

John Honnold

Documentary History of the Uniform Law for International Sales

The studies, deliberations
and decisions that led to
the 1980
United Nations Convention
with introductions and
explanations

Kluwer

Documentary History of the Uniform Law for International Sales

The studies, deliberations and decisions
that led to the 1980 United Nations Convention
with introductions and explanations

by

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KLUWER LAW AND TAXATION PUBLISHERS
Deventer/Netherlands

Distribution in the USA and Canada
Kluwer Law and Taxation Publishers
101 Philip Drive
Norwell, MA 02061

Library of Congress Cataloging-in-Publication Data

Documentary history of the uniform law for international sales: the studies, deliberations, and decisions that led to the 1980 United Nations Convention with introductions and explanations/
by John O. Honnold

p. cm.

Includes index.

ISBN 9065443738

1. United Nations Convention on Contracts for the International Sale of Goods (1980)

2. Export sales contracts. I. Title.

K1028.3198.H658 1989

88-31237

341.7'54--dc19

CIP

Acknowledgments: To John Berger who with resourcefulness and good cheer turned a complex manuscript into a book; to the staff of the Biddle Law Library and especially Marta Tarnawsky, Foreign and International Law Librarian, for unfailing response to unreasonable requests; to Lorraine Vance and Pamela Jenkins for sustained and effective secretarial help: To these and others who helped, my deep gratitude.

ISBN 90 6544 3738

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*To My Colleagues
of the
United Nations Commission on International Trade Law
The Vienna Diplomatic Conference
and the
United Nations International Trade Law Branch*

PREFACE

This book grew out of difficulties I encountered in examining the legislative history of provisions of the 1980 Sales Convention, even though the material was at my elbow in the nine volumes of the UNCITRAL Yearbooks and the Official Records of the 1980 Vienna Conference. The problem was like looking for a needle in a haystack: The material I needed was hidden among the 3000 pages of these ten volumes.

So I found myself cutting the relevant documents from these valuable books and indexing them in terms of issues posed by the provisions of the Convention. Then came this thought: If one who had been involved in the development of the Convention finds it difficult to work with the legislative materials, many would find these problems insuperable; I should put the results of my work at their disposal.

Legislative history is especially important for international legislation like the 1980 Convention that is designed to establish uniform law for international trade. A “plain meaning” theory that rejects legislative history (whatever its justification when judges and parliamentary drafters share the same legal and linguistic conventions) becomes absurd in handling legislation prepared by an international multi-cultural body and finalized in six authentic languages. Without help from legislative history, domestic tribunals are likely to see the international text as an attempt to state the domestic rules which to them are familiar and natural—an approach that would erode the work of half a century to provide uniform law.

In the interest of uniformity and fairness the legislative materials underlying the 1980 Convention should be generally accessible—not merely to those with resources to find and purchase the volumes that contain the necessary documents and then conduct the research that is required to locate the relevant material.

These, in brief, are the purposes that inspired this work.

JOHN O. HONNOLD

Philadelphia, 1988

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I. GENERAL INTRODUCTION

A. THE UNIFORM LAW: ORIGINS

Uniform international sales law of world-wide significance went into effect on January 1, 1988. In 1980 a Diplomatic Conference of sixty-two States gave unanimous approval to the United Nations Convention on Contracts for the International Sale of Goods. For an initial group of eleven Contracting States, the international rules went into effect on January 1, 1988. By August 1, 1988, 6 additional States had deposited instruments of adoption and other States in various regions of the world were completing procedures to become Contracting States.¹

The current uniform rules are rooted in two earlier Conventions sponsored by the International Institute for the Unification of Private Law (UNIDROIT). These Conventions—one dealing with formation of contracts for international sale (ULF), the other with obligations of parties to such contracts (ULIS)—were developed over the course of three decades by leading commercial law experts of Western Europe and were finalized in 1964 by a diplomatic conference at the Hague. The 1964 Hague Conventions entered into force among nine States but, in spite of their fundamental importance, failed to receive substantial acceptance outside Western Europe.

The 1980 Convention resulted from work instituted in 1968 by the United Nations Commission on International Trade Law (UNCITRAL). Ten years of work in UNCITRAL produced the 1978 UNCITRAL Draft Convention. This draft was laid before the 1980 Conference which, after five weeks of intensive work, unanimously approved the current uniform rules. (See pp. 3–4, *infra*.)

The above development is described and the uniform law is analyzed in the author's Commentary on the Convention, cited as *Commentary*.² The Commentary and this Documentary History are companion volumes playing supporting roles.

B. TOOLS FOR UNIFORMITY IN APPLICATION

The half century of work that culminated in the 1980 Convention was sustained by the need to free international commerce from a Babel of diverse domestic legal systems. This book is designed to contribute to the Convention's ultimate goal—uniform *application* of the uniform rules.

1. The “homeward trend”. The Convention, *faute de mieux*, will often be applied by tribunals (judges or arbitrators) who will be intimately familiar only with their own domestic law. These tribunals, regardless of their merit, will be subject to a natural tendency to read the international rules in light of the legal ideas that have been imbedded at the core of their intellectual formation. The mind sees what the mind has means of seeing.

1. The eleven initial Contracting States were Argentina, China, Egypt, France, Hungary, Italy, Lesotho, Syria, United States of America, Yugoslavia and Zambia. The ninth, tenth, and eleventh instruments of adoption were deposited simultaneously on December 11, 1986. Entry into force on January 1, 1988 for these eleven States resulted from the waiting period specified in Article 99(1); a similar period for subsequent adoptions is specified in Article 99(2). Additional adoptions (with date of deposit of instrument) include: Finland (Dec. 15, 1987), Sweden (same), Austria (Dec. 29, 1987), Mexico (same), Australia (Mar. 17, 1988), Norway (Aug. 1, 1988).

2. J. Honnold, Uniform Law for International Sales under the 1980 U.N. Convention, §92 (Kluwer, 1982), cited as “*Commentary*”. A Spanish language version of the Commentary: J. Honnold, *Derecho Uniforme Sobre Compraventas Internacionales*, Madrid & Caracas: Edersa, 1987).

2. Long-range correctives. One may hope that, in time, comparative law study will include the legal culture of international unification. And there are measures for damage control through international critique of questionable interpretations; to this end plans are under way for the collection and dissemination of the case-law (*jurisprudence*) produced under the Convention.³

3. The role of legislative history. The above measures take time. Fortunately, there need be no delay in using legislative history to counteract the tendency to view the Convention through the lenses of domestic law. One who examines the evolution of the uniform law will be disabused of the view that the statutory language is simply an awkward attempt to state one's familiar domestic law. In addition, the legislative record can clarify the purpose and intent of the Convention's words.

In short, the Convention's legislative history now provides the one uniform international reference-point for applying the uniform international law.

4. Improving processes for international law-making. Work to develop uniform international rules is proceeding in other important fields. This work presents special and difficult problems that call for distinctive procedures and methods; successful techniques in developing the 1980 Convention should be noted for future use and false starts should be marked for discard.⁴ The records of the 1980 Convention can contribute to the development of the science of international legislation.

C. NEED FOR A COMPILATION

The materials in this Documentary History were compiled from documents scattered through nine volumes of the UNCITRAL *Yearbook* (2500 pages) and the *Official Records* of the 1980 Conference (519 pages). Few libraries have all of these volumes. Purchasing ten volumes (some of which may be out of print) to examine a point of legislative history that is recorded in two or three documents would be wasteful; for many the cost would be prohibitive. Indeed, in legal practice time may run out before the necessary volumes can be assembled.

With the necessary volumes at hand one still faces serious barriers—the difficulty of finding the relevant documents and of relating these documents to each other and to specific issues raised by the Uniform Law. As was mentioned in the Preface, this Documentary History grew out of work that this writer found necessary in interpreting the Convention. In this volume, introductions to the documents explain their relationship to each other and to the legislative process. In addition, references in the margins of the documents to the articles of the Convention make it possible to trace the decisions and deliberations that led to the final provisions of the uniform law. (These reference systems are described more fully at p. 4, *infra*.)

D. MAKING OF THE CONVENTION; THE RECORDS

The Convention was made in three stages: (1) The UNCITRAL Working Group (1970-1977); (2) Review by the full Commission (1977-1978); (3) The Diplomatic Conference (1980). In this volume the documents from these phases are reproduced in (1) Part III A (the Working Group), (2) Part III B (the Commission) and (3) Part III C (the

3. Ways to maximize uniformity in interpreting the Sales Convention were studied at the Twelfth International Congress of Comparative Law (Sydney & Melbourne, 1986). The general report by the present writer drew on sixteen national reports describing legislative and judicial practices relevant to construing an international statute. The general report will be published under the auspices of the Congress. See also *Commentary* §§ 85-93.

4. For discussion of techniques for international law-making see *Commentary* §§ 71-73, 232-236 (relationship to domestic law).

Diplomatic Conference).

(1) The UNCITRAL Working Group (1970-1977)

Membership in the full Commission (UNCITRAL) is limited to 36 States under the following regional allocation: Africa, 9; Asia, 7; Eastern Europe, 5; Latin America, 6; Western Europe and Others, 9. (“Western Europe and Others” includes Australia, Canada, the United States and New Zealand.)

The membership of 36, although dramatically smaller than the General Assembly, is still too large for drafting technical legal documents. In addition, progress can be expedited by concurrent work on separate projects—e.g., international sales, arbitration, negotiable instruments, shipping. Consequently, the Commission delegates the necessary preparatory work to specialized working groups—cross-sections of the Commission’s world-wide membership.

In 1969 UNCITRAL established a 14-State Working Group on the International Sale of Goods with the mandate to prepare draft legislation that would facilitate acceptance of the uniform rules “by countries of different legal, social, and economic systems”⁵. This Working Group, under the effective chairmanship of Professor Jorge Barrera Graf of Mexico, completed this task in nine sessions (1970-1977). The deliberations of the Working Group and studies of the Secretary-General used as bases for this work appear in this volume as Documents A(1) to A(14). These documents are listed and identified in the Table of Contents, page xi, *supra*; highlights of the Working Group proceedings are described in the Introduction to Part III A, *infra*, at p. 13.

The Working Group produced two draft Conventions. The first was the 1976 Draft Convention on Sales, setting forth the rights and obligations of the seller and buyer under the sales contract (Docs. A(1)-A(11)). This draft is frequently referred to as the “Sales” draft to distinguish it from the draft on “Formation” of the Sales contract which the Working Group completed in September 1977. (Docs. A(13) and A(14).)

(2) Review by the full Commission (1977-1978)

In the second stage, the full Commission reviewed the Working Group’s “Sales” and “Formation” drafts, and combined them into one document—the 1978 Draft Convention on Contracts for International Sale of Goods. The Commission gave this draft Convention its unanimous approval and recommended that the U.N. General Assembly convene a diplomatic conference to review the draft and finalize a Convention. Highlights of the Commission’s work are described in the Introduction to Part III B, p. 317, *infra*. Reports of the Commission’s deliberations and action are reproduced as Documents B(1), B(2) and B(3).

(3) The Diplomatic Conference (1980)

The U.N. General Assembly promptly authorized the convening of a Diplomatic Conference to act on the UNCITRAL draft. The Conference, attended by 62 States, met in Vienna from 10 March to 11 April 1980 and, after five weeks of intensive work, gave unanimous approval to the Convention. This final stage appears in Part III C as Documents C(1)-C(9).

Most of the work was done in two great “Committees” each of which included all States that attended the Conference. The larger task was assigned to the First Committee, which prepared Parts I-III (Articles 1-88) of the Convention—the uniform law for international sales. The Second Committee prepared Part IV, Final Provisions (Articles

5. The Commission’s working methods in preparing the draft Convention are described more fully in the *Commentary* at §§ 5-9, pp. 49-54.

89–101) governing the Convention's entry into force and related matters.⁶ See F(3), p. 5, *infra*.

This division of responsibility permitted simultaneous work on different parts of the Convention. In addition, "Committees" could take action by majority vote whereas significant action by the Conference Plenary required approval by a two-thirds majority. In voting on the 88 articles of the uniform law (Parts I–III), 74 were approved unanimously and 8 received no more than two negative votes. However, for two articles the majority fell short of two-thirds; *ad hoc* working groups then brought in compromise versions that were approved without dissent.⁷ (See also the Introduction to Part III C, p. 381, *infra*, and the notes that introduce each document.)

E. HOW TO FIND THE RELEVANT LEGISLATIVE HISTORY

In tracing the development of a provision of the 1980 Convention we must cope with this problem: As the drafts moved through the legislative process their article-numbers kept changing. Thus, the Commission's initial work was addressed to the articles (and article-numbers) of the 1964 Hague Sales Conventions. As articles were added, deleted, and reorganized, renumbering became necessary. At each legislative session action necessarily was based on the article and *article-numbering* of the draft *brought to the session*. For example, the discussion and actions at the 1980 Vienna Conference were made in terms of article-numbers of the 1978 UNCITRAL Draft Convention; the final article numbers emerged only at the very end of the Conference.

In practice, problems of interpretation emerge from the final articles of the Convention. How can one trace the development that led to the final text?

(1) The way through the maze.

(a) **The Concordance.** A bird's eye view of the evolution of the drafts is provided by a Concordance (Part II, p. 9, *infra*)—a table that relates the article-numbers of the 1980 Convention to the article-numbers of the various drafts.

(b) **The Table of references related to Articles of the Convention.** More significantly, references to the final articles of the Convention (C.1, C.2, etc.) are inserted in the margins of documents where there is discussion of draft provisions (or issues) that evolved into (or shed light on) the designated article of the Convention. The references for each article are collected in the Table that appears at p. 869 *infra*. In short, the Table blazes a trail through twenty-six documents showing the development of each provision in the uniform law.

(c) **The Index.** Some problems are not confined to single articles. References to the legislative history of significant general issues and specially important questions appear in the Index at the end of the book at p. 875. The Table and the Index supplement each other; both should be used for a thorough search.

F. CHOICES OF ORGANIZATION AND COVERAGE

Some of the choices that had to be made in organizing these materials call for explanation.

(1) Dissection v. Complete Documents

For several years this writer, in handling litigation under a statute where legislative history was important, used a compilation in which the legislative documents were cut into pieces and reassembled under the applicable statutory provision. The documents that embody

6. See also *Commentary* § 10.

7. For a more detailed account see *Commentary* § 10, note 14.

the legislative history of the Sales Convention are so complex and cover such a time-span that dissecting them would lead to serious confusion. Instead, the documents are presented in their entirety; one may find the material that is relevant to each article of the Convention by the Table and Index described at (E)(1), *supra*.

Slicing the documents into pieces is also barred by the costs of printing. It is now evident that the 1980 Uniform Law will be applied in many areas where high costs for needed legislative history would limit access to this material and thereby compromise the fair and uniform application of the Convention. Cutting the materials apart would require setting type for over seven hundred closely-printed pages; preserving the full document permits photographic reproduction and also provides authentic citations to the official legislative documents.

(2) Archeology v. Chronology

One might be tempted to present the legislative materials in the order in which shards are uncovered in an archeological “dig” which first uncovers the most recent material and then digs down to earlier times. This approach to the 1980 Convention would place up front the deliberations and decisions at the 1980 Conference. However, unlike archeologists, we can start at the beginning. In the interest of clarity, these materials are presented in historical sequence.

One who wishes quickly to see whether an issue was solved decisively at the Diplomatic Conference can turn first to the material on the 1980 Conference in Part III (C), *infra*. This is probably where one would be tempted to start in dealing with current problems in law practice—as contrasted with a scholarly investigation of the legislative process. However, decisions at the Diplomatic Conference that reversed policies developed in UNCITRAL were few, perhaps not more than five.⁸ In most cases the policies that prevailed were developed in the basic studies and deliberations of the Working Group and in the review by UNCITRAL. Provisions embodying these policies were often approved without discussion at the 1980 Conference: the legislative history of a provision calls for an examination of all three stages (III A, III B, III C, *infra*) of the law-making process.

(3) The “Final Provisions”

This Documentary History is primarily concerned with the legislative history of the uniform rules for the international sale of goods: CISG Parts I–III (Articles 1–88) and, in addition, includes relevant aspects of Part IV (Articles 89–101)—the “Final Provisions” that govern the Convention’s entry into force, reservations by Contracting States and similar questions.

Two of the Final Provisions permit declarations (reservations) that affect the uniform sales law in Parts I–III. Article 95 permits a Contracting State to modify the scope of the Convention by excluding Article 1(1)(b); Article 96 permits a State to reject Article 11 which overrides formal requirements for making sales contracts. These provisions grew out of discussions in UNCITRAL and were reviewed by the First Committee of the Diplomatic Conference; their legislative history is covered in this volume. Other Final Provisions were not sufficiently relevant to the uniform sales law to justify including the proceedings of the Conference’s Second Committee where these Final Provisions were formulated. Those who wish to explore the background of these provisions may wish to consult the Official Records of the 1980 Conference at pp. 141–154, 229–230 and 434–480.

(4) The 1964 Hague Sales Convention

As was mentioned at p. 1, *supra*, the 1980 Convention is rooted in two conventions

8. Reversals of UNCITRAL action at the Diplomatic Conference are discussed in *Commentary* § 10, p. 54 (note 11).

finalized at the Hague in 1964—one on formation of the contract (ULF) and one on obligations under the contract (ULIS). Some provisions of the 1980 Convention are substantially the same as provisions of one of the 1964 Conventions; in some situations it may be useful to examine the legislative history leading to the 1964 Conventions.

The linkage between the 1980 and 1964 Conventions is disclosed in many of the documents reproduced in this work. As was mentioned at p. 4, *supra*, the UNCITRAL Working Group in formulating the “Sales” and “Formulation” drafts based its deliberations on the 1964 Sales (ULIS) and “Formation” (ULF) Conventions; examination of each issue would commence with the quotation of the applicable provision in the 1964 Convention (ULIS or ULF) and a discussion of whether the 1964 provision should be retained or modified. In the 1977 and 1978 UNCITRAL review and revision of the Working Group drafts (Part III B, *infra*) and at the 1980 Diplomatic Conference (Part III C, *infra*) delegates from States where the 1964 Hague Conventions were in force would often propose the return to the 1964 provisions.

The linkages between the 1980 and 1964 Conventions that appear in this Documentary History are not the equivalent of the full presentation of the background of the 1964 Conventions. However, one who digs into legislative history probably has at hand a commentary on the 1980 Convention that will include the text of the 1964 Conventions and discuss the relationship between the 1964 and 1980 provisions.⁹ The scholar or lawyer who wishes to dig deeper may consult the two-volume records of the 1964 Conference¹⁰ and the Commentaries on the 1964 Conventions.¹¹

At this point, this Documentary History reaches the boundary limits described by Frederic Maitland: “Such is the unity of all history that any one who endeavors to tell a piece of it must feel that his first sentence tears a seamless web. . . . The web must be rent; but as we rend it, we may watch the whence and whither of a few of the severed and ravelling threads which have been making a pattern too large for any man’s eye.”

G. DOCUMENTS; ABBREVIATIONS

(1) Cross-Referencing within the Documentary History

To facilitate cross-referencing each document is given a reference-number that relates it to the listing of documents in Part III of the Table of Contents, *supra*. To illustrate: The document listed in Part III A(1) of the Table is called *Doc. A(1)*, and so on for the documents in Parts III B and III C. By this system each document can be found quickly by referring to the page-number opposite that document in the Table of Contents. (The complex U.N. document numbers, described below, could not be used for cross-referencing within this Documentary History.)

(2) The UNCITRAL Yearbooks

The only usable source for proceedings in UNCITRAL are the UNCITRAL Yearbooks.

9. *Commentary* pp. 531-538 (ULF), 539-567 (ULIS). In this commentary, in introducing each article of the 1980 Convention, reference is made to the relevant provision of the 1964 Convention.

10. Diplomatic Conference on the Unification of Law Governing the International Sale of Goods, The Hague, 2-25 April 1964, Records and Documents of the Conference (2 Vols.): The Hague: Ministry of Justice of the Netherlands, 1966. Of special value are the pre-Conference reports of the Special Commission, *id.*, Vol. II pp. 3-78 (“Sales” provisions) and 421-432 (“Formation” provisions). See also the Commentary by Professor André Tunc on the 1964 Conventions, *id.* Vol. I, pp. 357-391.

11. *In English*: Graveson, Cohn, Graveson, *The Uniform Laws on International Sales Act of 1967* (enactment for the U.K.) (1968); Honnold, ed., *Unification of the Law Governing International Sale of Goods* (Dalloz, Paris, 1965). *Id.*, *A Uniform Law for International Sales*, 107 U.Pa.L.Rev. 299 (1959); *Id.*, *The Hague Convention of 1964*, 30 Law & Contemp. Problems 326 (1965).

German: H. Dölle *et al.*, *Kommentar zum Einheitlichen Kaufrecht*, München: Beck, 1976 (840 closely-printed pages). *Spanish*: J. Barrera Graf, *La Reglamentación Uniforme de las Compraventas Internacionales de Mercaderías*. México: 1965.

I Yearbook 176 refers to page 176 of the book bearing the following title: UNITED NATIONS COMMISSION ON INTERNATIONAL TRADE LAW — YEARBOOK Volume I: 1968–70. The years following the volume number (here 1968–70) refer to the period of UNCITRAL activity reported therein.

The following table gives (1) the abbreviation for the volume, (2) the year or years covered, (3) the U.N. Document number, and (4) the publication number of the English version. (“E” stands for the English version; “F”, “R”, or “S” would refer to the French, Russian or Spanish version. The Yearbooks during this period were not produced in Arabic or Chinese.)

UNCITRAL YEARBOOKS

(1) Abbreviation	(2) Year	(3) U.N. Doc. No.	(4) Pub. No.
I Yearbook:	1968–70	A/CN.9/SER.A/1970	E.71.V.4
II Yearbook:	1971	A/CN.9/SER.A/1971	E.72.V.4
III Yearbook:	1972	A/CN.9/SER.A/1972	E.73.V.6
IV Yearbook:	1973	A/CN.9/SER.A/1973	E.74.V.3
V Yearbook:	1974	A/CN.9/SER.A/1974	E.75.V.2
VI Yearbook:	1975	A/CN.9/SER.A/1975	E.76.V.5
VII Yearbook:	1976	A/CN.9/SER.A/1976	E.77.V.1
VIII Yearbook:	1977	A/CN.9/SER.A/1977	E.78.V.7
IX Yearbook:	1978	A/CN.9/SER.A/1978	E.80.V.8
X Yearbook:	1979	A/CN.9/SER.A/1979	E.81.V.2

(3) The Working Group (1970–1977) and Other Reports to UNCITRAL

Reports by the UNCITRAL Working Group and other documents submitted to UNCITRAL have identifying numbers that start with “A/CN.9”. This system reflects the fact that UNCITRAL was the ninth commission (“CN.9”) created by the U.N. General Assembly (“A”); A/CN.9/35 means that this is the 35th document submitted to UNCITRAL (“A/CN.9”). These reports are not generally available, but appear in the UNCITRAL Yearbooks.

To illustrate: At the top of the introduction to the first document in Part I A, p. 14 *infra*, one will note three references: (1) *Doc. I(A)*—the document-number for the internal cross-references explained at part (1); (2) *I Yearbook 176–202*—the Yearbook reference explained above at part (2); and (3) *A/CN.9/35*—The U.N. document number for the Working Group report to UNCITRAL (“CN.9”), explained above at part (3).

(4) UNCITRAL Reports to the U.N. General Assembly

The records of UNCITRAL’s review and revision of the Working Group drafts (Part III B, *infra*) appear in UNCITRAL’s annual reports to the General Assembly. The U.N. document numbers for the UNCITRAL Annual Reports relevant to this work and references to the Yearbook where they are reproduced appear in the following table.

UNCITRAL'S ANNUAL REPORTS

Session	Document No.	Yearbook (Vol. & Page)
First (1968)	A/7216	I, 71
Second (1969)	A/7618	I, 94
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Seventh (1974)	A/9617	V, 13
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Ninth (1976)	A/31/17	VII, 9
Tenth (1977)	A/32/17	VIII, 11
Eleventh (1978)	A/33/17	IX, 11

(5) The 1980 Diplomatic Conference

Part III C is built, with explanatory and connecting material, from the relevant parts of the Official Records of the Conference. The full title: *United Nations Conference on Contracts for the International Sale of Goods, Vienna, 10 March–11 April 1980, Official Records*, U.N. Document No.: A/CONF.97/19; United Nations, Vienna, 1981; Sales No. E.81.IV.3. This document is cited as *Official Records* or *O.R.*, followed by the page-number.

The *Official Records* were compiled from separate documents produced for and by the Conference. These documents bear numbers that commence "A/CONF.97/". (This was the 97th conference called by the U.N. General Assembly.) Further information about these documents is given in the Introduction to Part III C, and in the introductory notes to documents C(1)–C(9).

II. CONCORDANCE: THE 1980 CONVENTION AND EARLIER VERSIONS

I 1980 Sales Convention	II 1978 Draft Convention	III UNCITRAL Sales Draft (1977)	IV W/G Sales Draft (1976)	V * ULIS (1964)	VI UNIDROIT Drafts on Sale (1956/1963) *
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(The topical headings, below, relate to the Parts and Chapters of the 1980 Convention.)					
<i>Part I. Ch. I: SPHERE OF APPLICATION</i>					
1	1	1	1,6 (c)	1,2, 7	5, 11
2	2	2	2	5	9
3	3	3	3	1(7),6	10
4	4	6	7(1)	8	12
5	--	--	--	--	--
6	5	4	5	3	6
 <i>Ch. II: GENERAL PROVISIONS</i>					
7	6	13	13	17	--
8	7	--	--	--	--
9	8	7	8	9	14
10	9	5	6	1(2)	2,4
11	10	11(1)	11	15	19
12	11	11(2)	--	--	--
13	--	--	--	--	--

			IV W/G Formation Draft (1977)	V * ULF (1964)	VI UNIDROIT Draft on Formation (1958) *
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<i>Part II: FORMATION</i>					
14	12	--	8	4	3
15	13	--	9	5	4
16	14	--	10	5	4
17	15	--	11	--	--
18	16	--	12	6,8	5,7
19	17	--	13	7	6
20	18	--	14	8(2)	--
21	19	--	15	9	8
22	20	--	16	10	9
23	21	--	17	--	--
24	22	--	7	12	10

* The UNIDROIT drafts and 1964 uniform laws (ULIS and ULF) were discussed in the General Introduction, pp. 1, 5-6. For further references see Honnold, Commentary (1982) Appendix B.