

Kacper Zajac

The Concept of Legal Personality under International Law

Essay

YOUR KNOWLEDGE HAS VALUE



- We will publish your bachelor's and master's thesis, essays and papers
- Your own eBook and book - sold worldwide in all relevant shops
- Earn money with each sale

Upload your text at www.GRIN.com
and publish for free



Bibliographic information published by the German National Library:

The German National Library lists this publication in the National Bibliography; detailed bibliographic data are available on the Internet at <http://dnb.dnb.de> .

This book is copyright material and must not be copied, reproduced, transferred, distributed, leased, licensed or publicly performed or used in any way except as specifically permitted in writing by the publishers, as allowed under the terms and conditions under which it was purchased or as strictly permitted by applicable copyright law. Any unauthorized distribution or use of this text may be a direct infringement of the author s and publisher s rights and those responsible may be liable in law accordingly.

Imprint:

Copyright © 2013 GRIN Verlag
ISBN: 9783668411296

This book at GRIN:

<https://www.grin.com/document/354924>

Kacper Zajac

The Concept of Legal Personality under International Law

GRIN - Your knowledge has value

Since its foundation in 1998, GRIN has specialized in publishing academic texts by students, college teachers and other academics as e-book and printed book. The website www.grin.com is an ideal platform for presenting term papers, final papers, scientific essays, dissertations and specialist books.

Visit us on the internet:

<http://www.grin.com/>

<http://www.facebook.com/grincom>

http://www.twitter.com/grin_com

*“Public international law is that system of law which is primarily concerned with the relations between states.”*¹ The system is composed of subjects enjoying legal personality to a greater or lesser extent. *“A subject of international law can be defined as an entity capable of possessing international rights and duties and having capacity to protect its rights by bringing international claims”*² though some authors question *“whether the doctrine of subjects serves a useful purpose any longer”*.³ Traditionally, it was a state that was a sole subject of international law. However *“it is accepted today that the subject extends to rights and duties pertaining to international organisations⁴, companies⁵ and individuals^{6”}*.⁷

It is widely accepted that recognised and independent states enjoy unlimited legal personality. There are four requirements for statehood: a permanent population⁸; a territory⁹; government¹⁰; and capacity to enter into relations with the other states.¹¹ The recognition of a state is an important factor that would indicate an existence of legal personality but is not conclusive¹². It seems that most of the state-like entities could be classified as subjects of international law, however it is rather unlikely for a widely unrecognised state to be described as such. In case of an extinction of a state¹³, a new one coming into existence on its place would either continue its predecessor personality¹⁴ or acquire a new one¹⁵.

¹ O'Brien J. International Law (Cavendish Publishing Limited, London 2001) at 1

² Kaczorowska A. Public International Law (Routledge, Abingdon 2010) at 176

³ Parlett K. 'The individual and structural change in the international legal system' (2012) Cambridge Journal of International and Comparative Law, Volume 1/Issue 3 at pp. 60-80

⁴ Repatriations for injuries suffered in the service of the United Nations (1949) ICJ 174; 16 ILR 318

⁵ E.g. Texaco Overseas Petroleum Company v The Libyan Arab Republic 53 ILR [1977] 389

⁶ E.g. Prosecutor v Furundzija 38 ILM 317 [1999] Case No IT-95-17/1-T

⁷ O'Brien J. International Law (Cavendish Publishing Limited, London 2001) at 1

⁸ E.g. 'nomadic tribes without any settled territorial links will not be sufficient' (Western Sahara (Advisory Opinion) [1975] ICJ 3 found in O'Brien J. International Law (Cavendish Publishing Limited, London 2001) at 140)

⁹ A territory does not have to be precisely defined, it also might be a subject of dispute between states: e.g. Israel (found O'Brien J. International Law (Cavendish Publishing Limited, London 2001) at 140)

¹⁰ However, Somalia lacked the Government in the 90s, yet it did not cede to be a state perhaps due to the presumption of a continuity of a state which implied that there would be a Somali Government at some point in the future (Evans M. International Law (Oxford University Press, Oxford 2006) at 239)

¹¹ Montevideo Convention on the Rights and Duties of States, Article 1(1), 1933

¹² Taiwan, describing itself as Republic of China, which satisfies all criteria for statehood and maintains relations with other states as well as is a party to various international agreements could be described as enjoying partial legal personality although not recognised as a separate state. (Kaczorowska A. Public International Law (Routledge, Abingdon 2010) at 201)

¹³ An extinction of a state might never be a consequence of a use of illegal force but rather a result of merger and incorporation or dissolution. (Shaw M. International Law (Cambridge University Press, Cambridge 2003) at 186)

¹⁴ E.g. Russian Federation possesses the legal personality of the former Soviet Union (e.g. the chair in the UN Security Council)

In case of federate states, the central government is normally responsible for conducting international relations but in some federations a component state is allowed to enter into relations with foreign states.¹⁶ Diminutive states, such as Monaco, despite their very small populations, “*have been recognised as possessing full international personality*”.¹⁷ What is more, *Sui Generis* entity of The Holy See enjoys the observer status in the United Nations including all the rights of full membership except voting and putting forward candidates¹⁸, it also concludes bilateral agreements with other states such as concordats¹⁹. Similarly, the Italian judiciary²⁰ has recognised the Sovereign Military Hospitaller Order of Malta as a sovereign entity.²¹ On the other hand, territories under condominium, such as Gulf of Fonseca,²² are not subjects of international law.²³

‘The State of Palestine’ is denied a status of a state as it is not in control of any piece of land.²⁴ However, liberation movements, such as the Palestine Liberation Organisation, enjoy certain degree of legal personality,²⁵ which has been acknowledged by the Court²⁶ as well as the UN²⁷ which has been granted the PLO status of an observer.²⁸ It seems that the principle of self-determination legitimises not only such movements but also some insurgent groups.²⁹

¹⁵ For instance, after the break-up of the Socialist Federal Republic of Yugoslavia in the early 90s, Serbia and Montenegro was obliged to apply for seat in the United Nation General Assembly even though it named itself the Federal Republic of Yugoslavia. (Security Council Resolution 777 1992 cited in Dixon M. & McCorquodale R. *Cases and Material on International Law* (Blackstone Press Limited, London 2000) at 140)

¹⁶ This could be illustrated by the fact that Ukrainian SSR and Byelorussian SSR were founding members of the United Nations in 1945 along with the USSR although at the time both constituted integral parts of the Soviet Union. This required some limited degree of legal personality. (Kaczorowska A. *Public International Law* (Routledge, Abingdon 2010) at 192)

¹⁷ Kaczorowska A. *Public International Law* (Routledge, Abingdon 2010) at 179

¹⁸ General Assembly Resolution 58/314 2004

¹⁹ E.g. Concordat between the Holy See and Portugal 2004

²⁰ *Scarfo v Sovereign Order of Malta* [1957] 24 ILR 1 Tribunal of Rome

²¹ Dixon M. & McCorquodale R. *Cases and Material on International Law* (Blackstone Press Limited, London 2000) at 159

²² *Case Concerning Land, Island, and Maritime Frontier Dispute (El Salvador/Honduras, Nicaragua Intervening)* [1992] ICJ

²³ *op. cit.* n 17

²⁴ O'Brien J. *International Law* (Cavendish Publishing Limited, London 2001) at 140

²⁵ Additional Protocol I 1977 to the Geneva Convention relative to the Protection of Civilian Persons in Time of War 1949

²⁶ *Arafat and Salah* RDI, 69 [1986] Italian Corte di Cassazione

²⁷ General Assembly Resolution 3237 (XXIX) 1974

²⁸ Cassese A. *International Law* (Oxford University Press, Oxford 2001) at 76

²⁹ Limited legal personality may be acquired by some insurgent groups which have been granted recognition of belligerency by the state they are fighting against which results in the conflict being governed by

The number of International Governmental Organisations has grown rapidly since the World War Two. These bodies are created by states and endowed with certain autonomy in order to realise common goals.³⁰ It has been ruled by the International Court of Justice that an IGO could possess legal personality³¹. According to the objective approach,³² legal personality can be inferred where certain requirements satisfied.³³ Once legal personality of an IGO has been established, it enjoys certain rights and privileges³⁴ as well as, as in the case of International Tin Council,³⁵ might be held liable for the non-fulfilment of its obligation.³⁶ Although, international organisation are created on the basis of treaties,³⁷ it is an accepted approach that the personality of such organisation is “*objective and opposable to non-members*”.³⁸

*“The key factor distinguishing international intergovernmental organisations, such as the UN ... from international non-governmental organisations, such as Amnesty International ... is that the former are composed predominantly of states (and other intergovernmental organisations) whilst the latter are composed of private entities though they operate in more than one country.”*³⁹ Various NGOs have contributed to the creation of international law, especially in the fields of human rights and environmental protection.⁴⁰ Following the resolution of 1968,⁴¹ the UN Economic and Social Council is allowed to confer a consultative status upon

the laws of war such as the Hague Conventions of 1899 and 1907 (International Cassese A. International Law (Oxford University Press, Oxford 2001) at 67)

³⁰ Advisory Opinion on Legality of the Use of a State of Nuclear Weapons in Armed Conflict ICJ Reports [1996] cited in Cassese A. International Law (Oxford University Press, Oxford 2001) at 70

³¹ *op. cit.* n 4

³² Whereas the inductive approach stipulates that legal personality might be implied from powers vested in the organisation but it will possess personality only if the founding stated wished so. (Evans M. International Law (Oxford University Press, Oxford 2006) at 282)

³³ It must be permanent association of states designed to attain certain objectives, possessing administrative organs and exercising power that is distinctive from power of its member states, whereas its competence must be exercisable on an international level and not confined to national systems of its member states only (Kaczorowska A. Public International Law (Routledge, Abingdon 2010) at 204)

³⁴ It has right to conclude international agreements with non-member states, right to immunity from jurisdiction of state courts, right to protection for its agents and servants in third states when acting in their official capacity as well as right to bring international claims. (Cassese A. International Law (Oxford University Press, Oxford 2001) at 74)

³⁵ Re International Tin Council [1988] 3 All ER 257 (CA)

³⁶ Evans M. International Law (Oxford University Press, Oxford 2006) at 283

³⁷ Treaties bind only parties to them (Vienna Convention on the Law of the Treaties 1969, Article 34)

³⁸ Evans M. International Law (Oxford University Press, Oxford 2006) at 284

³⁹ Evans M. International Law (Oxford University Press, Oxford 2006) at 279

⁴⁰ The Council of Europe recognises ‘that international non-governmental organisations carry out work of value to the international community’ therefore established ‘rules laying down the conditions for recognition of the legal personality of these organisations in order to facilitate their activities at European level’. (European Convention on the Recognition of the Legal Personality of International Non-Governmental Organisations, CETS No.: 124, preamble)

⁴¹ Economic and Social Council Resolution 1296 (XLIV) 1968

such NGOs.⁴² The International Committee of the Red Cross is probably the most prestigious NGO. In the case of *Prosecutor v Simic*⁴³ the ICRC was recognised by the International Criminal Tribunal for the former Yugoslavia as possessing international personality similar to the one enjoyed by the United Nations⁴⁴. Its importance has also been acknowledged in the Geneva Conventions 1949⁴⁵ whereby states are obliged to cooperate with ICRC during a potential conflict.⁴⁶ What is more, under some treaties⁴⁷, NGOs are empowered to provide information to international bodies where a state refuses to do so.⁴⁸ On the other hand, it seems that within the international legal order, acting as lobbyists and pressure groups remain their main role. Some authors argue that even though some organisations could even bring proceedings against a state before national courts,⁴⁹ apart from the ICRC, no other NGO “*is recognised as a subject of international law*”.⁵⁰ This might be the case primarily because NGOs’ actions are under the control of states as main actors in the international law.⁵¹

Multinational Corporations are those “*with wholly or partially controlled subsidiaries in more than one country*”.⁵² Such corporations “*have capacity to bring claims against a state before inter alia ... European Court of Human Rights*”.⁵³ On the other hand, in terms of human rights and environment protection, MCs are accountable only before national Courts.⁵⁴ Nevertheless, the case of *Barcelona Traction*⁵⁵ “*indicates that in certain circumstances an international tribunal will be required to recognise the well established municipal rule that a company has a legal personality distinct from that of its own members*”⁵⁶. The question of legal personality of corporations under international law seems to be very controversial and so far not sufficiently explored.⁵⁷

⁴² Kaczorowska A. *Public International Law* (Routledge, Abingdon 2010) at 215

⁴³ *The Prosecutor v. Blagoje Simic, Milan Simic, Miroslav Tadic, Stevan Todorovic and Simo Zaric* [1999] Case No. IT-95-9-PT

⁴⁴ *op. cit.* n 42

⁴⁵ Convention relative to the Treatment of Prisoners of War, Article 81

⁴⁶ Evans M. *International Law* (Oxford University Press, Oxford 2006) at 324

⁴⁷ E.g. Convention on the Right of the Child, Article 45

⁴⁸ Evans M. *International Law* (Oxford University Press, Oxford 2006) at 325

⁴⁹ *Greenpeace Inc (USA) v The State of France*, 946 F.Supp. 773 [1996]

⁵⁰ Kaczorowska A. *Public International Law* (Routledge, Abingdon 2010) at 216

⁵¹ Evans M. *International Law* (Oxford University Press, Oxford 2006) at 326

⁵² *op. cit.* n 50

⁵³ Kaczorowska A. *Public International Law* (Routledge, Abingdon 2010) at 217

⁵⁴ *Ibid.*

⁵⁵ *Barcelona Traction Light and Power Co (Second Phase)* [1970] ICJ 3

⁵⁶ O’Brien J. *International Law* (Cavendish Publishing Limited, London 2001) at 156

⁵⁷ The issue becomes even more complex when it comes to multinational public enterprises which are bodies established on the basis of ‘an international agreement providing for cooperation between gov-

“International law creates rights and duties for individuals capable of being enforced before international courts, tribunals and other bodies”.⁵⁸ This was recognised by the Permanent Court of International Justice in the Case Concerning Competences of the Courts of Danzig (Advisory Opinion) where the Court ruled that there might be *“adoption by the Parties of some definite rules creating individual rights and obligations...”*⁵⁹ Furthermore, the ICJ held⁶⁰ that Vienna Convention on Consular Relations⁶¹ confers rights on individuals and thereby confirmed that rights could be derived from treaties other than human rights oriented.⁶² What is more, under the European Union law, as held by the European Court of Justice⁶³, some provisions of the EU treaties have so called ‘direct effect’ and as a consequence might be invoked by an individual. However, individuals’ ability to bring a claim under international law is controlled by a state, therefore, they are only partial subjects.⁶⁴ Accordingly, their legal personality is limited to the cases where the state in question is a party to the treaty serving as a legal basis for proceedings.⁶⁵

International human rights law remains the widest area of individual’s legal personality. Individuals are allowed to be direct parties to a proceeding where they have brought a claim against a state⁶⁶ in whose jurisdiction they are,⁶⁷ provided the state in question has ratified a relevant treaty and the individuals have exhausted all domestic remedies.⁶⁸ In terms of obligation conferred upon individuals under international law, there is established personal responsibility for war crimes⁶⁹, genocide⁷⁰, apartheid⁷¹ and others⁷² because *“crimes against*

ernmental and private enterprises.’ (D. Fligler, *Multinational Public corporations*, Washington DC, 1967; Brownlie, *Principles*, pp. 67-9 cited in Shaw M. *International Law* (Cambridge University Press, Cambridge 2003) at 223) Such companies might possess some very limited international personality provided they are ‘given a range of powers and [are] distanced sufficiently from municipal law.’ (Shaw M. *International Law* (Cambridge University Press, Cambridge 2003) at 224)

⁵⁸ Kaczorowska A. *Public International Law* (Routledge, Abingdon 2010) at 207

⁵⁹ Case Concerning Competences of the Courts of Danzig (Advisory Opinion) [1928] PCIJ Rep Ser B No 15

⁶⁰ Case of LaGrand (Germany v United States of America) [2001] ICJ Rep 466

⁶¹ Vienna Convention on Consular Relations 696 UNTS 261

⁶² Kaczorowska A. *Public International Law* (Routledge, Abingdon 2010) at 208

⁶³ Case 26/62 Van Gend en Loos v Nederlandse Administratie der Belastingen [1963] ECR 1

⁶⁴ *op. cit.* n 62

⁶⁵ Cassese A. *International Law* (Oxford University Press, Oxford 2001) at 83

⁶⁶ For instance, the ECHR and the ACHR grant *locus standi* to individuals before the European Court of Human Rights and Inter-American Commission on Human Rights respectively. (European Convention on Human Rights, Article 34 & American Convention on Human Rights, Article 44)

⁶⁷ Even if they happen to be nationals of another state (E.g. *Soering v United Kingdom* [1989] ECtHR Ser A No 161 11 EHRR 439 found in Evans M. *International Law* (Oxford University Press, Oxford 2006) at 317)

⁶⁸ Evans M. *International Law* (Oxford University Press, Oxford 2006) at 317

⁶⁹ International Military Tribunal had jurisdiction to try and punish the Second World War criminals for crimes against peace, humanity and war crimes (Charter of the International Military Tribunal - Annex to

*international law are committed by men, not by abstract entities...*⁷³ Accordingly, these crimes can be punished by the national courts⁷⁴ as they fall under the universal jurisdiction of the customary international law.⁷⁵ However, recently, the International Criminal Tribunal for the former Yugoslavia⁷⁶ and the International Criminal Tribunal for Rwanda⁷⁷ have tried individuals under the Geneva Conventions.⁷⁸ The lack of permanent tribunal that could exercise jurisdiction over individuals committing crimes under international law forced national courts⁷⁹ to try international criminals⁸⁰. The establishment of the International Criminal Court that came into force in 2002⁸¹ could be regarded as a proper response to that problem.

It seems indisputable that the most obvious subjects of the international law are recognised and independent states fulfilling the Montevideo Convention criteria.⁸² It could be argued that the components of the federate states⁸³ as well as some small state-like entities⁸⁴ and liberation movements⁸⁵ also possess some limited personality. Similarly, it seems fairly straightforward that the International Governmental Organisations can enjoy legal personality.⁸⁶ As the Non-Governmental Organisations remain under control of the states, one may say that only the International Committee of the Red Cross enjoys legal personality to a greater extend⁸⁷ whereas the situation of the Multinational Corporations seems to be the

the Agreement for the prosecution and punishment of the major war criminals of the European Axis ("London Agreement"), 1945, Article 6

⁷⁰ Genocide Convention 1948

⁷¹ International Convention on Suppression and Punishment of the Crime of Apartheid 1973

⁷² For a comprehensive list see: the International Law Commission Draft Code of Crimes Against the Peace and Security of Mankind A/46/10 & 30 ILM, 1999 as revised by A/51/10 1996

⁷³ Judgment of the Nuremberg International Military Tribunal [1946] [1947] 41AJIL 172

⁷⁴ 'The Scope and Application of the Principle of Universal Jurisdiction. Report of the Secretary-General', UN Doc. A/66/93 2011

⁷⁵ O'Keefe R. 'Domestic courts as agents of development of the international law of jurisdiction' (2013) Leiden Journal of International Law, Volume 26/Issue 03 at pp 541-558

⁷⁶ Set up by the United Nation Security Council Resolution 827 1993

⁷⁷ Set up by the United Nation Security Council Resolution 955 1994

⁷⁸ E.g. Cases of Delalic, Mucic, Delic and Landzo 38 ILM 57 [1999]

⁷⁹ E.g. Attorney General of the Government of Israel v Eichmann 36 ILR [1961] 5 District Court of Jerusalem

⁸⁰ Dixon M. & McCorquodale R. Cases and Material on International Law (Blackstone Press Limited, London 2000) at 156

⁸¹ Set up by the Rome Statute of the International Criminal Court 1998, Article 1

⁸² *op. cit.* n 11

⁸³ *op. cit.* n 16

⁸⁴ *op. cit.* n 17 -21

⁸⁵ *op. cit.* n 25- 29

⁸⁶ *op. cit.* n 4

⁸⁷ *op. cit.* n 43 - 46

most convoluted one.⁸⁸ When it comes to individuals, it is undeniable that they are subjects of international law⁸⁹ as they have rights⁹⁰ and duties⁹¹ under international treaties, especially in the area of human rights. However, it must be remembered that it is the case only where a state is a part to the relevant treaty.⁹² Overall, the question of legal personality seems to be one of the most controversial ones as in the vast majority of cases it is virtually impossible to determine to what extent (if any) the entity can be considered a subject of international law.

⁸⁸ *op. cit.* n 53- 59

⁸⁹ *op. cit.* n 58 - 63

⁹⁰ *op. cit.* n 66 - 68

⁹¹ *op. cit.* n 69 -72

⁹² *op. cit.* n 64 - 65

Bibliography

Textbooks

1. Dixon M. & McCorquodale R. Cases and Material on International Law (Blackstone Press Limited, London 2000)
2. Cassese A. International Law (Oxford University Press, Oxford 2001)
3. O'Brien J. International Law (Cavendish Publishing Limited, London 2001)
4. Shaw M. International Law (Cambridge University Press, Cambridge 2003)
5. Evans M. International Law (Oxford University Press, Oxford 2006)
6. Kaczorowska A. Public International Law (Routledge, Abingdon 2010)

Cases

1. Case Concerning Competences of the Courts of Danzig (Advisory Opinion) [1928] PCIJ Rep Ser B No 15
2. Judgment of the Nuremberg International Military Tribunal [1946] [1947] 41AJIL 172
3. Repatriations for injuries suffered in the service of the United Nations [1949] ICJ 174
4. Scarfo v Sovereign Order of Malta [1957] 24 ILR 1 Tribunal of Rome
5. Attorney General of the Government of Israel v Eichmann 36 ILR [1961] 5 District Court of Jerusalem
6. Case 26/62 Van gend en Loos v Nederlandse Administratie der Belastingen [1963] ECR 1
7. Barcelona Traction Light and Power Co (Second Phase) [1970] ICJ 3
8. Western Sahara (Advisory Opinion) [1975] ICJ 3
9. Texaco Overseas Petroleum Company v The Libyan Arab Republic 53 ILR [1977] 389
10. Arafat and Salah RDI, 69 [1986] Italian Corte di Cassazione
11. Re International Tin Council [1988] 3 All ER 257 (CA)
12. Soering v United Kingdom [1989] ECtHR Ser A No 161 11 EHRR 439
13. Case Concerning Land, Island, and Maritime Frontier Dispute (El Salvador/Honduras, Nicaragua Intervening) [1992] ICJ
14. Advisory Opinion on Legality of the Use of a State of Nuclear Weapons in Armed

Conflict ICJ Reports [1996]

15. Greenpeace Inc (USA) v The State of France, 946 F.Supp. 773 [1996]
16. Prosecutor v. Blagoje Simic, Milan Simic, Miroslav Tadic, Stevan Todorovic and Simo Zaric [1999] Case No. IT-95-9-PT
17. Prosecutor v Furundzija 38 ILM 317 [1999] Case No IT-95-17/1-T
18. Cases of Delalic, Mucic, Delic and Landzo 38 ILM 57 [1999]
19. Case of LaGrandd (Germany v United States of America) [2001] ICJ Rep 466

Treaties

1. Hague Conventions of 1899 and 1907
2. Convention relative to the Treatment of Prisoners of War 1929
3. Charter of the International Military Tribunal (Annex to the Agreement for the prosecution and punishment of the major war criminals of the European Axis) 1945
4. Genocide Convention 1948
5. Geneva Convention relative to the Protection of Civilian Persons in Time of War 1949
6. Vienna Convention on Consular Relations 1963
7. Vienna Convention on the Law of the Treaties 1969
8. International Convention on Suppression and Punishment of the Crime of Apartheid 1973
9. European Convention on the Recognition of the Legal Personality of International Non-Governmental Organisations, No.: 124 CETS 1986
10. Convention on the Right of the Child 1989
11. Rome Statute of the International Criminal Court 1998
12. Concordat between the Holy See and Portugal 2004

Resolutions

1. Economic and Social Council Resolution 1296 (XLIV) 1968
2. General Assembly Resolution 3237 (XXIX) 1974
3. Security Council Resolution 777 1992
4. United Nation Security Council Resolution 827 1993
5. United Nation Security Council Resolution 955 1994

6. General Assembly Resolution 58/314 2004

Articles

1. Parlett K. 'The individual and structural change in the international legal system' (2012) Cambridge Journal of International and Comparative Law, Volume 1/Issue 3
2. O'Keefe R. 'Domestic courts as agents of development of the international law of jurisdiction' (2013) Leiden Journal of International Law, Volume 26/Issue 03

Other Documents

1. International Law Commission Draft Code of Crimes Against the Peace and Security of Mankind A/46/10 & 30 ILM 1999
2. 'The Scope and Application of the Principle of Universal Jurisdiction. Report of the Secretary-General', UN Doc. A/66/93 2011

YOUR KNOWLEDGE HAS VALUE



- We will publish your bachelor's and master's thesis, essays and papers
- Your own eBook and book - sold worldwide in all relevant shops
- Earn money with each sale

Upload your text at www.GRIN.com
and publish for free

