

Government wished it to mean, it is submitted that the 1956 constitutional regime shall not be given retroactive effect. It was given that effect by the Supreme Court in the above-reported cases *sub b* and *c*) as well as in other cases. Since the Convention on Road Traffic and its Protocol on Road Signs and Signals under international law entered into force for the Netherlands before the date on which the revision of the Constitution of 1956 became operative, this seems to be incorrect.

For more details on the relation between treaties and Netherlands law I refer to my annotation in this *Review* Vol. VIII (1961), pp. 385-387 and to my subsequent papers "Enige vragen betreffende de artikelen 65 en 66 van de Grondwet", *Nederlands Juristenblad* 1962, pp. 357-363, 385-391; "Poging tot ontwarring van de "self-executing" knoop", *Nederlands Juristenblad* 1963, pp. 845-853 and "De verhouding van de rechtspraak van het Hof der Europese Gemeenschappen tot die van de nationale rechters in de lid-Statens", shortly to be published in no. 49 of the *Mededelingen van de Nederlandse Vereniging voor Internationaal Recht*.

4. In the above-reported case *sub b*) no foreign element was involved. It merely dealt with an offence committed by a Netherlands autocyclist on a Netherlands road. The "non self-executing" Article 17 of the Convention and Article 1 of the Protocol could in this case be left aside, as the Supreme Court did.

In the above-reported case *sub c*) the Supreme Court deemed Articles 18 para. 1 and 23 para. 1 of the Convention, its Annex no. 7 and the implementing European Regional Agreement to be "self-executing". For the first time it enforced Article 66 of the Constitution with regard to these treaty provisions and Article 15 of the Netherlands Road Traffic Regulations. It must, however, be observed that these Regulations have not been laid down in an Act of Parliament, but in a Royal decree, that these Regulations entered into force on January 1, 1951, and the Convention and the Regional Agreement on October 19, respectively on December 4, 1952, that for this reason it was the relation anterior legislation—posterior treaty that obtained here, that the supremacy of the treaty has always been recognised by the Netherlands courts in this relation and that not Art. 66 of the 1956 Constitution but the pre-1953 constitutional regime should have been applied in this case.

L. ERADES

ERRATUM

The author of the article "On limitation of shipowners' liability", published in volume X, pp. 139-155 and 239-255, asked us to insert the following remarks:

- p. 139, 11th line from above: "ad referendum" to be omitted;
- p. 148, 4th line from below: "The convention was signed on October 10, 1957 by 18 countries, of which 4 ad referendum (Brazil, Israel, Portugal and Spain)". In footnote 31 "Portugal" has been omitted;
- p. 254, note 81, 15th line from above: the following words are to be inserted behind "Court of Cass.": 1927, N.J. 1927, 1259; C.A. The Hague, 1934, N.J. 1937, no. 108, aff. Court Rotterdam; Court of Cass."

Only after this article was written a copy of Panayotis Sotiropoulos "Die Beschränkung der Reederhaftung" (Berlin, 1962) became available to the author, who regrets to have been unable to mention this very extensive historical and comparative survey.