting calculations, balances and actual performance will be carefully considered, together with reporting cost and the concerns about commercial sensitivity and competition. The Department will determine what should be incorporated to provide useful and proportionate transparency.

6.12. Question 17: Reviewing the fees

6.12.1. What we asked

Do you agree with the review mechanism in section 6, in particular that a review should be triggered when the Register reaches the point at which its build cost and early-year deficits have been recovered?

6.12.2. Response summary

Response option	Count	Percentage
Yes, I agree	4	44.44%
I mostly agree	3	33.33%
No, I disagree	2	22.22%
Unsure	0	0.00%

6 respondents provided additional comments on this question.

6.12.3. What respondents said

Most respondents agreed or mostly agreed with the proposed review mechanism, but comments qualified the timing and basis of the trigger. Respondents sought evidence that reviews would genuinely reassess proportionality and support reductions where justified.

Feedback questioned reliance on full recovery because spending decisions and an establishment cost not yet finalised could postpone that point. Comments favoured the ability to review and reduce fees earlier where they restrict adoption.

Alternative views preferred lower or consistent fees from the outset. Comments also raised the risk that the prospect of later reductions could encourage businesses to delay registration.

Department response

The Department welcomes the feedback on the review mechanism and the circumstances in which fees should be reassessed.

The consultation proposed a review after twelve months of operation and annually thereafter, in addition to a review at full recovery. It also proposed considering whether change is needed where income falls below operating cost or fees appear to affect adoption. Full recovery is therefore not proposed as the only occasion for reconsidering fees.

The comments on earlier reviews, the effect of spending on the recovery point, evidence of proportionality and incentives for early participation will be carefully considered. The Department will decide what should or can be incorporated into the final review arrangements alongside the views on starting fee levels.

6.13. Question 18: Reviewing the fees

6.13.1. What we asked

Where do you consider the review mechanism trigger should sit?

6.13.2. Response summary

Response option	Count	Percentage
On the recovery position	0	0.00%
On a defined number of registered assets	1	11.11%
On some combination of the two	7	77.78%
Unsure	1	11.11%

6 respondents provided additional comments on this question.

6.13.3. What respondents said

Seven respondents selected a combination of financial recovery and registration volume, one selected a defined number of assets and one was unsure.

Comments described registration counts as observable evidence of adoption and the distribution of fixed costs. Suggestions included defined thresholds alongside recovery, or a review when either condition is reached rather than waiting for both.

Respondents also suggested considering the number of foundations and the likely retention of assets when assessing future income and sustainability.

Department response

The Department welcomes the clear preference for considering both the recovery position and registration volumes in the review mechanism.

The consultation distinguishes operating break even from full recovery and expressly invites views on a recovery trigger, an asset threshold or a combination. Both recovery and uptake are relevant to assessing the Register's development and the level of fees.

The suggestions on separate thresholds, which event should trigger a review first, and the use of participation and retention information will be carefully considered. The Department will determine how these measures should interact and what should be incorporated into the final arrangements.

6.14. Question 19: Reviewing the fees

6.14.1. What we asked

Do you think the review trigger should be written into the Regulations themselves rather than stated as policy?

6.14.2. Response summary

Response option	Count	Percentage
Yes, I do	6	66.67%
No, I don't	3	33.33%
Unsure	0	0.00%

6 respondents provided additional comments on this question.

6.14.3. What respondents said

Six respondents supported writing the review trigger into Regulations and three did not.

Supportive comments linked a statutory requirement to certainty, transparency and confidence that reviews would continue under future administrations. Suggestions distinguished the obligation to conduct and publish a review from the Department's discretion over the outcome and detailed method.

Other responses preferred policy flexibility, raised barriers to future change or disagreed with the proposed process.

Department response

The Department welcomes the views on whether the review trigger should be included in Regulations.

The current draft Regulations provide for review of the wider framework, including fees. The broader review through Tynwald would sit alongside close monitoring of the fee arrangements, particularly during the early operation of the Register.

The Department will consider whether changes are needed in light of operating experience, actual costs and registration volumes. A review would not automatically result in a change to fees, and any changes would remain subject to the required approvals.

6.15. Question 20: Charging per registered data asset

6.15.1. What we asked

Do you agree that registration and the Annual Register Fee should be charged per registered data asset rather than per foundation?

6.15.2. Response summary

Response option	Count	Percentage
Yes, I agree	1	11.11%
I mostly agree	3	33.33%
No, I disagree	4	44.44%
Unsure	1	11.11%

8 respondents provided additional comments on this question.

6.15.3. What respondents said

Views were mixed: one respondent agreed, three mostly agreed, four disagreed and one was unsure. Comments distinguished some support for a per asset unit from opposition to charging the same substantial annual amount for every asset.

Respondents raised portfolio costs, participation, incentives to consolidate or repurpose assets, and the relationship between fixed costs and incremental asset charges. Alternatives included a foundation based element, lower subsequent asset fees, tapered charges and annual caps. A foundation basis at launch was also proposed.

Wider comments concerned simplicity, international competitiveness and possible future use of structures beyond foundations.

Department response

The Department welcomes the feedback on the charging basis and notes the distinction between the per asset unit and the proposed rate applied to each asset.

Each asset has its own record, lifecycle events and verified state. The proposed charging basis links fees to that use and seeks to avoid a foundation with one asset subsidising one with many. The Department recognises that this approach may affect multiple asset registration, early uptake and asset boundaries, and is considering the alternatives raised.

The comments on fixed and incremental costs, portfolio charges, simplicity and competitiveness will be carefully considered before the basis is finalised. Wider suggestions on future structures will also be considered in the context of the regime's development. The present consultation concerns Register fees and does not determine fees for establishing a foundation as a legal entity.

6.16. Question 21: Charging per registered data asset

6.16.1. What we asked

If you think another charging base would be better, what would you propose?

6.16.2. Response summary

7 respondents provided comments.

6.16.3. What respondents said

Most substantive alternatives combined a foundation or first asset element with lower charges for additional assets. Suggestions included stepped portfolio pricing, a taper, a foundation level annual cap and removal of registration tiers.

Respondents proposed temporary launch arrangements, including a defined introductory period and a stated term before moving to the standard tariff. Some supplied illustrative rates, while noting that final calibration should follow cost evidence.

The intended benefits were greater participation, fairer treatment of multiple assets and fewer incentives to consolidate assets artificially.

Department response

The Department welcomes the alternative charging approaches and the explanations of how they might support participation.

The consultation paper recognises the effect that per asset charges may have on multiple asset registration and invites views on introductory fees, transitional pricing and stepped charges. Its proposed rationale remains to link charges to the records and services maintained by the Register.

The foundation based, tapered, capped and launch pricing options, together with the proposals on registration tiers, will be carefully considered against the cost base and the objectives of fairness, simplicity and sustainability. The Department will decide whether any of these approaches should or can be incorporated into the final model.

6.17. Question 22: Charging per registered data asset

6.17.1. What we asked

Do you think a per asset charge could discourage early adoption or lead foundations to define assets more broadly?

6.17.2. Response summary

Response option	Count	Percentage
It could discourage early adoption	3	33.33%
It could lead foundations to define assets more broadly	4	44.44%
Unsure	1	11.11%
Not Answered	1	11.11%

7 respondents provided additional comments on this question.

6.17.3. What respondents said

Three respondents selected discouraging early adoption and four selected broader asset definitions; one selected unsure and one did not select an option. Several comments identified both risks, including comments alongside an unsure or absent selection.

Feedback raised reduced scale and diversity, including for foundations operating without a profit motive. Respondents described incentives to consolidate, expand or repurpose assets to avoid recurring charges, potentially affecting record accuracy, workload and the use of assets in financing.

Comments also raised the cost of later correcting boundaries and suggested hybrid or discounted pricing. A different view was that a poorly defined asset would not suit the registrant's purposes and therefore did not present a significant risk.

Department response

The Department welcomes the feedback on early adoption and asset boundaries, including the different assessments of how significant these risks may be.

The Department recognises the risks to early adoption and accurate asset boundaries. The consultation sought views on introductory, transitional and stepped pricing. Accurately defining the asset boundary remains important, alongside the separate charges proposed for structural changes.

The comments on participation, diversity, commercial use, workload and the cost of correcting boundaries will be carefully considered together with the alternative pricing suggestions. The Department will determine what should or can be incorporated into the final charging arrangements and launch approach.

6.18. Question 23: Registration fee tiers

6.18.1. What we asked

Do you agree that the registration fee should be tiered according to the complexity of the asset and the extent of the work required by the Registrar to assess and admit it, using the three tier categories set out in section 4 (standard, composite or multi-source and complex or compound)?

6.18.2. Response summary

Response option	Count	Percentage
Yes, I agree	1	11.11%
I mostly agree	4	44.44%
No, I disagree	2	22.22%
Unsure	2	22.22%

7 respondents provided additional comments on this question.

6.18.3. What respondents said

Five respondents agreed or mostly agreed with registration tiers, two disagreed and two were unsure. Comments supported linking fees to work but sought objective criteria, predictable assessment and a transparent review mechanism.

Respondents questioned categorisation effort, the proposed fee levels and whether the difference between tiers reflects the actual work. Suggestions included a wider range, an additional or bespoke band, lower launch fees or a simpler interim approach while evidence is collected.

Feedback also questioned why complexity would affect admission fees but not annual monitoring charges.

Department response

The Department welcomes the views on tiering and the importance of clear and predictable criteria.

Feedback on the basis for registration fees and the relationship between charges and the Registrar's work will inform consideration of the final fee structure. No final decision has been taken, and the structure remains subject to the required approvals.

6.19. Question 24: Registration fee tiers

6.19.1. What we asked

If you could propose a different basis for the registration fee, what would it be?

6.19.2. Response summary

7 respondents provided comments.

6.19.3. What respondents said

Alternatives included a flat fee, payment split between application and admission, and a base fee with published charges for defined complexity factors. Some preferred existing tiers at lower launch rates or an interim flat arrangement while actual effort is assessed.

Further suggestions separated application quality and additional clarification work from asset complexity. Respondents proposed reductions for using standard schemas or verification templates, and scoped and capped quotations for bespoke work.

Feedback also proposed reduced charges for structural events that reuse work already undertaken. The common considerations were predictability, proportionality and a clear link to the Registrar's effort.

Department response

The Department welcomes the alternative registration fee designs and the suggestions for making charges more predictable.

The alternatives raised by respondents have informed consideration of a flat registration fee as part of a rebalanced structure with lower, tiered annual fees. This is an approach under consideration and has not been approved.

The Department recognises that a flat fee would simplify the registration tariff but would not reduce the cost of entry under the option being considered. The suggestions on staged payment, published components, application quality, use of standards, bespoke work and reduced charges for structural events will continue to be considered before the fee framework is finalised.

6.20. Question 25: Registration fee levels

6.20.1. What we asked

Are the proposed registration fees of £5,000, £7,500, and £10,000 proportionate?

6.20.2. Response summary

Response option	Count	Percentage
Yes, all three proposed fees are proportionate	0	0.00%
Some of the proposed fees are proportionate	3	33.33%
The proposed fees are too high	4	44.44%
The proposed fees are too low	0	0.00%
Unsure	2	22.22%

7 respondents provided additional comments on this question.

6.20.3. What respondents said

No respondent selected that all three fees were proportionate. Four selected too high, three selected that some were proportionate and two were unsure.

Comments sought evidence of admission costs, officer time, the tier spread, demand and potential clients' willingness to pay. Feedback questioned the role of commercial value within a cost recovery rationale and suggested that automated or standardised applications could justify lower fees.

Alternatives included lower launch tariffs, staged payment, a flat structure or a wider or bespoke complexity range. One view found the overall range broadly proportionate but questioned its shape and derivation.

Department response

The Department welcomes the feedback on registration fee levels and the evidence respondents consider necessary to assess proportionality.

The Department is considering the concerns about affordability, the cost of entry and the basis for the proposed charges. Feedback on cost derivation, client demand, differences between tiers and alternative charging approaches is being considered alongside the updated cost model.

The aim is to balance affordability and participation with sustainable cost recovery. No final decision has been taken on registration fees, which remain subject to the required approvals.

6.21. Question 26: Annual Register Fee

6.21.1. What we asked

Is the proposed Annual Register Fee of £15,000 per registered asset proportionate?

6.21.2. Response summary

Response option	Count	Percentage
Yes, it is proportionate	1	11.11%
No, it is too high	7	77.78%
No, it is too low	0	0.00%
Unsure	1	11.11%

7 respondents provided additional comments on this question.

6.21.3. What respondents said

Seven respondents considered the £15,000 annual fee too high, one selected proportionate and one was unsure. The respondent selecting proportionate qualified this as appropriate for the first asset, with a lower charge for subsequent assets.

Comments raised portfolio costs alongside administration, assurance and other expenses, and questioned whether demand, willingness to pay and international benchmarks support

the amount. Respondents also linked pricing to the maturity and practical value of the services available at launch.

Concerns included reduced participation, a narrow user base and incentives to consolidate assets, with consequences for financing and later boundary corrections. Suggestions included lower introductory rates, stepped additional asset charges and annual caps.

Department response

The Department welcomes the clear feedback on the Annual Register Fee and notes the concerns about its level, particularly for multiple asset registration.

The concerns about affordability, the overall cost of participation and the cumulative charges for Foundations with several assets are being considered alongside the updated cost model. This feedback will inform consideration of the annual fee and charging approach.

The Department will seek to balance participation and market development with sustainable cost recovery. No final decision has been taken on the annual fee, which remains subject to the required approvals.

6.22. Question 27: Supporting early adoption

6.22.1. What we asked

Would you support the introduction of temporary measures to encourage early adoption, such as a reduced annual fee during the launch period, transitional pricing, or stepped charges for foundations registering multiple assets, where any resulting shortfall would be met from public funds?

6.22.2. Response summary

Response option	Count	Percentage
Yes, I would support this	8	88.89%
I would mostly support this	1	11.11%
No, I would not support this	0	0.00%
Unsure	0	0.00%

6 respondents provided additional comments on this question.

6.22.3. What respondents said

All respondents supported or mostly supported temporary measures where a resulting shortfall would be met from public funds.

Comments favoured reduced introductory fees, transitional or stepped pricing and a defined market development period. Respondents linked this to recognising early participants' risk and contribution, developing professional expertise and demonstrating commercial use cases.

An alternative preference was to reduce the overall fee level and review it, rather than rely only on temporary measures.

Department response

The Department welcomes the strong support for measures to encourage early adoption and the reasons provided for that support.

The consultation deliberately sought views on reduced launch fees, transitional pricing and stepped charges, including the potential for public funding of a resulting shortfall. This reflects the importance of early participation in establishing the Register.

The comments on the type and duration of support, the contribution of early participants and the alternative of lower overall fees will be carefully considered. The Department will assess the funding implications and long term sustainability before determining what should or can be incorporated.

6.23. Question 28: Optional services

6.23.1. What we asked

Do you agree that optional services should be priced separately from registration and the Annual Register Fee?

6.23.2. Response summary

Response option	Count	Percentage
Yes, I agree with separate pricing	8	88.89%
No, I do not agree with separate pricing	0	0.00%
Unsure	1	11.11%

5 respondents provided additional comments on this question.

6.23.3. What respondents said

Eight respondents supported separate pricing and one was unsure.

Comments described this as a transparent and fair approach under which those choosing additional services meet their cost, rather than spreading the charges across all registrants.

Feedback also emphasised reasonable charges that remain proportionate and do not obstruct practical use of the Register.

> Department response
>
> The Department welcomes the strong support for separate pricing of optional services.
>
> The proposed approach is to charge individually for services such as Passports, certified extracts and searches so that those who do not use them do not pay for them. Ordinary public inspection at the applicable access level is proposed to remain free.
>
> The feedback supports this proposed principle and will be carefully considered with the comments on proportionality and practical use as the final schedule and review arrangements are developed.

6.24. Question 29: Optional services

6.24.1. What we asked

Are the proposed optional service fees proportionate?

6.24.2. Response summary

Response option	Count	Percentage
Yes, all of the proposed fees are proportionate	3	33.33%
Some of the proposed fees are proportionate	4	44.44%
The proposed fees are too high	0	0.00%
The proposed fees are too low	0	0.00%
Unsure	2	22.22%

5 respondents provided additional comments on this question.

6.24.3. What respondents said

Three respondents considered all optional fees proportionate, four considered some proportionate and two were unsure. None selected too high or too low.

Comments were generally more comfortable with these charges than with the core annual fee, while asking for cost evidence, comparison with precedents and review against actual delivery experience.

A specific concern was that a full registration charge for each asset resulting from division or reorganisation could discourage improved boundaries. A lower administrative charge was suggested where work or underlying material had already been considered.

Department response

The Department welcomes the feedback on optional service fees, including the qualifications to the generally supportive selections.

The consulted schedule sets out separate charges for specific services and events. It proposes registration fees for each new record resulting from a structural event, while terminal events attract no fee. The wider fee proposals remain subject to consultation and greater certainty over the cost base.

The comments on calculation of charges, relevant precedents, actual delivery costs and reduced charges for structural changes will be carefully considered. The Department will decide what should or can be incorporated before the final service fee schedule is confirmed.

6.25. Question 30: Payment and non payment

6.25.1. What we asked

Do you agree with the approach to non-payment set out in section 5, in particular that non-payment should not affect the registered right itself?

6.25.2. Response summary

Response option	Count	Percentage
Yes, I agree	5	55.56%
I mostly agree	1	11.11%
No, I disagree	1	11.11%
Unsure	1	11.11%
Not Answered	1	11.11%

6 respondents provided additional comments on this question.

6.25.3. What respondents said

Five respondents selected agreement and one mostly agreed. One disagreed, one was unsure and one did not select an option but provided a supportive comment. Selected answers and narrative comments are reported separately.

Supportive comments favoured debt recovery and proportionate service consequences while preserving title. Respondents sought continued visibility of status, notice to interested parties and an opportunity for them to pay, a defined notice period, immediate restoration and a recorded suspension history. A lapsed status with consequences for transfers or marketplace notifications was also suggested.

An alternative view favoured removal, particularly where a foundation ceases to exist. Feedback also raised insolvency, loss of supporting services and wider enforcement issues.

Department response

The Department welcomes the support for preserving the registered right and the feedback on payment safeguards and wider legal circumstances.

Under the proposed approach, non-payment would not of itself affect the registration, accreditation or the personal property right. The draft Regulations provide for recovery of unpaid fees as a civil debt and, in the case of an unpaid annual maintenance fee, for formal notice and an opportunity to pay or identify an error. Non-payment may also be recorded on the Register and certain new applications may be deferred while the fee remains outstanding.

The comments on preserving visibility and commercial use, notification and payment by interested parties, notice periods, restoration and recorded status will be carefully considered when developing the detailed provisions. The Department will also consider the wider issues of enforcement, insolvency and a foundation ceasing to exist before determining what should or can be incorporated into the relevant arrangements.

6.26. Question 31: Further comments

6.26.1. What we asked

Do you have any further comments on the proposed fee framework?

6.26.2. Response summary

6 respondents provided comments.

6.26.3. What respondents said

Further comments returned to the balance between market creation and recovery, the opening fee levels and the flat per asset model. Respondents sought evidence of demand, pricing sensitivity, international competitiveness and benefits, and proposed time or volume limited launch support.

Feedback also raised financing, security interests and priority, enforcement and insolvency, notifications, asset boundary guidance and open development of standards. Comments sought durable safeguards for funding, reserve and development decisions, reporting and review triggers.

Responses included support for the regime and offers of further input. Concerns were also raised about whether fees remained genuinely open to change. Respondents asked that feedback and potential client views be carefully considered before the framework is finalised.

Department response

The Department welcomes the additional comments, the support for the regime's objectives and the offers to contribute to its development.

No final decision has been taken on the proposed fees. The figures in the consultation were provisional. The feedback received and updated cost information will inform the final approach, including changes where appropriate.

The Department will carefully consider the points on demand, competitiveness, launch support, charging design, practical and legal use, guidance and durable funding safeguards. Related points have been addressed under the relevant questions in this document. The Department will determine what should or can appropriately be incorporated before the final fee Regulations are progressed.

7. Cross cutting themes

7.1. Market development and early adoption

Feedback linked the fee framework to participation and market formation as well as recovery. Respondents suggested lower launch fees, transitional arrangements, stepped portfolio charges and time or volume limited support. Comments also raised fairness to early participants and the wider economic return to the Isle of Man.

7.2. Charging basis and fee levels

The proposed annual amount and the flat per asset structure generated concern. Comments linked them to portfolio costs, entry barriers, the number and diversity of assets, and incentives to consolidate or repurpose assets. Respondents sought evidence of demand, cost derivation and competitiveness before finalisation.

7.3. Transparency and review

Respondents sought visibility of income, operating and development costs, reserves, shared cost allocations and recovery balances. Suggestions included accounts, statutory or accounting protection of income, defined development and reserve targets, and reviews tied to registrations as well as recovery. Other comments sought proportionate reporting and consideration of commercial sensitivity.

7.4. Commercial and technical development

Feedback identified security interests and priority, enforcement and insolvency, notifications, interoperability, identifiers and records of the Register at a past date. Comments also sought clear asset boundaries, service standards, registration times, education, practical examples and international recognition. Wider suggestions require consideration in the development of the regime and are not agreed additions to the fee framework.

The Department welcomes these connected themes. It will carefully consider them alongside the original funding rationale, procurement and updated costs, and determine what should or can appropriately be incorporated into the fees, supporting arrangements or future development programme.

8. Next steps

The Department thanks everyone who took the time to contribute to the consultation.

The feedback received will inform the final fee approach and the drafting of the relevant fee regulations, alongside updated information on the costs of establishing and operating the Register.

Final fee levels and charging arrangements remain subject to the required approvals. The confirmed arrangements will be communicated before the fees take effect.

The Department will also consider what supporting guidance and information will be needed to explain the charges, payment requirements and review arrangements before the Register becomes operational.

DEPARTMENT FOR ENTERPRISE

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