ing accuracy, succinctness and clarity. Indeed, Dannemann has achieved his task in a truly comparative way since his presentation of German law is invariably done in juxtaposition to English law. If a complaint is to be voiced against this exercise it is that Dannemann's style occasionally becomes excessively compact. For instance, his subsection on the "battle of forms" (pp.17–19) rightly, in my view, eschews the complexities of German property and contract law but it is, nevertheless, still pretty dense; and only his most knowledgeable and intelligent readers will be able to follow his rich argumentation which, at the end of this section, is made even more complex by being developed in a "conflicts" setting. Occasionally Dannemann also renders German terms quite literally, with the result that some confusion may ensue. Thus, *Anscheinsvollmacht* is rendered as apparent authority (following, perhaps, Tony Weir, who in his classic translation of Zweigert and Kötz uses the term "ostensible" authority). In the common law, however, ostensible or apparent authority is a term of art and implies that the *principal* has made a representation to the third party. In German law, on the other hand, *Anscheinsvollmacht* exists where the so-called principal is negligently *un*aware of the so-called agent's acts/statements on his behalf. The legally neutral term "pretended authority" might thus be clearer to an English readership.

These, however, are the customary quibbles one expects from reviewers. If this "tradition" has been maintained here, it is only in order to make more credible this reviewer's admiration for Dannemann's work. Comparative lawyers will be hearing more of Dannemann. This is a confident prediction, not the expression of a hope!

B. S. MARKESINIS

Europäische Privatrechtsvereinheitlichung heute und morgen. By JOCHEN TAUPITZ. [Tübingen: J. C. B. Mohr (Paul Siebeck). 1993. x + 92 pp. ISBN 3–16–146060–x. DM 59]

Europäische Privatrechtsvereinheitlichung heute und morgen gives a good overview over the problems connected with the harmonisation of civil law within the context of European law. It describes general characteristics of legal harmonisation and identifies the different forms of non-legislative and legislative harmonisation. In a special chapter on the existing types of legal harmonisation within the European framework, the author describes the dominating role of legislative harmonisation and discusses the problems related thereto. He identifies the predominantly legislative harmonisation as the main cause of national legal uncertainty because instead of creating more uniformity in various different legal fields it invariably leads to more and more complex and detailed legal provisions, thus making European law more and more complicated. The author also criticises the European legislative harmonisation as lacking democratic legitimacy because—due to the fact that the European Parliament has but a consulting role in the legislative process—the law-making executive European organs acquire a degree of power which substantially exceeds that of the respective national organs of the member States. As a result, the author calls for a re-evaluation of the traditional type of legal harmonisation in Europe. He stresses the importance of the principle of subsidiarity in the context of harmonisation and consequently advocates the restriction of harmonisation to those fields in which it is really necessary. Also, he suggests laying a greater emphasis on the harmonisation of the provisions of the law of conflicts because it is an underlying characteristic of the laws of conflict to recognise the structural equality of the different legal systems. The value of such an approach to harmonisation lies in the fact that, in those areas in which a harmonisation of substantive law cannot be achieved, a harmonised law of conflicts guarantees that cases which touch a foreign legal system will be judged according to the provisions of the same particular legal system, no matter to which

forum the respective court belongs, for all the courts apply the harmonised provisions of the laws of conflict.

On the whole, the book is well reasoned and suggests valuable solutions; it can therefore be recommended for everyone who is interested in acquiring a quick yet thorough overview of the problems related to the harmonisation of European law.

SVEN RECKEWERTH

European Community Energy Law—Selected Topics. Edited by DAVID S. MAC DOUGALL and THOMAS W. WÄLDE. [London/Dordrecht/Boston: Graham & Trotman/Martinus Nijhoff. 1994. xviii + 318 pp. ISBN 1–85333–962–8. £65]

THIS interesting book had its genesis in a collection of papers originally presented in summer 1992 under the auspices of Dundee University's Centre for Petroleum and Mineral Law and Policy. As a result its contents are somewhat eclectic; but the quality of the individual contributions makes it easy to view this as a virtue (each contributor writing on a topic in relation to which he or she has an established expertise). Although the papers had been presented two years earlier, efforts were made to bring the work up to date for publication in 1994.

As a precursor to the detailed contributions (which deal, in broad terms, with specific areas and issues arising where EC law and energy issues overlap), one of the editors (David Mac Dougall) discusses in an introduction whether a body of law which may be dignified by the title "European Community energy law" may fairly be said to exist, as distinct from the laws regulating energy matters within individual member States. He concludes (not surprisingly, perhaps, given the title of the book—but only after a thoughtful and careful analysis) that it does. The main body of the work, which follows, is divided into five sections: (1) European Energy Policy; (2) European Energy Legislation; (3) Environmental Law; (4) Oil and Gas; (5) Energy Financing. The chapters within each section, which cover a wide range of contemporary issues (for example, chapter 8: "The Impact of EC Law on Employment Offshore"; chapter 10: "The Court of Justice and Environmental Protection"), are well researched and authoritative. An extremely welcome feature is the index, which is reasonably detailed and therefore allows the book to be used not only as a narrative text but also for reference.

The fact that the contributors include a former commissioner of the European Communities with responsibility for energy (Antonio Cardoso e Cunha) and a judge of the European Court of Justice (David Edward) is perhaps an indication of the quality of this work. It undoubtedly represents an extremely valuable, and interesting, contribution to the literature on this hitherto neglected subject.

ALISON PADFIELD

The Legal Status of British Dependent Territories—The West Indies and North Atlantic Region. By ELIZABETH W. DAVIES. [Cambridge: Cambridge University Press. 1995. xxx + 376 pp. ISBN 0–521–48188–0. £60/$89·95]

ELIZABETH Davies, whose book *The Legal System of the Cayman Islands* was reviewed in (1990) 39 I.C.L.Q. 251, has spread her canvas. She has now subjected to careful scrutiny all six of the territories in the West Indies and North Atlantic Region remaining dependent on Britain. These are Anguilla, Bermuda, the British Virgin Islands, the Cayman Islands, Montserrat, and the Turks and Caicos Islands, occupying altogether 443 square miles of land, and with a total population of 135,000. They are not vast in themselves; but the comprehensive and detailed study the author gives to them presents the reader with a microscopic view characteristic of Empire development over nearly 400 years. The appointment by Charles I of a "Proprietor of the Caribee Islands" was the start, passing to representative government,