



A comparison between arbitration in United Arab Emirates and arbitration in England and Wales

by *Cyrus Raja*

This Article enumerates a comparison of some aspects of arbitration in the United Arab Emirates ('UAE') and Arbitration in England and Wales or Northern Ireland.

Legislative framework

- The legislative framework for arbitration in the UAE is stipulated in *Articles 203 - 218 of Federal Law No. (11) of 1992 – The Civil Procedure Law* – the UAE does not have a separate Arbitration Law.
- In England the Arbitration Act 1996 (which came into force on January 31st 1997) provides the legislative framework that applies to all arbitrations (where the seat of the arbitration is in England and Wales or Northern Ireland) commenced after January 31st 1997. This Act consolidates the principal Acts of 1950, 1975, and 1979 and codifies the more important principles of English Law.

Role of institutions

- An integral part of supporting party autonomy is the recognition of the role and importance of arbitral institutions/rules, which provide the procedural framework for the arbitration. Both in the UAE as well as England the parties may agree to the application of institutional rules by which a matter may be decided.

Agreement to Arbitrate

- In UAE - *Article 203(2) of the UAE Civil Procedure Law* stipulates that the arbitration