

greater depth about the obligations of buyers and sellers in sales transactions. Finally, the third part covers contracts of carriage and related issues in greater detail.

While the explanatory parts of the book are excellent, the annexes may be even more useful for practitioners and students alike. On more than 300 pages, Ramberg has compiled a wealth of documents, beginning with the CISG, the UNIDROIT Principles and the Principles of European Contract Law, but extending much further into material that is otherwise not easily available. Particularly noteworthy are a series of model contracts and specimens for bills of lading, various waybills and so on.

The only critical remark that can be made with respect to this book might be construed as more of a suggestion: It is almost certain that every practitioner who deals with international commercial transactions, even occasionally, will find the book a most valuable addition to his or her private library – and probably a volume that will never be far from the workplace. However, a paperback edition for students is necessary so that this book may be used in the classroom because at a more competitive price (instead of the EUR 125 for the hardbound copy), this book has great potential for providing a remedy for the problem identified by Münster University and referred to in the previous review, namely the fact that the vast majority of practising attorneys does not feel comfortable with and tries to avoid international law when drafting contracts and planning commercial strategies. Other than that, there are only compliments to Jan Ramberg and the ICC on this excellent publication.

Frank Emmert

Paul J. Omar (ed.), *Procedures to Enforce Foreign Judgments*, Aldershot: Dartmouth Publishing Co./Ashgate Publishing Ltd. (2002), pp. i–xiv and 1–118

‘Judgments of foreign courts are official acts of the state in which the court is located, that is the state of the forum, and are effective only within the territory of that state. This international law principle of territoriality, or territorial sovereignty, is the reason that prompts the need for an official act by the recognising state allowing the foreign act of state, or foreign judgment, to have effect in the recognising state.’ This introductory passage in the chapter by Jürgen Böhmer on Germany outlines the background of the present volume.

It is the result of a project implemented by the Association of European Lawyers and brings together short country reports on the applicable rules and procedures for the recognition and enforcement of foreign judgments. Countries covered include Austria (Friedrich Schwank), Belgium (Nicole Van Crombrughe), England and Wales (Lisa Barstow and Julia Staines), Estonia (Risto Vahimets and Ilona Nurmela), Germany (Jürgen Böhmer), Guernsey (Tow Crawford), Isle of Man

(Jason Stanley), Spain (Jesus Muñoz-Delgado), Sweden (Annika Freij), and Switzerland (Phillip Känzig and Dorothea Meyer Schmidiger). With the exception of the German contributor, who is an academic, all authors are practising attorneys.

The idea of the book is to be complimented. To bring together all essential information on how to obtain recognition and enforcement of a foreign judgment for all major (European) jurisdictions in one slim volume in English certainly meets a growing need among legal practitioners and comparative lawyers in general. The implementation is not without weaknesses, however. While the editor claims that 'there has been an attempt to structure the information so that direct comparisons can be made between jurisdictions', this structure has largely escaped the attention of the present reader. Hence, the individual country reports or chapters are of very different length and detail and do not follow a consistent outline. This may be a disadvantage more for the comparative lawyer than for the practitioner because the latter is unlikely to want to read the book from cover to cover but rather look up country-specific information. However, this information is not consistent and complete in each case either. Some chapters provide information on court fees, others do not. Some chapters provide a concordance table for the Brussels/Lugano Conventions and national law provisions, others do not. Some chapters provide a fair number of references to further reading, others do not.

At some point the reader begins to wonder what the instructions to the authors could have looked like and what the 'project' of the Association of European Lawyers consisted of. Unfortunately, however, there is no general or introductory chapter which could explain these questions and put the different reports in context. All that is given is a few sentences about the aspirations of the book in the editor's preface and then a series of ten country reports. This makes it appear a little as though the editor simply asked corresponding law firms within the association to provide a couple of pages on the recognition and enforcement of foreign judgments in their jurisdiction and then for some reason did not have the time to write a general part before the deadline for the review exercise.

The selection of jurisdictions is another source of amazement. Granted, Guernsey and the Isle of Man may have their importance for practitioners in the UK. However, how can it be explained that Scotland is missing? And Ireland? Where are the Netherlands, France, or Italy? Why was Estonia included but not a single one of the other Central and Eastern European Countries (CEECs)? Particularly, since only Poland so far has been invited to join the Lugano Convention and certainly Poland, Hungary and the Czech Republic are much more important from the point of view of transnational legal practice. Again, the reader cannot help but get the impression that the selection was not based on conscious decisions but on chance – where do we know somebody? Or who submitted their reports in time?

Generally, the book is an example of a good idea lost in poor implementation. At GBP 40 it is a bad deal. Properly done, it would be a bargain even at GBP 100.

Frank Emmert