

The CISG as a Model for Harmonisation, Convergence and Law Reform

6 & 7 January 2017
Centre for Law & Business
Faculty of Law, National University of Singapore



From left: djakhongir Saidov (United Kingdom), Hiroo Sino (Japan), Gary F. Bell (Singapore), Michael Greenhalgh Bridge (Singapore), Yesim Atamer (Turkey), Lauro Gama Jr. (Brazil), Eric E. Bergsten(United States), Ingeborg Schwenzer (Switzerland), Ulrich G. Schroeter (Germany), Christiana Fountoulakis (Switzerland), Jan Kleinheisterkamp (United Kingdom), Jan Ramberg (Sweden), Sieg Eiselen (South Africa).

On 6 and 7 January the Centre for Law and business hosted a conference entitled “**The CISG as a Model for Harmonisation, Convergence and Law Reform**”. The CISG (The *United Nations Convention on Contract for the International Sale of Goods*) is the most successful international treaty for the unification of substantive private law in the world. There are 84 countries that have adopted the CISG, including Singapore. Trade between these 84 countries represents about two thirds of all international trade. The CISG is widely used by merchants around the world as their law of sale. Courts and arbitral tribunals around the world interpret and apply the CISG.

The CISG is also a model for other harmonisation and law reform projects. Many elements of the CISG have been adopted by national laws around the world – notably the Chinese contract law adopted many provisions of the CISG verbatim. Many CISG solutions have also been adopted by many other

harmonisation projects such as the UNCITRAL Model Law on arbitration, the UNIDROIT Principles of International Commercial Law etc. This conference focused on the ways in which the CISG influences harmonisation and law reform.

The papers presented were as follows:

- Prof. Dr. Ingeborg Schwenzer
Universität Basel, Switzerland
“The CISG Benefits and Concerns”
- Dr. Jan Kleinheisterkamp
London School of Economics, U.K.
“The CISG and the PICC as Models for Convergence - Or Transnational Will-O’ -The-Wisps?”
- Prof. Dr. Ulrich G. Schroeter
University of Mannheim, Germany (now of Universität Basel, Switzerland)
“Does The 1980 Vienna Sales Convention Reflect Universal Values? The Use Of The CISG as a Model and Regional Specificities”
- Prof. Dr. Yesim M. Atamer
Istanbul Bilgi University, Turkey
“The Right to Cure in the CISG: A Model For Law Reform?”
- Prof. Gary F. Bell
National University of Singapore
“The CISG as a Model of Harmonisation for ASEAN?”
- Prof. Hiroo Sono
Hokkaido University, Japan
“Impact of the CISG on the Civil Code Reform in Japan”
- Prof. Sieg Eiselen
University of South Africa
“The CISG in Africa”
- Prof. Dr. Lauro Gama Jr
Pontifical Catholic University, Rio de Janeiro, Brazil
“The CISG as Inspiration for the Development of the Brazilian Domestic Law of Sales”
- Prof. Alejandro Garro
Columbia Law School
“The CISG as a Model for Law Reform in Latin America and as a Source of Inspiration for Regional Harmonization and Uniformity in Cross-Border Transactions”
- Prof. Dr. Shiyuan Han
Tsinghua University, P.R. China
“Recodification of Sales Law in China: Time to Reevaluate the Impact of the CISG on Domestic Legislations”
- Prof. Jan Ramberg
Stockholm University, Sweden
“The CISG as Inspiration for New Scandinavian Sales Acts”
- Prof. Michael Greenhalgh Bridge
National University of Singapore
“Good Faith, the Common Law and the CISG”
- Prof. Christiana Fountoulakis
Université de Fribourg, Switzerland

“The CISG and Robots”

- Prof. Djakhongir Saidov
King’s College, London, UK.

“Cases on the CISG Decided in China: Conformity of Goods and Damages”

The conference was well attended by 34 participants, from Singapore and abroad.

The conference was followed by the annual meeting of the CISG Advisory Council which was also hosted by the Centre for Law and Business.

There is however no supreme international court that could give a uniform interpretation to the CISG and we are therefore often left with contradictory interpretations of the CISG by national courts and arbitral tribunals. To remedy this lack of uniformity in the interpretation of the CISG, a group of academics from diverse legal traditions and backgrounds have formed the “CISG Advisory Council” (hereinafter “The Council”, see <http://www.cisgac.com/index.php>) which provides opinions on controversial issues relating to the interpretation of the CISG. The members of the Council are among the very top academics in the field of the CISG and their opinion carries academic authority.



Professor Tan Cheng Han (Chairman, Centre for Law & Business, NUS Law) and Lauro Gama Junior (Pontifical Catholic University of Rio de Janeiro, Brazil) in conversation with conference participants.



Hiroo Sono (Hokaido University, Japan) in conversation with conference participants.



Hiroo Sono (Hokaido University, Japan) in conversation with conference participants.



From left: Ingeborg Schwenzer (Universität Basel, Switzerland) and Jan Kleinheisterkamp (London Schools of Economics, United Kingdom)



Lauro Gama Jr. (pontifical Catholic University of Rio de Janeiro, Brazil)



From left: Michael Greenhalgh Bridge (National University of Singapore) and Jan Ramberg (Stockholm University, Sweden)



From left: Hiroo Sono (Hokkaido University, Japan), Yesim Atamer (Istanbul Bilgi University, Turkey), Ulrich G. Schroeter (University of Mannheim, Germany), Sieg Eiselen (University of South Africa)



From left: Hiroo Sono (Hokkaido University, Japan), Yesim Atamer (Istanbul Bilgi University, Turkey), Ulrich G. Schroeter (University of Mannheim, Germany), Sieg Eiselen (University of South Africa)



Participants of the CISG conference 2017



From left: Jan Kleinheisterkamp (London Schools of Economics, United Kingdom), Sieg Eiselen (University of South Africa), Ingeborg Schwenzer (Universität Basel, Switzerland)



Yesim Atamer (Istanbul Bilgi University, Turkey) on the left and Jan Ramberg (Stockholm University, Sweden) on the right speaking to CISG participant in the middle.



From left: Jan Ramberg (Stockholm University, Sweden), Ulrich G. Schroeter (University of Mannheim, Germany), Lauro Gama Junior (Pontifical Catholic University of Rio de Janeiro, Brazil) and Jan Kleinheisterkamp (London Schools of Economics, United Kingdom).



From left: Ingeborg Schwenzer (Universität Basel, Switzerland) and Gary F. Bell (National University of Singapore)