

# Book Review

## **REVIEW OF *INTERNATIONAL COMMERCIAL ARBITRATION: INTERNATIONAL CONVENTIONS, COUNTRY REPORTS AND COMPARATIVE ANALYSIS* (2ND ED., 2021), EDITED BY STEPHAN BALTHASAR**

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### **ABSTRACT**

*Despite the apparent success of the New York Convention, the United Nations Commission on International Trade Law Model Law on International Commercial Arbitration (hereinafter “Model Law”), and the many widely used soft law guidelines in promoting a globally harmonized arbitration regime, arbitration law and practice remain far from fully harmonized. Arbitration legislation, jurisprudence and legal practice continue to differ from jurisdiction to jurisdiction, and even where harmonized laws and principles have been adopted, courts in various jurisdictions have taken different approaches to interpreting and applying them.*

*Stephan Balthasar’s book provides a well-researched comparative analysis of the New York Convention, Model Law and local arbitration laws and practices in sixteen of the most important seats of arbitration in the world. It reminds international arbitration practitioners that arbitration, for all of its international characteristics, remains embedded in the many national legal systems and cultures in which it operates, and these local differences*

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*can have a decisive impact on the outcome of the arbitration. It is essential reading for arbitration lawyers and in-house counsel as they are confronted with the many jurisdiction-specific issues which come into play at various stages of the arbitration and enforcement proceedings. It is hoped that future editions of this valuable work will be expanded to cover additional jurisdictions in Asia, Latin America, Africa and the Middle East.*

**KEYWORDS:** *international commercial arbitration, harmonization, uniformity, international conventions, Model Law, New York Convention, soft law guidelines, comparative analysis, country reports, national arbitration legislation, local differences, arbitration agreement, arbitration procedure, recognition and enforcement, Austria, Belgium, Brazil, China, England and Wales, France, Germany, Hong Kong, India, the Netherlands, the Russian Federation, Singapore, Spain, Sweden, Switzerland, the United States*