Dutch collective redress dangerous? A call for a more nuanced approach

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The Netherlands has become dangerously involved in the treatment of mass claims, Lisa Rickard from the US Chamber of Commerce recently said to the Dutch financial daily (*Het Financieele Dagblad*, 28 September 2017) and the Dutch BNR newsradio (broadcast of 28 September 2017). This statement follows the conclusions of two reports published in March and September 2017 by the US Institute for Legal Reforms (ILR), an entity affiliated with the US Chamber of Commerce. Within a few hours, the news spread like wildfire in online Dutch newspapers, see for instance here.

Worryingly enough, the March 2017 report, which assessed collective redress mechanisms in ten Member States, predicted that 'there are a number of very powerful indicators that all of the same incentives and forces that have led to mass abuse in other jurisdictions are also gathering force in the EU'. Among the jurisdictions surveyed, the Netherlands appeared as a place particularly prone to such abuse. The September 2017 report focuses on consumer attitudes towards collective redress safeguards, and ultimately concludes that 85% of respondents tend to support the introduction of safeguards for the resolution of mass claims.

The publication of the aforementioned reports is timely as the European Commission's evaluation report on the 2013 Recommendation on Collective Redress is expected this autumn, following the recent call for evidence. Some of the statements in these reports call for a more nuanced view. Indeed, the Dutch approach to the resolution of mass claims might have its drawbacks. It is certainly not exempt from criticisms. However, in a matter of such expedient nature, it is of the utmost importance that *both* sides are thoroughly addressed and assessed.

For the information of readers that are not familiar with the Dutch system: the Netherlands currently has two mechanisms that have been designed for collective redress specifically. The first one is the collective action for *injunctive* or

declaratory relief. A verdict in such action can provide the basis for an amicable settlement or for individual proceedings to seek monetary compensation. The second mechanism is the much-discussed WCAM settlement (based on the Dutch Collective Settlements Act, see also a previous post linking to papers and a report on the WCAM procedure). In addition, there is a proposal to introduce a collective action for *damages* (see a previous post on this blog).

Bad apples and the bigger picture

In the past years, few incidents have occurred in Dutch collective redress that may indeed come close to 'American situations' that are generally feared in Europe. Unfortunately, some commentators have chosen to mainly highlight such incidents. Notably, the ILR report of March 2017 refers to the notorious case of *Stichting Loterijverlies*, in which a foundation initiated a collective action on behalf of aggrieved lottery ticket holders against the Dutch State Lottery. The report rightfully mentions that the foundation's director has been accused of funnelling elsewhere, for personal gain, part of the consumers' financial contribution to the foundation. However, the report neglects to mention that the foundation had also been litigating for quite some years and that, ultimately, the Supreme Court ruled in its favour: the Dutch State Lottery had misled consumers for years. Furthermore, the report fails to mention that some of the foundation's participants successfully filed a request to replace the foundation's board. Moreover, despite (or on account of) the complexity of establishing causation and damages, the case has now been amicably settled. As part of the settlement, participants of the foundation have been reimbursed their financial contribution thereto, and all class members were free to participate in the settlement: an extraordinary, one-off lottery draw. Reportedly, 2.5 million individuals have done so.

Obviously, incidents such as the aforementioned case are of no avail to civil justice, and justify concerns about claim vehicles' activities and motives. However, we should also consider the many positive effects of collective redress mechanisms. Generally, Dutch collective actions and WCAM settlements provide for much-needed effective and efficient dispute resolution in mass harm situations.

Safeguards work: learning from experience

The March report by the ILR warns against the gradual decline of safeguards in the Netherlands, and in the EU more generally. Yet, various safeguards already exist, continue to do so, and generally function well in practice. For instance, the admissibility rules regarding representative organizations (that bring collective actions or are involved in a WCAM settlement) have become more stringent and are applied increasingly strict by courts. As to the current Dutch collective actions, there is proof that its numbers have slowly risen since 1994, but no proof exists that this is necessarily attributable to entrepreneurial parties, let alone that they have increased the number of frivolous claims (Tillema 2017). The proposed collective action for damages further raises the current threshold for representative organizations to obtain standing. The requirements concern the organizations' governance, financial means, representativeness, experience and expertise, and individuals' participation in the decision-making process. Indeed, a judgment will have binding effect upon all aggrieved parties who have not opted out, but all actions will be publicly registered, there is a strict scope rule, and individuals can raise objections.

So far, eight WCAM settlement have been declared binding. Undeniably, various parties have entered this market, including US counsels and their sizeable fees. However, in spite of its difficult task, the Amsterdam Court of Appeal seems growingly comfortable in assessing the reasonableness of a collective settlement, including the representative organizations' remuneration. In Converium, the reasonableness of (contingency) fees was assessed for the first time. In the currently pending eighth WCAM case, the *Fortis*-settlement, the court has demonstrated its awareness of the risks and of its task to also scrutinize the motives of representative organizations. In its interlocutory judgment, it has ruled that the settlement, in its current state, cannot be declared binding. It is deemed not reasonable due to, inter alia, the sizeable remuneration of the representative organizations and their lack of transparency thereon.

A Dutch 'manoeuvre' to become a 'go-to-point' for mass claim or an attempt to enhance access to justice for all?

'The Netherlands and the UK seem to be manoeuvring themselves to become the go-to jurisdictions for collective claims outside the EU', the March report highlighted. Obviously, this not the first time that other countries express their concerns against the extra-territorial effects of the Dutch legislation, an issue that has been discussed for several years in the context of the WCAM (Van Lith, 2011).

The ILR report indeed highlighted that in the Converium case, the Amsterdam Court of Appeal declared the settlement binding where a majority of shareholders were domiciled outside the Netherlands. Yet, the key question here is whether, for reasons linked to equality and efficiency, individuals who have suffered from losses resulting from a same misbehaviour should not be treated in a same manner and in the same proceeding, regardless of their actual location. By asserting global jurisdiction, the Amsterdam Court of Appeal ultimately ensured access to justice and equal treatment for all parties placed in similar situations, and ultimately avoided costly fragmentation of the case for parties and courts. In this regard, it should also be highlighted that the WCAM is a settlement-only mechanism, and – to the benefit of victims of wrongdoings – it is the wrongdoing party and the representatives of the aggrieved parties that jointly choose to address the Amsterdam Court of Appeal considering that the Netherlands has a suitable procedure to declare such settlement binding.

It is evident that collective redress mechanisms have both benefits and drawbacks. More than ever, the challenging, yet indispensable key word here is *balance*. As Commissioner Jourova recently observed at the release of the ILR September report, 'the discussion in EU countries is in full swing on how to strike the right balance between access to justice and prevention of abuse'. We hope this short post can contribute to the discussion.

European Procedural Law Study – Publication

The Max Planck Institute Luxembourg (MPI), heading an international consortium, including researchers from the Universities of Florence, Ghent, Heidelberg, Madrid (Complutense), Oxford, Paris (Sorbonne), Rotterdam, Uppsala, Vienna and Warsaw, has undertaken a European Commission-funded Study (JUST/2014/RCON/PR/CIVI/0082) on the laws of national civil procedure of the 28 Member States and the enforcement of European Union law.

The Study has two strands: the first deals with the impact of national civil procedure on mutual trust and the free circulation of judgements within the 28 Member States of the EU and the second deals with the impact of national civil procedure on the enforcement of consumer rights derived from EU law.

On September 28, the first strand of the Max Planck Luxembourg procedural law study has been published by the European Commission on the EU Law and Publications portal.

More information are available here.

Standard of Proof – International Conference – Humboldt Kolleg – Prague, October 26 – 27, 2017

The object of the conference is to inquire into the key question of assessment of proof, namely standard of proof. In general, evaluation of evidence requires an intellectual process, in which the evaluator reconstructs the past based on available information. Since the past cannot be repeated, the evaluator may only attempt to get as close as possible to the reality. Generally, as to the standard of proof we may identify two extreme approaches. First, which we can describe as hypothetical or speculative, stems from the persuasion of the judge. It employs such terms as “truth”, “certainty” or “beyond reasonable doubts”, etc. The result of it is “everything or nothing”. The second approach is, on the first sight, more scientific, since it measures the extent of credibility of the reconstruction by a degree of probability. If, for example, the degree of probability exceeds 51 %, such information is considered as proven. The main purpose of the conference is therefore to learn about different approaches in relevant European jurisdictions. The second purpose of the conference is to assess these different approaches and find an adequate standard. Finally, the conference shall increase the understanding of the matter by the interested public and the participants.

The detailed program of the conference can be found here.

Protecting Rights of Families and Children – meeting KNVIR The Hague

The Royal Netherlands Society of International Law (www.knvir.org) is delighted to announce its Annual General Meeting on PROTECTING THE RIGHTS OF FAMILIES AND CHILDREN IN A CHANGING WORLD. Three reports on this theme will be presented and discussed on this occasion. The meeting will be held in The Hague on **3 November 2017** and participation is free of charge.

Should you be in or near The Hague on that date, feel free to join this interesting gathering. The reports will be available for sale at Asser Press shortly after the event.

Investment Disputes – Multilateral Court on the Way

On September 13, the Commission adopted a Recommendation for a Council Decison authorising the opening of negotiations for a Convention establishing a multilateral court for the settlement of investment disputes.

The multilateral investment court initiative is conceived as a reaction to a number of problems that have been identified as stemming from ISDS (Investor-State Dispute Settlement), including the lack of or limited legitimacy, consistency and transparency of ISDS as well as the absence of a possibility of review. In the

words of the Commission, the initiative aims at "setting up a framework for the resolution of international investment disputes that is permanent, independent and legitimate; predictable in delivering consistent case-law; allowing for an appeal of decisions; cost-effective; transparent and efficient proceedings and allowing for third party interventions (including for example interested environmental or labour organisations). The independence of the Court should be guaranteed through stringent requirements on ethics and impartiality, non-renewable appointments, full time employment of adjudicators and independent mechanisms for appointment".

The text can be found here.

First and Second Issues of 2017's Rivista di diritto internazionale privato e processuale

(I am grateful to Prof. Francesca Villata – University of Milan – for the following presentation of the latest issues of the RDIPP)

The first and second issues of 2017 of the Rivista di diritto internazionale privato e processuale (RDIPP, published by CEDAM) were just released.

- The first issue features three articles, one comment, and two reports.
    - *Franco Mosconi*, Professor Emeritus at the University of Pavia, and *Cristina Campiglio*, Professor at the University of Pavia, **'Richiami interni alla legge di diritto internazionale privato e regolamenti comunitari: il caso dei divorzi esteri'** ('Effects of EU Regulations on Domestic Private International Law Provisions: The Case of Foreign Divorces'; in Italian).

This paper inquires whether Article 65 (Recognition of foreign rulings) and the

underlying private international law reference are still applicable to foreign divorces after Regulations No 2201/2003 and No 1259/2010 replaced Article 31 of Law No 218/1995 and after the recent provision submitting the dissolution of same-sex partnerships to Regulation No 1259/2010.

- *Peter Kindler*, Professor at the University of Munich, **'La legge applicabile ai patti successori nel regolamento (UE) n. 650/2012'** ('The Law Applicable to Agreements as to Successions According to Regulation (EU) No 650/2012'; in Italian).

Under Italian substantive law agreements as to succession are not admitted. The same is true, inter alia, for French and Spanish law. The idea behind this rule is deeply rooted in the dignity of the de cuius. The freedom to dispose of property upon death is protected until the last breath and any speculation on the death of the disponent should be avoided. Other jurisdictions such as German or Austrian law allow agreements as to succession in order to facilitate estate planning in complex family situations. This is why the Succession Regulation (650/2012/EU) could not ignore agreements as to succession. Article 25 of the Regulation deals with the law applicable to their admissibility, their substantive validity and their binding effects between the parties. The Regulation facilitates estate planning by introducing the freedom of the parties to such an agreement to choose the applicable law (Article 25(3)). The Author favours a wider concept of freedom of choice including (1) the law of the State whose nationality the person whose estate is involved possesses at the time of making the choice or at the time of death and (2) the law of the habitual residence of that person at the time of making the choice or at the time of death. As to the revocability of the choice of the lex successionis made in an agreement as to succession, the German legislator has enacted a national norm which allows the parties to an agreement as to succession to establish the irrevocability of the choice of law. This is, according to the Author, covered by Recital No 40 of the Succession Regulation. The Regulation has adopted a wide notion of agreements as to succession, including, inter alia, mutual wills and the Italian patto di famiglia. The Author welcomes that, by consequence, the advantages of Article 25, such as the application of the hypothetical lex successionis and the freedom of choice, are widely applicable.

The Regulation did not (and could not) introduce the agreement as to succession at a substantive law level. It does not interfere with the legislative competence of

the Member States. According to the author this is why member states such as Italy are free to consider their restrictive rules on agreements as to succession as part of their public policy within the meaning of Articles 35 e 40 litt. a of the Regulation.

- *Cristina Campiglio*, Professor at the University of Pavia, **'La disciplina delle unioni civili transnazionali e dei matrimoni esteri tra persone dello stesso sesso'** ('The Regulation of Cross-Border Registered Partnerships and Foreign Same-Sex Marriages'; in Italian).

With Law No 76/2016 two new types of pair bonds were regulated: civil unions between same-sex persons and cohabitation. As for transnational civil unions, the Law merely introduced two provisions delegating to the Government the amendment of Law No 218/1995 on Private International Law. The change is laid down in Legislative Decree 19 January 2017 No 7 which, however, has not solved all the problems. The discipline of civil unions established abroad is partial, being limited to unions between Italian citizens who reside in Italy. Some doubt remains moreover in regulating the access of foreigners to civil union in Italy as well as in identifying the law applicable to the constitution of the union, its effects and its dissolution; finally, totally unresolved – due to the limitations of the delegation – remains the question of the effect in Italy of civil unions established abroad between persons of opposite sex. With regard to same-sex marriages celebrated abroad the fate of Italian couples is eventually clarified but that of mixed couples remains uncertain; in addition, no information is provided as to the effects of marriages between foreigners.

In addition to the foregoing, the following comment is featured:

- *Domenico Damascelli*, Associate Professor at the University of Salento, **'Brevi note sull'efficacia probatoria del certificato successorio europeo riguardante la successione di un soggetto coniugato o legato da unione non matrimoniale'** ('Brief Remarks on the Evidentiary Effects of the European Certificate of Succession in the Succession of a Spouse or a Partner in a Relationship Deemed to Have Comparable Effects to Marriage'; in Italian).

This article refutes the doctrinal view according to which the European Certificate of Succession (ECS) would not produce its effects with regard to the

elements referred to therein that relate to questions excluded from the material scope of Regulation EU No 650/2012, such as questions relating to matrimonial property regimes and property regimes of relationships deemed by the law applicable to such relationships to have comparable effects to marriage. This view is rejected not only on the basis of its paradoxical practical results (namely to substantially depriving the ECS of any usefulness), but mainly because it ends up reserving the ECS a pejorative treatment compared to that afforded to the analogous certificates issued in accordance with the substantive law of the Member States (the effects of which, vice versa, have to be recognized without exceptions under Chapter IV of the Regulation). The rebuttal is strengthened considering the provisions contained in Chapter VI of the Regulation, from which it emerges that, apart from exceptional cases (related, for example, to the falsity or the manifest inaccuracy of the ECS), individuals to whom is presented cannot dispute the effects of ECS.

Finally, the first issue of 2017 of the *Rivista di diritto internazionale privato e processuale* features the following reports:

- *Katharina Raffelsieper*, Attorney at Thewes & Reuter Avocats à la Cour, '**Report on Recent German Case-Law Relating to Private International Law in Civil and Commercial Matters'** (in English).
- *Stefanie Spancken*, Associate at Freshfields Bruckhaus Deringer LLP, Düsseldorf, **'Report on Recent German Case-Law Relating to Private International Law in Family Law Matters'** (in English).

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The second issue of 2017 of the *Rivista di diritto internazionale privato e processuale* features three articles and one report.

- *Costanza Honorati*, Professor at the University of Milan-Bicocca, **'La proposta di revisione del regolamento Bruxelles II-*bis*: più tutela per i minori e più efficacia nell'esecuzione delle decisioni'** ('The Proposal for a Recast of the Brussels IIa Regulation: More Protection for Children and More Effectiveness in the Enforcement of Decisions'; in Italian).

The present essay is a first assessment of the Proposal for a recast of the Brussels IIa Regulation (COM(2016)211). After a short explanation of the reasons for not

touching on the highly controversial grounds for divorce, the essay develops on the proposed amendments in the field of parental responsibility and international abduction of children. It further analyses the amendments proposed to the general criterion of the child's habitual residence and to prorogation of jurisdiction (par. 3) and the new provision on the hearing of the child (par. 4). Major attention is given to the new chapter on abduction of children, that is assessed into depth, also in regard of the confirmation of the much-discussed overriding mechanism (par. 5-7). Finally, the amendment aiming to the abolition of exequatur, counterbalanced by a new set of grounds for opposition, is assessed against the cornerstone of free circulation of decision's principle. Indeed, new Article 40 will allow to refuse enforcement when the court of the state of enforcement considers this to be prejudicial to the best interest of the child, thus overriding basic EU principles (par. 8-9).

- *Lidia Sandrini*, Researcher at the University of Milan, **'Nuove prospettive per una più efficace cooperazione giudiziaria in materia civile: il regolamento (UE) n. 655/2014'** ('New Perspectives for a More Effective Judicial Cooperation in Civil Matters: Regulation (EU) No 655/2014'; in Italian).

Regulation (EU) No 655/2014 – applicable from 18 January 2017 – established a European Account Preservation Order procedure (EAPO) to facilitate cross-border debt recovery in civil and commercial matters. In order to give a first assessment of the new instrument, the present contribution aims at identifying the peculiarity that could make the EAPO preferable to the creditor vis-à-vis equivalent measures under national law. It then scrutinizes the enactment of this new piece of European civil procedure law in light of the principles governing the exercise of the EU competence in the judicial cooperation in civil and commercial matters as well as its compliance with the standard of protection of the creditor's and debtor's rights resulting from both the EU Charter of Fundamental Rights and the ECHR. Finally, it analyses the rules on jurisdiction as well as on the applicable law, provided for by the Regulation, in order to identify hermeneutical solutions to some critical issues raised by the text and clarify its relationship with other EU instruments.

- *Fabrizio Vismara*, Associate Professor at the University of Insubria, **'Legge applicabile in mancanza di scelta e clausola di eccezione nel regolamento (UE) n. 2016/1103 in materia di regimi**

patrimoniali tra i coniugi' ('Applicable Law in the Absence of a Choice and Exception Clause Pursuant?to Regulation (EU) No 2016/1103 in Matters of Matrimonial Property Regimes'; in Italian).

This article analyzes the rules on the applicable law in the absence of an express choice pursuant to EU Regulation No 2016/1103 in matters of matrimonial property regimes. In his article, the Author first examines the connecting factors set forth under Article 26 of the Regulation, with particular regard to the spouses' first common habitual residence or common nationality at the time of the conclusion of the marriage and the closest connection criteria, then he proceeds to identify the connecting factors that may come into play in order to establish such connection. The Author then focuses on the exception clause under Article 26(3) of the Regulation by highlighting the specific features of such clause as opposed to other exception clauses as applied in other sectors of private international law and by examining its functioning aspects. In his conclusions, the Author underlines some critical aspects of such exception clause as well as some limits to its application.

Finally, the second issue of 2017 of the *Rivista di diritto internazionale privato e processuale* features the following report:

- *Federica Favuzza*, Research fellow at the University of Milan, **'La risoluzione n. 2347 (2017) del Consiglio di Sicurezza e la protezione dei beni culturali nei conflitti armati e dall'azione di gruppi terroristici'** ('Resolution No 2347 (2017) of the Security Council on the Destruction, Smuggling of Cultural Heritage by Terrorist Groups'; in Italian).

Indexes and archives of RDIPP since its establishment (1965) are available on the website of the Rivista di diritto internazionale privato e processuale.

Le Brexit, Enjeux régionaux, nationaux et internationaux (2017) by Charles Bahurel, Elsa Bernard and Marion Ho-Dac (ed.)

The book *Le Brexit, Enjeux régionaux, nationaux et internationaux* (Bruylant, 2017), edited by Pr. Charles Bahurel, Pr. Elsa Bernard and Associate Pr. Marion Ho-Dac, has just been published. It includes a foreword, an introduction and papers from a three-days symposium on legal aspects of Brexit which took place in February and March 2017 in different universities.

The book is divided in three parts. The first is dedicated to the policy and institutional issues of Brexit and deals with Brexit preparation and post-Brexit relationships. The second part concerns EU citizenship and economic issues and deals with internal market and judicial cooperation in civil and commercial matters (see, *inter alia*, the contribution of Gilles Cuniberti on international economic aspects with a discussion paper by Emmanuel Guinchard and the contribution of Jean Sagot-Duvauroux on international family law aspects). It also focuses on some major actors of Brexit: EU citizens, students, patients, bankers and lawyers. The third part is devoted to criminal and immigration issues.

The abstract reads as follows:

Moins d'un an après le referendum britannique sur le retrait du Royaume-Uni de l'Union européenne, de nombreuses questions d'ordre économique, politique, juridique et social se posent quant à cet événement sans précédent dans l'histoire de la construction européenne.

Compte tenu des conséquences régionales, nationales et internationales du Brexit, il était nécessaire que des spécialistes viennent éclairer les multiples zones d'ombre qui subsistent sur des sujets aussi divers que l'engagement du retrait, les modèles de coopération possibles entre le Royaume-Uni et l'Union européenne, l'avenir politique, juridique et économique de cette Union, les enjeux migratoires du Brexit mais aussi ses enjeux pour les citoyens européens et pour les opérateurs économiques que sont, par exemple, les banques ou les entreprises.

Cet ouvrage s'adresse aux praticiens spécialisés en droit européen (avocats,

notaires, fiscalistes, banquiers) ainsi qu'aux universitaires et aux membres des collectivités territoriales.

Foreword of the editors: here

Tables of contents: here

Postdoctoral Position at the University of Milan

The University of Milan will recruit a postdoctoral researcher in Private International Law, starting in January 2018, for a duration of 24 months (renewable once).

The researcher will work on the project 'Private International Law and New Technologies'.

Eligible candidates must hold a doctorate in law or have comparable research experience. They must have a good/excellent command of Italian. Good command of English is an additional asset. Additional accommodation funding for candidates relocating from abroad is available.

Deadline for applications: 16 October 2017.

More details can be found here

Arbitrability of Company Law Disputes in Central and Eastern Europe: International Conference in Cluj-Napoca (Romania)

The Central and Eastern European Company Law Research Network is organising an international conference on the Arbitrability of Company Law Disputes in Central and Eastern Europe that will take place at the Department of Law of the Sapientia University in Cluj-Napoca (Romania). The event will be on 20 October 2017. Speakers include distinguished academics from various Central and Eastern European countries. The conference is open to the public. For the programme, registration and further details, please click here.

2018 ILA Biennial Conference, Sydney, Australia: Developing International Law in Challenging Times – Call for Papers

The International Law Association has launched the following Call for Papers:

„In 2018, the Australian Branch of the International Law Association will be hosting the biennial ILA conference. The conference, which is being held in Sydney, Australia, from 19-24 August 2018, is a major international event that will bring together hundreds of judges, academics, practitioners and officials of governments and international organisations from all around the globe. The

Australian Branch of the ILA is calling for paper and panel proposals as part of the program for the conference.

The objectives of the International Law Association include 'the study, clarification and development of international law, both public and private, and the furtherance of international understanding and respect for international law'. Yet how are we to anticipate the development of international law, and particularly understanding and respect for international law, in an ever-changing world? There are a myriad of international challenges facing global society—sharpening economic divides, nationalist assertions of boundaries, climate change, cycles of war and poverty, new uses of technology. The 2018 ILA conference will address diverse cutting-edge issues in international law as part of its ongoing study of international law, as well as through dialogue on pressing questions of public and private international law.

The ILA biennial conferences provide an opportunity for members of the ILA Committees to meet and advance their work on discrete areas of international law. The current work of the ILA Committees may be found here. Open sessions will be held on these topics to provide all attendees with the opportunity to learn of the Committees' work and to contribute to the development of the program of work.

In addition, a program will run for all attendees on the core theme of the conference: Developing International Law in Challenging Times. To this end, proposals are sought either for individual paper presentations or for panel presentations on specific themes. Higher degree research (PhD) students are also encouraged to submit poster presentation proposals. A networking and social program is also being organised to run during the conference for international and inter-state visitors.

For paper and poster proposals, speakers are to submit a title and 150-200 word abstract, along with a 150 word biography for potential inclusion in the program. A one-page CV should also be submitted. For panel proposals, the title of the panel and the titles of each paper are to be submitted with a 200 word abstract of the discussions of the panel and a statement on the proposed format for the panel. A biography and one-page CV should also be sent for each proposed speaker on the panel.

Submissions are to be emailed to **info@ila2018.org.au** by **1 November 2017**.

We look forward to welcoming you to Sydney in 2018!"