International Workshop

3-4 Juin, Maison franco-japonaise (Tokyo)

Global Law and Global Legal Theory

Academic Knowledge in Question

Organisé par :

Institut français de recherche à l'étranger, UMIFRE 19

(CNRS – Ministère français des Affaires étrangères et européennes)

Avec le soutien du :

Fonds d'Alembert (Culturesfrance)

En partenariat avec le :

Clarke Program in East Asian Law and Culture (Cornell University)

Et la collaboration de :

GLSN *Global Legal Studies Network* / Réseau Mondialisation du droit - *(Fondation Maison des Sciences de l'Homme)*

I. Objectifs

Le workshop international des 3-4 juin 2011 organisé par l'Institut Français de Recherche à l'Étranger (Maison franco-japonaise) est le troisième évènement scientifique d'une série consacrée à la « Mondialisation du Droit ». Il réunit cette année des chercheurs français, japonais, chinois et américains. Il est organisé avec le soutien du Fonds d'Alembert, en partenariat avec le *Clarke Program in East Asian Law and Culture* (Cornell University) et avec la collaboration de *GLSN Global Legal Studies Network - Réseau Mondialisation du droit* (Fondation de la Maison des Sciences de l'Homme).

Le workshop des 3 et 4 juin 20011 a un double objectif:

- ✓ poursuivre la réflexion sur les changements récents de la pensée juridique et particulièrement du comparatisme ;
- ✓ discuter et analyser concrètement certaines des catégories émergentes dans différents travaux en cours, par exemple ceux de « droit créole », de « constitution privée », de « droit traduit », d'« espace normatifs »[1].

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[1] Sur ces nouvelles catégories de la pensée juridique globale, voir en annexe le texte d'introduction au Workshop (« Academic Knowledge – Three Views on Global Law and Global Legal Theory ») rédigé par Gilles Lhuilier (Professeur de droit privé, Université Bretagne-Sud), qui travaille à une réflexion sur la pensée juridique mondiale, notamment dans le cadre de sa recherche à l'Institut d'Études Avancées de Nantes (2010); voir aussi son texte disponible en francais et enanglais « Analyse de la mondialisation du droit », mis en ligne sur le site du réseau qu'il coordonne, « Global Legal Studies Network – Mondialisation du droit »: http://www.glsn.eu. Lors du colloque international de juin 2009 -Maison franco-japonaise- Gilles Lhuilier a présenté la notion de *décentrement* et développé – s'agissant d'un objet spécifique: les « contrats globaux » – une réflexion sur les « nouveaux espaces normatifs transnationaux ».

II. Problématique

La mondialisation du droit – sa « globalisation » – est à la fois un « décentrement » des lieux de production du droit et un décentrement de la pensée du droit elle même.
Pour appréhender les mutations juridiques actuelles et les voies par lesquelles le droit se mondialise, la pensée juridique tend à s'émanciper des cadres nationaux, voire même des traditionnelles « aires culturelles » continentales (*Common Law*, Europe, Afrique, Asie…) familières aux juristes comparatistes. S'affirme une pensée juridique de plus en plus « mondiale », parfois désignée en anglais par des termes délimitant non plus une zone géographique, mais un nouveau champ scientifique: les *Global Legal Studies*, qui élargissent considérablement le champ de la pensée juridique, en diversifient les objets et conduisent à renouveler les aires d'analyse du droit. Les *Global Legal Studies* se caractérisent en effet par une ouverture aux sciences sociales (*« Law and... »*). Elles ne se concentrent pas sur les seuls textes positifs émis par les autorités politiques, mais ont pour objet une pluralité de sources dont elles mettent en avant les propriétés « dialogiques ». Enfin, elles sont définies en dépassement d'une vision continentale du droit (ou par grandes « aires juridiques » : Europe, *Common Law*, Afrique, Asie, ...). Tout en rendant manifeste les multiples figures que le droit positif revêt dans un contexte de globalisation, cette pensée juridique mondiale tente aussi d'appréhender plus finement la diversité des significations du droit.

Le workshop international des 3 et 4 juin pose la question de savoir s'il existe une pensée juridique « globale » – entendons: non pas une *pensée unique* sur la mondialisation du droit, mais une pensée globale dans ses méthodes et objets communs. Les participants examineront très concrètement cette pensée « globale »: « Quelles sont nos pratiques, quels sont nos concepts… bref: *what are we doing ?* ». La réflexion portera – notamment – sur les mécanismes d'articulation entre différents espaces de normativité et sur les processus de « créolisation normative ». Parmi les nombreuses questions soulevées: dans quelle mesure la réflexion sur la mondialisation du droit et la pluralité juridique contemporaine (non pas au sens de l'anthropologie traditionnelle du droit, mais comme articulation complexe de différents espaces normatifs) contribue-t-elle au renouvellement épistémologique du droit comparé lui-même (apparition de nouveaux paradigmes, dépassement des classifications, redéfinition des processus d'hybridation juridique, ...)?

III. Déroulement

- Pour préparer ce workshop, une discussion entre les participants sera ouverte deux semaines avant (via *mailing list*). Un court texte de Gilles Lhuilier leur sera adressé afin d'ouvrir la discussion: ***"Academic Knowledge – Three Views on Global Law and Global Legal Theory (Annelise Riles, Kō Hasegawa, Gilles Lhuilier)"***

  (voir annexe)

- L'originalité de ce workshop consiste à examiner, tour à tour ou simultanément, des notions théoriques (juridiques) *et* des objets concrets (de droit positif), parmi les plus sensibles à la globalisation.
  Il réunit une grande diversité de juristes (privatistes et/ou publicistes, spécialistes du droit interne ou du droit international, théoriciens du droit, comparatistes, ...) – en l'occurrence, japonais, français chinois et américains.
  Le format dynamique pour lequel nous optons doit favoriser l'interactivité entre les participants. C'est pourquoi la formule de la table ronde sera privilégiée.

- Pour poursuivre ce workshop, le *Clarke Program in East Asian Law and Culture* (Professeur Annelise Riles) propose d'ouvrir en ligne une discussion, pendant quelques semaines après le workshop, dont les principaux éléments pourront faire l'objet d'une publication ultérieure.

IV. Organisation

Maison franco-japonaise de Tokyo et Université de Tokyo
(Salle 601 de la MFJ)

Vendredi 3 juin - Samedi 4 juin

Journée du 3 juin : 9h00-12h00 / 14h00-18h00

Matinée du 4 juin : 10h00-13h00

- Organisateur: **Institut français de recherche à l'étranger (UMIFRE 19)**

- Partenariat: ***The Clarke Program in East Asian Law and Culture* (Cornell University)**

- Collaboration: **GLSN *Global Legal Studies Network* Réseau Mondialisation du droit – (Fondation de la Maison des Sciences de l'Homme)**

- Principaux Sites Internet couvrant la manifestation :

  - Site de la Maison franco-japonaise (www.mfj.gr.jp/recherche/recherche/)
  - Site de l'Université Cornell, Law School (www.lawschool.cornell.edu/)
  - Site du CEFC (www.cefc.com.hk)
  - Université d'Hokkaido (www.hokudai.ac.jp/en/)
  - Global Legal Studies Network (GLSN) (http://www.glsn.eu)

Langue de travail : Anglais

<u>INTERVENANTS</u>

Annelise RILES, Professeur, Cornell University, *Clarke Program in East Asian Law and Culture*
Gilles LHUILIER, Professeur, Université de Bretagne-Sud
Kō HASEGAWA, Professeur, Hokkaido University
Xingzhong YU, Professeur, Chinese University of Hong-Kong
Isabelle GIRAUDOU, Chercheur, Institut français de recherche à l'étranger
Yasunori KASAI, Professeur, Tokyo University
Emi MATSUMOTO, Professeur, Niigata University
Keigo KOMAMURA, Professeur, Keio University
Noboru KASHIWAGI, Professeur, Chuo University
Hiromi UEDA, Professeur, Asia University
Thomas BRISSON, Professeur associé, Tsukuba University

(notamment…)

<u>Organisation</u> : **Isabelle GIRAUDOU**

V. ANNEXE *Working paper*

*Ce « working paper » rédigé par **Gilles Lhuilier** est destiné à ouvrir la discussion du Workshop des 3-4 juin 2001.*

Academic Knowledge

Three Views on Global Law and Global Legal Theory **(Annelise Riles, Kō Hasegawa, Gilles Lhuilier)**

Is there a global legal theory? Not a unique theory on global law, but a global theory of law, a theory made global through its common objects and methods? Such a question represents a kind of ethnological study on the astonishing tribe of global "academics", their uses and practices, that is to say their "local knowledge" to quote the ethnologist Cliford Geertz.

To start with, it is now obvious that contemporary legal thought is undergoing a profound mutation qualified by the French epistemologist Bruno Latour as "a passage from law as an institution to law as an enunciation"[2]. Now, a very strong "coherentist" stream is building legal thought on a unique theoretical pattern, with a semiological origin, in spite of extremely diverse sources, comparisons and established theoretical systems. This new idea shows an evident opening to social

[2] B. Latour, La fabrique du droit. Une ethnographie du Conseil d'État, Paris, La Découverte, 2002.

sciences ("Law and…"). Concepts are therefore being deeply renewed and, above all, the legal is being widened, no more limiting itself to formulating questions about legal rules, but also questioning their relations to culture or cultures, as well as individual or collective identities.

This slow but now irreversible epistemological break, from a pattern inspired by the sciences of nature to one which is closer to the sciences of language, is linked to the present globalisation of legal thought which, for the past thirty years, has been marked by an increased circulation of these new wide-opened components of legal thought, issued by interdisciplinary theories travelling from continents to continents, and enabling, at last, the rise of a already worldwide, and not only western, point of view. The emergence of this "world legal thought" is linked to new intellectual shifts and journeys.

But can we describe more precisely this emerging global theory, not as a global "substantive" theory, of course, but as a set of common academic practices?

I make the hypothesis that international – global – legal theories are now facing the "refiguration of social thought" described twenty years ago by the anthropologist Cliford Geertz in his 1980 article *"Blurred Genres: The Refiguration of Social Thought".*

Some of Geertz's tricks are now commonly used by legal academics sometimes without even knowing it: a semiotic /interpretative approach, but also a "microscopic approach" (the small facts speaking to large issues), the assertion that "culture" is context and that theory must be "actor oriented", the emphasis on "words" who are part not only of specific concepts but a mixture of ideas, with multiple meanings, expressing a common way to imagine the reality; and – last but not least – a pluralism, neither state centered nor "culture centered", the actor contributing to defining the limits and the meaning of what I called "normative spaces", those local techniques which work on the basis of local shared knowledge…

To quote some old texts of Geertz's allows us to feel the current relevance of his works: "*The concept of culture I espouse… is essentially a semiotic one. Believing, with Max Weber, that man is an animal*

suspended in webs of significance he himself has spun, I take culture to be those webs, and the analysis of it to be therefore not an experimental science in search of law but an interpretative one in search of meaning. It is this explication I am after, construing social expressions on their surface enigmatical »3.

And the image of cobwebs has nothing in common with "systems" or "order", all the work of Geertz being an escape from the order, a decentring of legal theory: "*Interpretative explanation trains its attention on what institutions, actions, images, utterrances, events, customs, all the usual objects of social-scientific interest, means to those whose institutions, actions, customs, and so on they are. As a result, it issues not in laws like Boyle's or forces likes Volta's, or mechanisms like Darwin's, but in constructions like Buckardt's, Weber's, or Freud's: systematic unpacking of the conceptual world in which Condottierre, Calvinists, or paranoids live* »4.

Well… But how can Geertz be used today in the academic field of global law studies? Let's take three examples of recent works: the last book by Annelise Riles on the financial markets, the seminal article by Kō Hasegawa on Japanese law as a "creole law", and my current work on international contracts as "normative spaces".

Firstly, Annelise Riles.

Her last book is about the meaning of globalization. But its method is ethnographic, and Annelise Riles quotes explicitly Geertz's 1973 book "*Thick description: toward an interpretative theory of culture"*. And the title of Annelise's book, "*Collateral knowledge"* can also be read as an implicit quotation of Geertz's main work, "*Local Knowledge"*. If she presents a new theory of law and market, it is purposely a "theory close to the ground", building its analytical categories at close proximity to those of market and regulatory practices ant it does so inductively rather than deductively.

She follows this up and goes further in her main idea in her

[3] C. Geertz, The Interpretation of Cultures, New York, Basic Books, 1973, p. 5.

[4] C. Geertz, "Blurred Genres. The Refiguration of Social Thought", *American Scholar*, 1980, Spring, p. 165.

article "*The Anti-Network: Global Private Law, Legal Knowledge, and the Legitimacy of the State"*[5]. She stresses that the academic discussion about global law is not pertinent when it opposes private international norms build by the merchants to the laws of the states. In her mind there is such a thing as "global law without state" only if the analysis relies on "rules" and institutions, but not if you focus on "norms", a broader and practical understanding of what "law" means. She argues that rather than focusing on how global private law is or is not an artifact of state power, a body of private norms, or a coherent legal system, we should view global private law as a set of institutions, actors, doctrines, ideas, documents, that is, as a specialized set of knowledge, practices.

And in so doing, in her book, with the global market appears a (global) space of shared practices, a common world, a "private constitution", neither entirely private nor public: "Collateral financial governance is also, I argue, *a set of routinized but highly compartmentalized knowledge practices, many of which have a technical legal character"* [6].

She analyses a little financial technique, the Global Collateral ("*sûretés*" in French), which appears to be in fact at the root of the financial market, being the safeguard of swap transactions. No swap without security, without collateral. And, this quote from her article stresses the novelty of her approach: « *In the simple technology of collateral, this nexus of paper documents, legal theories, legal experts, clerical staff, computer technologies, statutes and court decisions, then, are encapsulated some very grand hopes. As a transplanted legal technology, collateralization is paradigmatic of global private law solutions. Although collateral is rooted in multiple bodies of national law, such as bankruptcy codes, it is designed to be in the first instance a tool of self-help. It also is intended to serve as a blueprint for relationships, what I will call a 'private constitution'"*[7].

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[5] A. Riles, « The Anti-Network: Global Private Law, Legal Knowledge, and the Legitimacy of the State ». *American Journal of Comparative Law*, Vol. 56, No. 3, 2008; Cornell Legal Studies Research Paper No. 07-025

[6] *Op. cit.*, p. 10.

[7] *Op. cit.*, p. 7.

Secondly, Kō Hasegawa.

Since the publication of his main article – "Incorporating Foreign Legal Ideas Through Translation"[8] – the work of Kō Hasegawa is sometimes assimilated to the "legal polycentricity" movement[9]. The "legal polycentricity" is a post-modern theory of globalization which stresses at the same time the "polycentricity" of law as a law "generated by numerous centers" in a global world, and a law from the point of view of the person, the actors, too often excluded from the theory of law [10]. Called *"Hō no kureōru to shutaiteki hōkeisei no kenkyū"* (A Study on the Creole and the Agency Formation of Law), the research programme directed by Kō Hasegawa tries to characterize the normative exchanges between four "regions" (South East Asia, Europe, North America, and Japan)[11].

But Kō Hasegawa builds a very singular theory of law as "interpretation", in order to study the construction of Japanese law under the influence of foreign law, and in so doing he renews the old fashioned concepts of comparative law. He uses the semiotic metaphor of "creole law", maybe as an implicit homage to the "polyglot discourse" of Geertz[12]. And Hasegawa's work stresses the importance of some words, "words" which are part not only of a specific concept but a mixture of ideas, with multiple meanings, expressing a common way to imagine the reality, as Geertz did with the Arab words *haqq* or the Sanscrit *dharma*, which came from different "moral worlds" and rely on different conceptions of law[13]. But it is true that his theory of Japanese law as a translation has less to do with the theory of translation than the theory of law, either the American style theory of Dworkin or the Japanese theory which stresses the particular role of the actor – the translator – according to

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[8] In A. Halpin & V. Roeben (eds.), Theorizing the Global Legal order, Oxford, Hart Publishing, 2009, pp.88-89.

[9] Legal Polycentricity: Consequences of Pluralism in Law, Hanne Petersen *et al*. eds., Dartmouth Pub. Group, 1995; Surya P. Sinha, Legal Polycentricity and International Law, North Carolina, Carolina Academic Press, 1996.

[10] H. Petersen, Knitted law: Norms and Values in Gendered Rule-Making, Dartmouth, Aldershot.

[11] Japan). www.juris.hokudai.ac.jp/~hasegawa/lcreole/en_index.html

[12] Geertz, *op. cit*. 1986, p. 226.

[13] *Op. cit*., p. 230.

the specificity of Japanese writing[14] : "*I think that Japanese modernization of law is to be characterized as the legal amalgamation through translation: Japanese intellectuals attempted not transplanting European law but rather grapping it for Japanese society. Indeed, they tried to understand and introduce Western ideas and values into Japanese society principally to enlighten and westernize it. But that was a selective incorporation, which made the Japanese legal system an organic unit of heterogeneous legal ideas and values. Here we should ideally distinguish the multi-layered legal system from the organically combined or hybrid legal system as in the case of Japan that I am discussing. This distinction is concerned with the totality of translation in the process of law-making. In the case of Japan, the main legal codes were not simple transplants from European law but rather the reconstruction of various European laws through translation, which includes not only the adaptive modification but also the critical discarding of European legal ideas and values. In addition, the operation of the legal system in Japan is conducted through the traditional sense of justice, ie, of harmony or equitability. Even if the legal provision in question was derived from a similar Western one, the understanding and application of it is curbed with the mind that ordinary Japanese people tend to appreciate by their own valuational sense* »[15].

Thirdly, Gilles Lhuilier (myself!).

I'm currently interested in the common knowledge of lawyers and heads of Transnational corporations that they use in the elaboration, writing and implementation of international contracts[16]. This knowledge obviously tends to organize the obligations between the parties but

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[14] Especially Kitamura Ichiro (1987), Noda (1966), etc. See Isabelle Giraudou, « Droit Japonais et Traduction. Une rupture épistémologique dans le comparatisme juridique? » (Japanese Law and Translation – An Epistemological Shift in Comparative Law?), in *Ebisu-Revue d'Études Japonaises*, to be published (n. 46, 2011).

[15] Kō Hasegawa, « Incorporating Foreign Legal Ideas through Translation », in A. Halpin & V. Roeben (eds.), Theorizing the Global Legal Order, Oxford, Hart Publishing, 2009, pp.88-89.

[16] GLOBEX (Recherches pluridisciplinaires sur la mondialisation : Contrats globaux et nouvelles régulations sociales) ». See : http://www.mshb.fr/accueil/la_recherche/pole_gouvernance_dans_les_institutions_publiques_et_privees/globex)

moreover to chose the law binding the parties, to shape a group, to organise a supply chain.... But international legal practices are very far from the classical presentation of the conflict of law concept, made from the state perspective, the perspective of the judge who tries to « localise » the contract. On the contrary, the private actors now « localise » themselves on singular « normative spaces ». The old concepts of international law, which were all "state centered", are now questioned by the globalization of law. The "mobility" of the private actors is changing the concept of territoriality of law, the concept of choice of law, of public order or even the concept of legal order. To be able to describe their practices we have to find some new definitions or to twist the old definitions of the choice of law theory.

I have called this new set of practices "law shopping" in a broad sense[17]. - One: *the incorporation.* The *lex societatis* – but also the law applicable to the board – being the law of the incorporation, the transnational corporations have many ways to use the "Delaware effect", often for escaping tax law, bankruptcy law, freezing asset action…or simply the identification of the shareholders. This old « law shopping » which has no limits in some regional areas (such Europe), is the conceptual model of all the other techniques.

- Two: *subsidiaries*. The creation of subsidiaries is also a common form of law shopping, an easy way to escape public order law such as criminal law, transnational companies not being a legal person as a « group », subsidiaries allowing "groups" to hide under the corporate veil.

- Three: *joint ventures*. To draw the limits of a group with a joint venture between a subsidiary and a company incorporated in a so-called « tax haven » (which are also "secret havens") is an easy way to make a soft choice of the law, the joint venture having no existence from a tax point of view. And the remaining cash can be used for « non-conventional commercial practices ».

[17] G. Lhuilier, « Le concept de « Law shopping ». (Droit international privé, droit social, droit de l'environnement), in Droit du travail et droit de l'environnement. Regards croisés sur le développement durable, Paris, édition Lamy-Wolters Kluwers, 2010 ; « Law shopping (La redéfinition du choix de la loi par la pratique du droit international des affaires)», in Les groupes internationaux de sociétés: nouveaux enjeux, nouveaux défis, sous la direction de Xavier Boucobza, Paris, Economica, 2007.

- Four: *the sub-contracting*. Outsourcing can be defined as an operation to close a production site and transfer it abroad to enjoy better legal systems for the employer. Outsourcing is less an act of management than a technique of choice of law, a technique of "law shopping". This new legal technique is a reaction against the "publicising" of the rule of conflict of law. For in all industrialized countries *favor laboris* has significantly limited the scope of the choice of law. The desire to protect employees has realized what the internationalists called a "coloring" of the rules of conflicts of law that has ended their so-called "neutrality". But outsourcing can be reached by some other very simple legal action: either the incorporation of a subsidiary abroad or – more simply – outsourcing by subcontracting, as Nike does for example.

-Five: *The contract as a law*. In the recital or the operative part of the contract, professional definitions, rules or obligations are often longer than the international convention on sale of goods.

-Six: *the choice of law, « dépeçage » and the « contract without law »*. International contracts have nowadays sometimes some very sophisticated choice of law clauses, such as those choosing an international convention like ICSID, and a soft law text, a professorrecht as the Unidroit Principles in order to fill the gap of the international convention. In so doing, they build an international code of sales contracts mixing international convention, soft law, and the principle of the choice of law by the parties.

-Seven: *Contractual public order*. This concept is used to build the "supply chain" and to introduce clauses, from the end of the chain to the beginning, through labelling and the certification of the supply chain, to make sure that some mandatory law is really binding."

-Eight: *the forum shopping*. Very classical !

-Nine: *contractual mediation order*. The international contracts organise several negotiations, transactions, mediations inside the contract itself, often through *ad hoc* or permanent dispute board.

-Ten: *the choice of the site of the arbitration*. To choose the site of the court of arbitration is a way to choose the procedural law of arbitration.

-Eleven: *freedom or the arbitrator*. To quote Berthold Goldman's well known sentence: *"l'arbitre n'a pas de for / arbitrator has no for",* is enough to reminds everyone that the rules of conflict of law are

mandatory for the arbitrators who are free to chose the law applicable to the contract. To choose arbitration is to choose to stay away from public judges but also from the rules of conflict of law.
-Twelve: *mobile public order*. International arbitrators are now practicing what I call the concept of "mobile" public order, the unique public order taken into account by the arbitrator being the public order of the place –the state- of the *exequatur*. The significance of public order is then deeply renewed if it depends only on the place of the assets of the parties…

All those practices (the so-called "law shopping") constitute what I called "normative spaces". Normative spaces have two significations. Firstly, normative spaces are a *set of* "norms". These set of "norms" is constituted by practices of law shopping which allow merchants to designate the "rules" binding their relations, that is to say – to use Annelise Riles's terms - of routinized but highly compartmentalized knowledge of practices, many of which have a technical legal character. Secondly, normative spaces are also a set of "rules" designated by lawyers, that is to say national laws, international treaties and conventions, soft laws…

Each international contract is then a "web" – to use Geertz's terminology. Each "normative space" refers at the same time to the ability to spin the web – that is to say, the boundaries of the applicable chosen law – and the web itself, that is to say, the chosen law. It is neither a private commercial order (a new *lex mercatoria*), the applicable laws being mainly national laws; nor a legal order, national or international, the boundaries of the law being drawn by the merchants themselves.

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Between theses three works, some obvious differences appear, sometimes stressed by the authors themselves[18]. These differences

[18] Kō Hasegawa, "How Can Law Hold Hope in Cultural Complexity? – Critical Comments on Professor Annelise Riles' View of Law and Culture" Working Paper.

obviously lie sometimes in “tribal knowledge”, some academics being closer relatives to the ethnologists’ tribe, some to the philosophers’ tribe, others to the tribes of internationalists or commercialists. But all these works are nevertheless representative of the merge of a global legal theory that realises a “decentring” of the theory of law[19].

Questions rise however: the importance of the legal technicalities as an autonomous language, the fall of the theory, the local dimension of the theory, the signification of the renewed concept of culture, or such elaborations as “private constitution” or “normative spaces” and their many uses – for example in order to renew legal comparative legal studies…

Gilles Lhuilier

Academic Knowledge
***Three Views on Global Law and Global Legal Theory* (Annelise Riles, Kō Hasegawa, Gilles Lhuilier)**

is a working paper written to open the discussion between the participants to the International Workshop organized by Institut français de recherche à l’étranger (CNRS-MAEE), Maison franco-japonaise (Tokyo - June 3-4, 2011). See http://www.mfj.gr.jp/agenda/

[19] See http://www.msh-paris.fr/recherche/aires-geographiques/monde/le-reseau-glsn/ or http://www.glsn.eu