

The risk allocation in international sale of goods under English Law and the CISG 1980

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Abstract:

The transfer of risk is seen as a significant element in international trade transactions as it may have a considerable impact on the result of these agreements. To determine the moment when the risk passes from the seller to the purchaser and who should be responsible for the loss or damage of the goods, there are several international legal regimes such as the United Nations Convention on Contracts for the International Sale of Goods 1980 (CISG) and the national legal system like English Law, especially the Sale of Goods Act 1979 (SGA) containing the rules on the passing of risk concerning trade transactions. This paper will provide not only a general review of the rules on transfer of risk but also a comparison among these rules under these different law systems.

Keywords: *English Law, the Sale of Goods Act 1979 (SGA), the United Nations Convention on Contracts for the International Sale of Goods 1980 (CISG), Risk Allocation, International Sale of Goods.*