
GLOBAL SALES
AND
CONTRACT LAW

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PREFACE

Globalised trade necessitates globalised legal thinking. This is especially true in the field of contract law in general, and sales law in particular. It is an easy statement to make, but not quite so easy to implement. We believe a range of factors informs what actually amounts to globalised legal thinking and we hope these permeate throughout this book. We have been guided by our belief in the need to enhance respect for different legal thinking, and to improve access and understanding of these different approaches, and to further the dialogue and exchange of ideas that already exists.

We have sought to produce a practical endeavour – something that can actually be used in practice – in other words we did not set out to build theories but rather give answers to practical problems. In the process we have attempted to underscore the relevance of comparative legal studies and the functional comparative approach in particular. We hope that our work will be used by a large spectrum of those involved in contract and sales law—ranging from students and academic researchers, to legal practitioners, as well as law makers. With this in mind we have written the book so that it can be read and utilised in two ways. This is a book which can be read cover to cover. However it can also be used as a reference source for particular issues.

We are well aware that one can really only fully understand the operation of law in jurisdiction from the inside, and while we have all lived and worked in several jurisdictions, our personal experience does not extend to all the jurisdictions covered in this book. As such we have relied heavily on the advice of our core research team, our correspondents and existing academic texts. We have done our best to confirm the accuracy of the information we report. This has been particularly difficult at times, especially where legislation and commentary was only available in languages not spoken by any of our team. In a variety of instances we have had to work from unofficial translations – where our experience suggested these translations may not be entirely accurate we have endeavoured to express a qualified view.

This book is the result of a four year research project conducted at the University of Basel, Switzerland under the direction of Prof Dr Ingeborg Schwenzer LL.M., and the two senior researchers Dr Pascal Hachem and Dr Christopher Kee. Dr Kee's doctoral thesis on validity in sales law is published as Part IV of this work.

The work on this book has been a daunting but extremely rewarding challenge, and it would not have been possible without the support and assistance of many people. The core research team in Basel consisted of Dr Mohamed Hafez LL.M., Dr Jean Alain Penda Matipe LL.M., Dr Natia Lapiashvili LL.M., Dr Edgardo Munoz LL.M., and Dr Sophia Juan Yang LL.M. Additional specific research assistance was provided by Başak Başoğlu, LL.M., Claire Chabat, LL.B. MLaws, Yulia Douanova, Deepaloke Chatterjee, Dr Kevin Kee MEd, MEd (Admin), Candy Tang, Gabriela Vizcaino, Claudio Marti MLaw, Philippe Monnier MLaw, Sarbajeet Nag, Alissa Anita Palumbo JD, Ref. iur. David Tebel. Valuable assistance was also received from numerous student assistants—stud iur Christoph Burckhardt, Tomie Keller BLaw, stud iur Lukas Meyer, stud iur Christian Schlumpf, stud iur Nicole Schmidt. Last but not least we were supported by a worldwide network of correspondents. We are greatly indebted to all these people and sincere thank them for their contributions.

Our work would not have been possible without financial support from a number of organisations, in particular the Swiss National Science Foundation, the Freiwillige Akademische Gesellschaft, the Max Geldner-Stiftung, and the Stiftung zur Förderung der rechtlichen und

wirtschaftlichen Forschung an der Universität Basel. A resource contribution was also made by Mr Cristobal Reitze.

We also received statements of support from various international organisations for which we are very grateful. These organisations were in alphabetical order: Association Suisse de l'Arbitrage, Beijing Arbitration Commission, Chartered Institute of Arbitrators, CISG Advisory Council, Institute for International Commercial Law (Pace University), Institute for Private International Law in Africa (University of Johannesburg), Ohada, and the Singapore International Arbitration Centre.

A number of prominent and influential people in the fields of international commercial law and arbitration also lent us their considerable support. In particular we would like to acknowledge (in alphabetical order) Professor Michael Bridge, Professor J Martin Hunter, Dr Pierre Karrer, Colin Wall and Dr Markus Wirth. A special mention must be made of our dear friend the late Professor Albert Kritzer, who as ever was always full excitement and encouragement for our work.

Thanks go also to the University of Basel, and our colleagues, both at the Chair and the Faculty more broadly, who have assisted us with all matters of administration. Particular mention is made of Claudine Abt, Elke Müller, Jörg Fraunhofer, and Dr Ulrich Pfister.

We are also greatly indebted to the team at Oxford University Press, especially to Rachel Mullaly and Khanam Virjee, for their patience and the swift handling of the publication process.

The end product (with the exception of the index and tables) is our creation and the errors are ours. Local advice must always be sought about the particularities of any individual jurisdiction.

We hope that many people all over the world will find this book a helpful guide to comparative sales and contract law.

And it was fun and a cultural enrichment for all of us!

Ingeborg Schwenzer
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Basel, August 2011

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ABBREVIATIONS

A	Atlantic Reporter
A 2d	Atlantic Reporter, Second Series (USA)
A Pac L Rev	Asia Pacific Law Review (USA)
A y D	Actualidad y Derecho (Spain)
A-A Leg Cons Comm R	Asian-African Legal Consultative Committee Report
ABA	American Bar Association
ABAJ	American Bar Association Journal (USA)
ABGB	Allgemeines Bürgerliches Gesetzbuch of 1 June 1811 (Austria)
AbzG	Gesetz betreffend die Abzahlungsgeschäfte (Germany)
AC	Actualidad Civil
AC	Law Reports, Appeals Cases (Great Britain)
ACA	Arbitration and Conciliation Act
AcP	Archiv für die civilistische Praxis (Germany)
Act Jur Hung	Acta Juridica Academiae Scientiarum Hungaricae (Hungary)
Actes	Conférence diplomatique sur l'Unification du droit en matière de la vente internationale, Den Haag, 2–25 April 1964, Actes et Documents de la Conférence, Bd. I: Actes, Ministère de la Justice des Pays-Bas (ed), Den Haag: Imprimerie Nationale (1966)
ADB 1963	Allgemeine Deutsche Binnen-Transportversicherungs-Bedingungen of 1963 (Germany)
ADC	Anuario de Derecho Civil (Spain)
ADHGB	Allgemeines Deutsches Handelsgesetzbuch of 1861 (Germany)
ADR	Alternative Dispute Resolution
ADS Güterversicherung	Allgemeine Deutsche Seeversicherungsbedingungen of 1919 (version of 1984; Germany)
ADSp	Allgemeine Deutsche Spediteurbedingungen of 1 January 2003, released on < http://www.spediteure.de > (Germany)
Adv	The Advocate (Canada)
Advoc Q	The Advocates' Quarterly (Canada)
Afr J Int L	African Journal of International Law (Great Britain)
AG	Amtsgericht (German District Court)
AGBG	Gesetz zur Regelung des Rechts der Allgemeinen Geschäftsbedingungen of 9 December 1976 (Germany)
AGer	Amtsgericht (Swiss District Court)
AgRg	Agravo Regimental
AIPO	African Intellectual Property Organization
AJP	Aktuelle Juristische Praxis (Switzerland)
AL	Arbitration Law
Al Majalla	Al Majalla Al Ahkam Al Adliyah
ALB/RGW	Allgemeine Bedingungen für die Warenlieferungen zwischen den Organisationen der Mitgliedsländer des Rates für gegenseitige Wirtschaftshilfe of 1979 (GDR)
ALI	American Law Institute (USA)
ALI-ABA	American Law Institute-American Bar Association (USA)
All ER	All England Law Reports (Great Britain)
All NLR	All Nigerian Law Reports
ALR	American Law Reports
Am Bus LJ	American Business Law Journal (USA)

Am For L Assn Newsletter	American Foreign Law Association Newsletter (USA)
Am J Com(p) L	American Journal of Comparative Law (USA)
Am J Int L	American Journal of International Law (USA)
Am L & Econ Rev	American Law & Economics Review (USA)
An Jur	Anuario jurídico (Mexico)
Ann dr mar & aero-spat	Annuaire de droit maritime et aero-spatiale (France)
Ann Genova	Annuario Genova (Italy)
AnwBl	Anwaltsblatt (Germany)
App/CA	Court of Appeal(s)/Cour d'appel (French Court of Appeal)/Corte d'Appello (Italian Court of Appeal)
App Ct	Appellate Court
approx	approximately
Arb	Arbitration
Arb Int	Arbitration International (USA)
Arb J	Arbitration Journal (USA)
Arch iur Cracov	Archivum iuridicum Cracoviense (Poland)
Ariz J Int & Comp L	Arizona Journal of International and Comparative Law (USA)
Ariz J Int L	Arizona Journal of International Law (USA)
Ariz St LJ	Arizona State Law Journal
Ark L Rev	Arkansas Law Review
Art(s)	Article(s)
Art/Arts	Article/Articles
ASIL Proc	American Society of International Law Proceedings
Ass Plén	Cour de Cassation, Assemblée plénière (France)
Ass'n	Association
AT	<i>Audiencia Territorial</i>
Ateneo LJ	Ateneo Law Journal (Philippines)
AUDCG	Acte Uniforme relatif au droit commercial general of 17 April 1997 adopted by OHADA
Aus	Australia
Aust Bus L Rev	Australian Business Law Review
Aust LJ	The Australian Law Journal
AW	DDR-Außenwirtschaft. Information and documents, published by the Zentrum für Information & Dokumentation für Außenwirtschaft, Beilage (Supplement) 1: Recht im Außenhandel (GDR)
AWD	Außenwirtschaftsdienst of Der Betriebsberater, see RIW
AW-Prax	Außenwirtschaftliche Praxis, Zeitschrift für Außenwirtschaft in Recht und Praxis (Germany)
Az Sup Ct	Arizona Supreme Court
B2B	Business to Business
B2C	Business to Consumer
BAG	Bundesarbeitsgericht (Federal Supreme Labour Court Germany)
Bankr D Or	Bankruptcy District Court for the District of Oregon
Bankr M D Fla	Bankruptcy District Court for the Middle District of Florida (USA)
BAnz	Bundesanzeiger (Germany)
BB	Der Betriebsberater (Germany)
BBJ	Boston Bar Journal (USA)
BBJ	Bundesblatt (Switzerland)
BC Sup Ct	British Columbia Supreme Court
Bd(e)	Band/Bände (volume[s])
BeckRS	Beck Rechtsprechung

Beil	Beilage (Supplement)
BezGer	Bezirksgericht (Austrian/Swiss district court)
BGB	Bürgerliches Gesetzbuch (Civil Code Germany)
BGB-InfoV	Verordnung über Informations- und Nachweispflichten nach bürgerlichem Recht of 2 January 2002 (Germany)
BGBI	Bundesgesetzblatt (Germany)
BGE	Entscheidungen des Schweizerischen Bundesgerichts (Switzerland)
BGer	Bundesgericht (Federal Supreme Court Switzerland)
BGH	Bundesgerichtshof (Federal Supreme Court Germany)
BGHZ	Entscheidungen des Bundesgerichtshofes in Zivilsachen (Germany)
BIL	Bankruptcy and Insolvency Law
Bing	Bingham
BJM	Basler Juristische Mitteilungen (Switzerland)
BL	Bankruptcy Law
BlgNR	Beilagen zu den Stenographischen Protokollen des Nationalrats (Austria)
BLR	Building Law Reports
BMJ	Bundesministerium der Justiz (Germany)
Bol mex der comp	Boletín Méxicano de Derecho Comparado (Mexico)
Bos & P	Bosanquet & Puller's Common Pleas Reports
Boston B J	Boston Bar Journal
BR/DC	Baurecht/Droit de la construction; Mitteilungen zum privaten und öffentlichen Baurecht, Seminar für Schweizerisches Baurecht, Universität Freiburg (Switzerland)
BR-Drs	Bundesrats-Drucksache (Switzerland)
Brigham Young U L Rev	Brigham Young University Law Review (USA) (see also BYU LRev)
Brook J Int L	Brooklyn Journal of International Law (USA)
Brussels Convention	European Convention on Jurisdiction and the Enforcement of Judgments in Civil and Commercial Matters (see also EuGVÜ)
Brussels Regulation	Council Regulation (EC) no 44/2001 of 22 December 2000 on jurisdiction and the recognition and enforcement of judgments in civil and commercial matters; see also EuGVO
BT	Bundestag (Germany)
BT-Drs	Bundestags-Drucksache (Germany)
BT TA	Bulgarska turgosko-promishlena palata (Bulgarian chamber of commerce and industry)
Bull Civ	Bulletin des arrêts de la Cour de Cassation, Chambres civiles (France)
Bull Transp Int Ferrov	Bulletin des Transports Internationaux Ferroviaires (Switzerland)
Burr	Burrow
Bus Law	The Business Lawyer (USA)
BW	Burgerlijk Wetboek of 2 July 1986 (Netherlands)
BYU J Pub L	Brigham Young University Journal of Public Law (USA)
BYU L Rev	Brigham Young University Law Review (USA) (see also Brigham Young U L Rev)
C & P	Carrington & Payne's Nisi Prius Reports
C consom	Code de la consommation (France)
C D C	Cuadernos de Derecho y Comercio (Spain)
C&ComPL	Civil and Commercial Procedural Law
C&F /C y F/CFR	Cost and Freight
C2C	Consumer to Consumer
CABECA	Capacity Building for Electronic Communication in Africa

CAD	Canadian Dollar
CAEM	Conseil d'assistance économique mutuelle
Cah de Dr	Les Cahiers de Droit (Canada)
Cah jur fisc exp	Cahiers juridiques et fiscaux de l'exportation (France)
Cal L Rev	California Law Review
Cal Sup Ct	Supreme Court of California
Calif West Int LJ	California Western International Law Journal (USA)
Cambridge LJ	Cambridge Law Journal (Great Britain)
Cambridge Lect	The Cambridge Lectures (Canada)
Camp	Campbell's Nisi Prius Cases
Can Bus LJ	Canadian Business Law Journal
Can Counc Int L	Canadian Council on International Law
Can Int	Canadian International Lawyer (Canada)
Can Sup Ct	Supreme Court Canada
Can-US LJ	Canada-United States Law Journal
Cardozo J Int & Comp L	Cardozo Journal of International and Comparative Law (USA)
Cardozo L Rev	Cardozo Law Review
Cass	La Suprema Corte di Cassazione (Italian Court of Cassation)
cass	Cassation
Cass Civ	Civil Court of Cassation / Civil Cassation
Cass civ 1er	Cour de Cassation, Première Chambre civile (First Civil Chamber of the French Court of Cassation)
Cass civ 2e	Cour de Cassation, Seconde Chambre civile (Second Civil Chamber of the French Court of Cassation)
Cass civ 3e	Cour de Cassation, Troisième Chambre civile (Third Civil Chamber of the French Court of Cassation)
Cass com	Cour de Cassation, Chambre civile, Section Commerciale (Commercial Chamber of the French Court of Cassation)
Cass pen	Criminal Cassation
Cass req	Cour de cassation (chambre des requêtes)
Cass soc	Social Cassation
CC	Civil Code/Code civil (France)/Codice civile (Italy)/Código civil
CC Fasc	periodo cronologico delle carte contenute nel fascicolo (Italy)
CCA	Collection of Cassation Awards
CCC	Civil and Commercial Code
CCI	Chamber of Commerce and Industry / Chambre de Commerce Internationale Paris (see also ICC)
CCI Int Ct Arb	International Arbitration Court attached to the Chamber of Commerce and Industry
CCJA	Common Court of Justice and Arbitration
Ccom	Code de Commerce (France) / Código de Comercio (Spain)
CComP	Code of Commercial Procedure
CCP	Code of Civil Procedure (Canada)
CCRC	Court of Cassation Rulings Collection
CCTOC	Court of Cassation Technical Office Collection
CD/Cah de Dr	Les Cahiers de Droit (Canada)
CECO	Control of Exemption Clause Ordinance (Hong Kong)
CEE	Central and Eastern European
cf	confer (compare)
CFA	Currency of the CFA Franc Zone comprising all the OHADA Member States except the Comoros and Guinea
cGMP	current Good Manufacturing Practice

Ch	chapter
Ch D	Law Reports, Chancery Division (Great Britain)
Chan Prot	Protocol Amending the Convention on the Limitation Period in the International Sale of Goods of 4 April 1980 (A/CONF. 97/18, annex II), YB XI (1980), 162–4
Chi-Kent L Rev	Chicago-Kent Law Review
China Bus Rev	China Business Review (USA)
China L R	China Law Reporter (USA)
Chron	Chronique (France)
cic	culpa in contrahendo
CIDIP	Inter-American Specialized Conferences on Private International Law
CIETAC	China International Economic and Trade Arbitration Commission
CIF	cost, insurance, freight (IncotermINCOTERM)
CIM	Convention internationale concernant le transport des marchandises par chemins de fer/International Convention on the Carriage of Goods by Rail
CIP	carriage and insurance paid to (IncotermINCOTERM)
Cir	Circuit (United States Court of Appeals)
CIS	Commonwealth of Independent States
CISG	United Nations Convention on Contracts for the International Sale of Goods of 11 April 1980
CISG Austria	Internet database of Austrian decisions on the CISG (see bibliography)
CISG Belgium	Internet database of Belgian decisions on the CISG, University of Leuven (see bibliography)
CISG France	CISG France, Internet database of French decisions on the CISG, University of Saarbrücken (see bibliography)
CISG Pace	CISG W3 Database, Internet database, Pace University School of Law (see bibliography)
CISG Spain	CISG Spain and Latin America, Internet Database, Universidad Carlos III Madrid (see bibliography)
CISG-AC	Advisory Council of the Vienna Convention on Contracts for the International Sale of Goods (http://www.cisgac.com/http://www.cisg-online.ch/cisg/cisg-ac.html)
CISG-online	Internet Data Base of decisions and materials on the CISG operated by Prof Dr Ingeborg Schwenzer, LL.M at the University of Basle, Switzerland
Civ	Cour de Cassation, Chambre civile (Civil Chamber of the French Court of Cassation)
Civ Cir	Civil Circuit
CLJ	Cambridge Law Journal
CLOUT	Case Law on UNCITRAL Texts (see bibliography)
CLR	Commonwealth Law Reports (Australia)
CMEA	Council of Mutual Economic Assistance
CMR	Convention relative au Contrat de transport international de marchandises par route/Convention on the Contract for the International Carriage of Goods by Road (Geneva, 19 May 1956)
CO	Code of Obligations
Co	Company
COC	Court of Cassation
cod	cash on delivery

COFREUROP	Conditions for the national and international trade in fruit and vegetables whether fresh, frozen or intended for industrial use of October 1999 (see http://www.dfhw.de)
Col Sup Ct	Colorado Supreme Court
Colo Law	The Colorado Lawyer (USA)
Colum J Transnat L	Columbia Journal of Transnational Law (USA)
Colum L Rev	Columbia Law Review (USA)
COM	Document of the European Commission intended for communication to the public
Com	Cour de Cassation, Chambre civile, Section Commerciale (Commercial Chamber of the French Court of Cassation)
Com C	Commercial Code
Com int Ban	Comercio internacional Banamex (Mexico)
Com LJ	Commercial Law Journal (USA)
Com Cas	Commercial Cases (England & Wales)
COMESA	Common Market for Eastern and Southern Africa
Comp & Int LJ S Afr	Comparative and International Law Journal of Southern Africa
Comp C	Companies Law / Partnership Law
Comp LJ	Comparative Law Journal
Comp L Y B	Comparative Law Yearbook (USA)
Compromex	Comisión para la Protección del Comercio Exterior de México (Mexican Commission for the Protection of Foreign Trade)
Computer LJ	Computer Law Journal (USA)
Computer Law	The Computer Lawyer (USA)
Con PL	Consumer Protection Law
Conf	Conference
Conn B J	Connecticut Bar Journal (USA)
Conn J Int L	Connecticut Journal of International Law
Cons Fin L Q R	Consumer Finance Law Quarterly Report (USA)
Constr LJ	Construction Law Journal
Contemp Trends	Contemporary Trends (Great Britain)
Contr Imp	Contratto e Impresa (Italy)
Contr Imp E	Contratto e Impresa, Europe (Italy)
Convention Benelux	1973 <i>Convention Benelux Relative à la Clause Pénal</i> in force for Belgium, Luxembourg and the Netherlands
Cornell Int LJ	Cornell International Law Journal (USA)
Cornell L Rev	Cornell Law Review (USA)
Corp	Corporation
Corr giur	Corriere giuridico (Italy)
COTIF	Convention relative aux transports internationaux ferroviaires/ Convention concerning International Carriage by Rail of 5 May 1980
CPC	Codice di Procedura Civile (Italy)/Code de Procedure Civile (cf NCPG; France)/Code of Civil Procedure
CPCC	Code of Civil and Commercial Procedure
CPL	Consumer Protection Law/Civil Procedural Law
CPN	Cours de perfectionnement du notariat (France)
CPT	Carriage Paid To
CR	Computer und Recht (Germany)
CRL	Copyrights Law
Ct	Court
Ct App	Court of Appeals (USA)
Ct App Sup Ct Vic	Court of Appeals of the Supreme Court of Victoria

Abbreviations

Ct Arb	Court of Arbitration
Ct Int Trade	United States Court of International Trade
CTLR	Computer and Telecommunications Law Review
CTO	Combined Transport Operator
Cu der int	Curso de Derecho Internacional (USA)
Cum L Rev	Cumberland Law Review (USA)
CV	Capital Variable
CVIM	Convention de Vienne sur la vente internationale de marchandises (see CISG)
D	Recueil Dalloz Sirey (France)
D Chron	Recueil Dalloz Sirey, Chronique (France)
D Del	US District Court, District of Delaware
D IR	Recueil Dalloz Sirey, Informations Rapides (France)
D Kan	US District Court, District of Kansas
D M F	Le Droit maritime français (France)
D Minn	US District Court, District of Minnesota
D Ne	District of Nebraska
D NJ	US District Court, District of New Jersey
D P	Dalloz, Recueil périodique et critique mensuel (before 1941; France)
D RI	US District Court, District of Rhode Island
D Somm	Recueil Dalloz Sirey, Sommaires Commentés (France)
DAF	delivered at frontier (IncotermINCOTERM)
DAS	Digital Signature Act (Malaysia)
Das Recht	Das Recht, Supplement to Zentralblatt für Handelsrecht (Germany)
DB	Der Betrieb (Germany)
DCFR	2008 Draft Common Frame of Reference prepared by the Study Group on a European Civil Code
DDP	Delivered Duty Paid
DDR-AW/RiA	DDR-Außenwirtschaft, Supplement 'Recht im Außenhandel'
DDU	Delivered Duty Unpaid
Defensor Legis	Defensor Legis (Finland)
Del Law	Delaware Lawyer (USA)
Denkschrift	Denkschrift der deutschen Bundesregierung zum Entwurf eines Gesetzes zu dem Übereinkommen der Vereinten Nationen vom 11. April 1980 über Verträge über den internationalen Warenkauf (memorandum of the Government of the Federal Republic of Germany regarding the draft law on the CISG) (see bibliography)
Denkschrift zum EKG	Denkschrift der deutschen Bunderegierung zu den internationalen Kaufrechtsübereinkommen (memorandum of the Government of the Federal Republic of Germany regarding ULF and ULIS) (see bibliography)
DEQ	Delivered Ex Quay
Der com int	Derecho del comercio internacional (Columbia)
Der comp	Derecho comparado (Argentina)
Der neg	Derecho de los negocios (Mexico)
DES	Delivered Ex Ship
DH	Dalloz, Recueil hebdomadaire de jurisprudence (1924–40) (France)
Dick J Int L	Dickinson Journal of International Law (USA)
Dick L Rev	Dickinson Law Review (USA)
Dig Com L	Digest of Commercial Laws of the World (USA)
DIHT	Deutscher Industrie- und Handelstag/German Association of Chambers of Commerce and Industry

Dir	Directive
Dir com int	Diritto del Commercio Internazionale (Italy)
Dir comun sc int	Diritto Comunitario e degli scambi Internazionale (Italy)
Diss	Dissertation
Dist	District (USA)
DLR	Dominion Law Reports
DNotZ	Deutsche Notar-Zeitschrift Verkündungsblatt der Bundesnotarkammer
Doc	Conférence diplomatique sur l'Unification du droit en matière de la vente internationale, Den Haag, 2–25 April 1964, Actes et Documents de la Conférence, Bd. II: Documents, Ministère de la Justice des Pays-Bas (ed), Den Haag: Imprimerie Nationale (1966)
Doc dir comp	Documentacao e Direito Comparado (Portugal)
DÖV	Die Öffentliche Verwaltung (Germany)/public administration
DR	Deutsches Recht/German Law (1931–45)
Dr prat com int	Droit et pratique du commerce international/International Trade Law and Practice (Paris, New York)
Drake L Rev	Drake Law Review (USA)
DSL	Digital Signature Law (PRC)
DTI	Department of Trade and Industry
DtZ	Deutsch-Deutsche Rechts-Zeitschrift (Germany)
DtZ-Inf	Informationsbeilage zur Deutsch-Deutschen Rechts-Zeitschrift (Supplement to DtZ)
Duke LJ	Duke Law Journal
Duq L Rev	Duquesne Law Review (USA)
DZWir	Deutsche Zeitschrift für Wirtschaftsrecht
E	Entwurf (draft)
E & B	Ellis & Blackburn's Queen's Bench Reports
E 1958	1958 Draft of ULF
E 1976	see 1976 Geneva Draft
E 1977	see 1977 New York Draft
E 1978	see 1978 New York Draft
EAC	East African Community/East African Court
EAG	Einheitliches Gesetz über den Abschluß von internationalen Kaufverträgen über bewegliche Sachen of 17 July 1973 (see ULF)
EBIT	earnings before interest and taxes
EC	European Community
ECA	Electronic Commerce Act (Philippines)
ECB	European Central Bank
ECC	European Code of Contract drafted by the Gandolfi initiative/United Nations Convention on Use of Electronic Communication in International Contracts
ECCAS	Economic Community of Central African States
ECE	Economic Commission for Europe
ECJ	Court of Justice of the European Communities
ecolex	ecolex (Austria)
e-commerce	Electronic Commerce
e-Commerce Dir	Directive 2000/31/EC of the European Parliament and of the Council of 8 June 2000 on certain legal aspects of information society services, in particular electronic commerce, in the Internal Market
ECOWAS	The Economic Community of West African States
ECR	European Court Reports

Abbreviations

ECTA	Electronic Communications and Transactions Act
ED	Eastern District
ED Ky	US District Court, Eastern District of Kentucky
ED La	US District Court, Eastern District of Louisiana
ED Mich	US District Court, Eastern District of Michigan
ED NY	US District Court, Eastern District of New York
ED Pa	US District Court, Eastern District of Pennsylvania
edn	edition
ed/eds	editor/editors
EDI	Electronic Data Interchange
Edin L Rev	Edinburgh Law Review
EEC	European Economic Community
eg	exempli gratia (for example)
EG	Europäische Gemeinschaft/European Community (see EC)
EGBGB	Einführungsgesetz zum Bürgerlichen Gesetzbuch (Introductory Law of the German Civil Code)
EJLR	European Journal of Law Reform
EK G	Einheitliches Gesetz über den internationalen Kauf beweglicher Sachen of 17 July 1973 (see ULIS)
El Derecho	El Derecho (Argentina)
El Foro	El Foro (Mexico)
E-mail	Electronic Mail
Emory Int L Rev	Emory International Law Review (USA)
Emory J Int Disp Resol	Emory Journal of International Dispute Resolution (USA)
Emory LJ	Emory Law Journal
Enc D	Enciclopedia del diritto (Italy)
Enc Pub Int L	Encyclopedia of Public International Law
Energy LJ	Energy Law Journal (USA)
EPCL	Principles of European Contract Law
EPÜ	Europäisches Patentübereinkommen/European Patent Convention of 1973
ER	English Reports
ERA	Einheitliche Richtlinien und Gebräuche für Dokumenten-Akkreditiv/Uniform Customs and Practice for Documentary Credits (1983 Revision), ICC publication no 400
ERI	Einheitliche Richtlinien für Inkassi/Uniform Rules for Collections (1979 Revision), ICC publication no 322
ERPL	European Review of Private Law (Netherlands)
ESA	Electronic Signature Act (South Korea)
Esq	Esquire
et al	and others
et seq	et sequentes/et sequentia (and the following one/and the following ones)
ETA	Electronic Transactions Act (Singapore, Sri Lanka, Thailand, Vietnam)
etc	et cetera (and so on)
ETO	Electronic Transactions Ordinance (Hong Kong)
eUCP	Supplement to the Uniform Customs and Practice for Documentary Credits for Electronic Presentation, 2002 version
EuGVO	Council Regulation (EC) no 44/2001 of 22 December 2000 on jurisdiction and the recognition and enforcement of judgements in civil and commercial matters, see Brussels Regulation
EuGVÜ	EC Convention on Jurisdiction and the Enforcement of Judgments in Civil and Commercial Matters, see Brussels Convention

EuIPRÜ	EC Convention on the Law Applicable to Contractual Obligations (Rome 1980)
EuLF	The European Legal Forum
Eur Transp L	European Transport Law (Belgium)
European L Rev	European Law Review (Great Britain)
EuZW	Europäische Zeitschrift für Wirtschaftsrecht (Germany)
EvBl	Evidenzblatt der Rechtsmittelentscheidungen, in: Österreichische Juristen-Zeitung (seit 1946); vorher selbständig (1934–8); dann: Beilage zu 'Deutsches Recht' Teil C (DREvBl)
EVHGB	Verordnung zur Einführung handelsrechtlicher Vorschriften im Lande Österreich (Austria)
EWCA Civ	England and Wales Court of Appeals, Civil Division
EWG	Europäische Wirtschaftsgemeinschaft/European Economic Community (see EEC)
EWiR	Entscheidungen zum Wirtschaftsrecht (Germany)
EWS	Europäisches Wirtschafts- und Steuerrecht (Germany)
Ex	Court of Exchequer/Expiration
Exch	Exchequer Reports
EXW	Ex Works
F	Federal Reporter (USA)
F 2d	Federal Reporter, Second Series 1988–93 West's Federal Reporter, Second Series (USA)
F 3d	Federal Reporter, Third Series
F 3rd	West's Federal Reporter, Third Series (USA)
F Supp	Federal Supplement (USA)
F Supp 2d	Federal Supplement, Second Series
FAS	Free Alongside Ship
Fasc	Fascicolo (Italy)
FBI	Federal Bureau of Investigation
FCA	Free Carrier; Federal Court of Australia (see also Fed Ct Aust)
FCR	Federal Court Reports (Australia)
FD&C	Food, Drug and Cosmetic Act
Fed Ct Aust	Federal Court of Australia (see also FCA)
Fed Reg	Federal Register (USA)
FedCl	Federal Claims Reporter
FF	French Franc
ff	folios (and the following pages)
FHC	Federal High Court (Nigeria, United Arab Emirates)
FIATA	Fédération Internationale des Associations de Transitaires et Assimilés/ International Federation of Freight Forwarders Associations (Vienna 1926)
Fla B J	Florida Bar Journal (USA)
Fla Int LJ	Florida International Law Journal (USA)
FOB	Free On Board
Fordham Int LJ	Fordham International Law Journal (USA)
Fordham L Rev	Fordham Law Review (USA)
Foro it	Foro italiano (Italy)
Foro pad	Foro padano (Italy)
FPR	Familie Partnerschaft Recht
FRG	Federal Republic of Germany
FS	Festschrift
G com	Giurisprudenza commerciale (Italy)