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'SUBREGIONAL GOVERNMENT':
NOT A LEVEL BUT A MULTIFUNCTIONAL OPTION
Paper
for Workshop on
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A. 'Subregion' as Working Title: Central Questions

Lacking constitutional and organizational clarity in using the terms of "subregions" and "subregional governments", there is a central need for defining the subject of debate. These notions can, therefore, only be conceived of as being working-titles. In order to arrive at sufficient clarity the following central questions must thus be addressed:

- Can a "subregion" determine one particular type of a territorially organized administration and/or a political sub-unit within administrative and/or constitutional structures and can it in this understanding stand for a specific level of government in its own right?

Or:

- Will it necessarily have to comprise a (possibly wide) range of organizational options, perhaps on more than one of the remaining levels of government?

8. 'Subregion' as a Level of Government of its own

1. If a "subregion" were to be a specific tier of government the presupposition would have to be ex definitione that it would have to be located in a regional/federal constitutional system. Within this it would then logically have to be equipped with a (limited) autonomy below the region. From this it would then as of necessity follow that it would have to be organized in a constitutional structure complying with the principles of representative government. This would in particular mean that this structure would have to be based on a directly elected assembly and an executive deriving its legitimacy from that organ.

Its status and structure would, therefore, be very much like that of the region itself, thus distinguishing the "subregion" from the region only by a geographically smaller size and by being organizationally located within the region. At the same time it would have to be of distinct quality in relation and comparison to local government.

The effect of such an understanding would then be that "subregions" would constitute a fourth tier of government besides national/federal, regional and (above) Total government.

2. The problems produced by such a construction would seem to be obvious:

- It would result in an over-complication of the constitutional as well as the political and administrative structure.

- This would lead to a loss of plausibility for the entire system of government.

- Moreover and even above this, such an understanding of the term would imply a self-contradiction within the regionalfederal system as a whole: If a union in the sense of a federation derives its legitimacy from the uniting pact of its constituent parts (foedus : pact being the root and basis of the federal idea) then these parts can only derive their legitimacy monopolously from their people directly. Otherwise the constitutional product would be a union of unions. It would thus either resemble a confederation or amount to the specific form of a double federation.

3. In order to distinguish more concretely what this would mean in structural terms, comparative parallels must be searched for in international experience. Only three such parallels would seem to be discernable:

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- With the Russian Socialist Federai Soviet Repubiic at Teast legally having been a federation in its own, the USSR was a double federation. It broke apart not only politically but also constitutionaliy. The presently remaining Commonweaith of Independent States is no state but (at its best) a Tose confederation.

- The Russian Federation of today with "Republics" and Autonomous Regions within them represents a highly compii-cated and hitherto extremely instable structure with a presently ongoing constitutionai process of which the re-suit is impossible to predict.1)

- The European Union (to be based on the Treaty of Maastricht) may be growing into a doubiy federalized institutionz) with a Union of its Member States among themselves and Member States being organized federally or regionaily in their internal structures, such as (from start) Germany, (recently) Beigium, (deveioping) Spain, (after future accession) Austria and, maybe, (emerging) others. However, such a European Union would be a completely different politicai body as compared with a nation-state. Even under the boldest federal guideiines it would at its best arrive at a "state of nationaIi-ties"3) comprising various national identities and having to be respected as such by the Union4). Mereover, it remains to be a creature of internationai iaw, oniy perhaps graduaiiy moving into one of constitutional law.5) All of these comparative paral19ls would thus either discourage imitation or not be applicable to a country like South Africa.

4. If such international comparison does not seem to be sufficientiy convincing, the foTflowing practical problems might be doing so:

- "Subregions" in the form discussed here would substantially detract political attention from the regions.

- Due to such a development, they would squeeze-in the political status and acceptance of the regions between that of the national/federal government and the further autonomous levels below the regions.

- They would thus virtually invite the eternal political game of "divide and rule" and by that soon lead the regional/federal system into deterioration.

- Further, a construction like this would create the claim of "subregions" to be themselves represented in the regional/federal chamber of legislation on the national level. The acceptance of such a claim would in due course make this chamber unworkable or at least impede its power-status substantially (as did e.g. the independent and so-called non-instructed right of voting of the Prussian provinces in the Reichsrat of the Weimar Republic in Germany)⁵).

5. As a result of all this it would seem to be obvious that an understanding of "subregions" in such a context would not be recommendable.

c. 'Subregions' as a Nation denouinating a Multiplicity of Organizational Forms on Different Levels of Government

If, therefore, "subregions" should not be a fourth tier of government, its forms must then necessarily be located within regional or local government or in both.

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Due to the differences in the organization of local government not only in Germany but, indeed, in most other Western countries on the one side and South Africa on the other, there seems to be another need for definition here: The fact that in most Western democracies⁷⁾ local administration is organized on different territorial steps within one and the same "staircase" of local autonomy does not mean that local government as such is by virtue of this device to be considered as establishing a fourth tier of government on its higher territorial step. Instead, it constitutes one level of government as a whole

- with differentiated functions of the smaller and the larger local community without by this differentiation creating distinct tiers of government as between these two

- as long as both of them belong and remain as such within the sphere of organizational autonomy and political responsibility of regional government being the second tier below the national/federal level.

D. From Abstract to Concrete: Characteristics of the German System

1. First of all, it needs to be emphasized that the states (Länder) in Germany are the constituent parts of the Federation and that they and within them the bodies and authorities of local government fulfil by far the most of all administrative functions, even within the field of applying and executing Federal law. They do, of course, have substantial legislative competences of their own and according to the basic philosophy of the constitutional system, the Länder are even the residual seat of the overall "exercise of governmental powers and for the discharge of governmental functions" including the legislative ones⁸⁾. Within this principle of the distribution of competence, however, the centre of gravity for the Länder has in practice clearly moved to the fulfilment of the

administrative tasks including, though, the substantially important ones of planning (in conjunction with the Local government Teve) while the Federation has moved more and more into the role of the legislating tier.⁹)

Despite this, local government is and has nonetheless always been an undisputed part of exclusive State (Länder) responsibility in all fields pertinent to it:

- Legislative competence on its constitutional, administrative and territorial organization is exclusively a matter of Länder law. The Federation has no right whatsoever to interfere in this area. The only exception to this rule is the Federal guarantee of self-government for Local authorities in Art. 28 of the Basic Law regarding "the right to regulate, on their own responsibility, all the affairs of the Local community within the limits set by statute"¹⁰). Local government bodies (of the lower and higher type) can thus appeal to the Federal Constitutional Court (as well as to the State Constitutional Courts) against infringements of that right by Federal or State law. This, however, does in no way diminish the States' exclusive competence of legislating on them.

- The same applies to the bases of their financial equipment: The power of levying Local revenue¹¹) is a matter of State Law, allowing for autonomous Local variations within it. Means for general and specific fiscal assignments to Local government bodies are set out in the States' budgets and accordingly administered by the States' ministries subject to Local Legal claims to receive such means. Even within the field of Federal law resulting in State fiscal obligations and/or obligations of the Local level, the Länder have in most cases a veto and thus shaping power by way of their influence on Federal legislation via the federal chamber, i.e. the Bundesrat.

In the field of administration, it is not the Federation but exclusively the Lander who exercise powers of supervision regarding the conduct of local authorities. Due to the States' obligation to respect local autonomy in its own right, this power of supervision is, however, a differentiated one:

- o In all fields of self-administration pertaining to the matters of the local community as such and not otherwise regulated by statutes (which in themselves must respect local autonomy under Art. 28 of the Basic Law) the States' right of supervision only relates to the legality of any specific matter in dispute, thus not extending to questions of feasibility '(Rechtsaufsicht).

- o States' powers of supervision extending to feasibility also (Fachaufsicht) thus only apply to matters in the field of executing either State or Federal law; Even within this field there is a differentiation between those matters in which local government administers statutory law within its own responsibility (here being subject to supervision only according to specific statutory regulation) and those fields, in which they act as agents of the State's Government (here being subject to unlimited State instruction).

In none of these areas of administrative functions does the Federation, however, have any direct say in local government matters. This means in practice that it has always to address the Land Government, even if it holds that Federal legislation is mal-administered in any part of the country.

Within its territorial and the ensuing functional organization, local government differentiates between three main types¹²):

- the local community as such in the form of the village or town/municipality (Gemeinde/Stadt) - varying in size between below 500 up to an average of 100,000 inhabitants and each of these (under different rules of state law) being part of

- the supra-local community in the form of the counties (Kreise) with an average size of 170,000 (varying between 50,000 and 650,000) inhabitants and besides fulfilling supra-local tasks of their own also exercising, in particular, functions of equalization between the wealthier and the less rich of the villages and towns/municipalities within their territory

- the urban community, which comprises both the local and the supra-local level, thus the municipality and the county in one in the form of the city (Stadtkreis, Kreisfreie Stadt), this type comprising all urbanizations from approximately 100,000 inhabitants (see above) onwards.

All of these organizational types of local autonomy are equipped with representative bodies of their own, i.e. in particular with elected assemblies (Gemeinde- and Stadtvertretungen, Kreistage, Stadträte - institutional names varying from Land to Land according to historical tradition) and with either one-man or collegiate heads of administration brought into office either by vote of the assemblies or - as in Bavaria, Baden-württemberg and growingly by way of current reform in other States, too - by direct vote of the people.

Distinct from this tier of local government (to be understood as 93g level comprising the described territorial differentiations) there are decentralized agencies of regional (Land) administration under the direct functional authority of the regional (Land) government.

This means that they are not constituted as territorially organized self-government units, but as administrative authorities within the hierarchical organization of regional government subject to this government's administrative instructions and politically organized within the responsibility of regional (Land) ministers to their respective regional (Land) parliaments.

The forms of such decentralized state administration vary according to the size of the States and to their respective legislation on the allocation of such decentralized functions:

- In the larger Länder (i.e. in most of them except such as Schleswig-Holstein and the Saarland, leaving aside the City States of Berlin, Hamburg and Bremen being special cases as Federal States in their own right) there are Government Districts (Regierungsbezirke, Bezirksregierungen), each comprising several counties and cities and varying largely in size (from 500,000 to 5.5 million inhabitants) according to state law and density of population (In the "Old" Länder there are altogether 26 such Districts with 4 in Baden-Württemberg, 7 in Bavaria, 3 in Hesse, 4 in Lower Saxony, 5 in North Rhine-Westphalia and 3 in Rhineland-Palatinate.)¹³⁾

- Below them in most states (including in particular the smaller ones, where there are no Government Districts) the counties simultaneously act as decentralized agents of state government besides being local government units as described above. They do so by either having specific

state departments in their county administration or by the device that the head of the county administration acts as a state representative and thus is a state civil servant in matters of regional administration besides at the same time being the executive head of the local government body.

Functionally, these institutions of local government and of decentralized regional government are, of course, interwoven in many fields and organizational ways. To describe all of them in any satisfactory detail would quite obviously go beyond the limits of this chapter. To illustrate the linkages and the interdependencies of the system, an example taken from the area of school administration must, therefore, be sufficient here:

- Regarding differentiation between the territorial types of self-government in local administration:

- 0 The building, equipment and maintenance of elementary educational institutions is in all cases a matter of the local community (municipality).

- o The same functions referring to institutions of vocational training and (mainly in rural areas) sometimes also to institutions of higher school education are in most cases a matter of the county.

- Regarding functional differentiation between local and regional government:

- 0 The setting-up of school-curricula and

- o the personnel management as well as the civil service status of teachers

are always a matter of state legislation and administration.

8. Summing up the basic philosophy of "subregional government" in Germany in the sense of allocating differentiated legislative and administrative powers to the levels of regional and local government, the following needs, therefore, to be emphasized:

- States (Länder) and local government bodies (comprising both territorial types) each have their own fields of - even constitutionally guaranteed - autonomy and responsibility. For local government, this applies in particular to the "sovereignty of planning" (Planungshoheit) which in daily practice and in its relevance to the citizen often counts for more than legislative competences (exercised in the form of by-laws by the local government bodies).

- Nonetheless, both levels partially share administrative institutions to fulfil their respective functions.

- But: In between them, there is nothing like an autonomous 'subregion' belonging to the sphere of neither of them.

E. Possible Options for South Africa

If it is legitimate and appropriate to derive consequences from this for the problems to be solved in South Africa, the main result would appear to be that "subregional arrangements" should not be uni-dimensional in the sense of creating a distinct (and thus fourth tier) of government, but that options should be considered to be manifold and multifunctional.

In applying this result to the hitherto apparently still rather vague and unclear debate on alternatives for subregions in South

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Africa, the following options might emerge from summarizing the previous deliberations¹⁴)

Guidelines to be suggested for consideration as a conceptual framework to be applied individually or cumulatively, depending on existing geographical, administrative, economic and other conditions could be as follows:

1. "Subregions" could form the basis for the creation of a structure of local government parallel to, and comprising that of, municipalities (comparable to the counties in Britain and the USA, the départements in France and the Kreise in Germany). This then would not entail a fourth level of government. If designed in a sufficient territorial dimension, these bodies could formulate and execute local government policies and functions for which the boundaries of the municipalities are too narrow, but which should nonetheless be kept in, or brought into, the scope of local autonomy. Such institutions would have directly elected representative bodies of their own (such as also the British County Councils) which would, however, not be conceived of as suborgans of the regional, but as institutions of the local level itself. Democratic legitimation and administrative responsibility would thus coincide on that level without unduly interfering with regional functions. Such institutions could provide more effective co-ordination on the basis of representative government, provided there is clarity on the division of powers and duplication is avoided.
2. Where the administrative units are too large, the administrative capacities of "subregions" could be utilized to serve as decentralized and territorially concentrating agencies of the regional government (such as the Regierungsbezirke in the larger German States). Having their representative basis in the constitutional structures of the regions themselves, they would consequently not require directly elected bodies of their own, provided that local government bodies have an elected base. This approach could lead to a deconcentration of

administrative powers from the regional capitals. But care should be taken (by regional and/or national constitutional law) that regional governments cannot usurp the functions of the local government level (in either of its territorial differentiation between the municipal and the county type).

3. The reason why such subregional administrative agencies of regional government should not be equipped with representative ('parliamentary') institutions of their own, is a fundamental one which substantially touches upon the status of both regional and local democratic organization as such. To the same extent it also has its effects on the administrative efficiency of the entire system. German scientific debate about this reason has concentrated best in the following statement: "The Government Districts do not have to be 'political', because the other levels are so also; but on the contrary it contributes positively to the difficult function of mediation and linkage between the formulation of regional and local policy aims, if this functional level is not in itself politically organized. The system as a whole would not gain anything, let alone in uniformity and stability, if also the intermediate level were to be 'parliamentarized', but much rather it would deteriorate into relations of (damaging) competition."15)

4. The only advisable and systematically admissible form in which subregional administrative agencies of regional government could include elected institutional organs would be one based

- on advisory functions in limited fields and
- on indirect election by local government bodies.

Even such institutions should, however, not have a status by virtue of which they could counteract to, or compete with, the political responsibility of the power-delegating regional government toward the regional parliament. (In Germany, institu-

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tions of this kind and limitation are known only in the field of subregional planning, and even in this area they only exist or existed in some States, such as Hesse, Rhine-land-Palatinate and North Rhine-Westphalia.)¹⁵)

In the case of the smaller administrative units, the "subregions" could have a double function: Besides being an institution of the elected local government level within the sphere of local autonomy as described above (see no. 1), their respective administrative branches could at the same time be decentralized agencies of regional government (as the Kreise are in Germany within the Regierungsbezirke and particularly within the smaller German States, where there are no Government Districts). This model could be particularly applicable for integrating presently segregated municipalities into one system of representative local government, without immediately surrendering the functions fulfilled by the present institutions.

Where administrative units coincide with metropolitan municipalities, they could perform the functions of the lower and the higher territorial form of local government (as do the Stadtkreise/Kreisfreie Städte in Germany) and possibly also be decentralized agencies of regional government for their area. Local authorities in their present state or in their amalgamated form could be considered. Such an option is also referred to as the "twin-city concept". This option could in the interim period be based on administrative cooperation and eventually on fully representative local government.

In conjunction with any of the options identified above, specialist institutional bodies (such as the metropolitan chambers or Regional Services Councils at present) could complement "subregional arrangements" by providing specialist services, e.g. planning, intergovernmental relations, administration or joint service delivery. Such institutional bodies

should be mandated and appointed by representative local governments and not by regional or national governments. Their activities would be functional and cooperative and they should not be seen as new territorial government bodies. Parallels in Germany would in particular be the "Purpose Corporations" (Zweckverbände) and planning institutions for urbanized areas, such as e.g. the Raumverband surrounding and comprising the City of Hanover.¹⁷⁾

In the application of any of these options, international experience should be borne in mind to the effect that "subregions" should not distort the constitutional aim of establishing a politically plausible and administratively workable regional system. This should in particular result in the following:

On the level of national institutions, "subregions" should not be represented as such in a regional second chamber alongside the regions themselves.

On the level of regional structures, "subregions" should not be constituted as a second regional and thus fourth tier of government alongside the national, regional and local governments.

t Within the regional framework, "subregions" should not have a status that would enable them to distract political attention from the regions and thus manoeuvre the regions into a squeezed-in position between national and 'subregional' politics.

The problem of demarcating 'subregions' in the organizational context as advocated here, the criteria for their demarcation and, alongside with them, their powers and functions need to be further investigated. As an overall rule for such demarcation it can, however, be stated, that its criteria would, in relation to their functions, *mutatis mutandis* be rather closely comparable to those for the demarcation of regions.¹⁸⁾ International experience rele-

vant for this could be drawn 9.9. from the deliberations preceding State legislation on local government territorial reform in Germany in the 1960s and 1970s (which presently also determine the equivalent measures being taken in the five new Länder who acceded to the Federal Republic under the Treaty of Unification with the former German Democratic Republic in 1990).

Notes

The paper reflects the personal view of the author. It should thus not be identified with the state.

of the German Democratic Republic or its Mission to the Federation in Bonn in which he works as head of Division.

1) Cf. O.9. Eine Engländer. Der Weg zur neuen Verfassung bleibt atainig, in: Gmral-Anzeiger

(Bonn). 13 July 1993

2) For more detail on this concept see: Eine Länder. Federation and Union- in German Foreign

Relations: Power-Sharing in Treaty-Making and European Affairs, in: German Politics, vol. 1 (1992). pp. 119 - 135 (133) - also in: Charlie Jaffary and Round Table- (eds.), (1993) Federal

or- allu, Unification and European Integration; London and Portland. USA: Frank Cass; pp. 119

- 135 (133) and in: Brian Hocking (ed.). (1993) Foreign Relations and Federal States; London and New York: Falcaator University Press; pp. 236 - 251 (248/9) (The author pleading for 'a Europe with rather than of the regions' in this context; cf. the pages quoted in brackets above).

3) H. Rainer Lepsius. Zwischen Nationalstaatlichkeit und nationaler Integration In: B. Kohler-Koch (ed.). (1992) Staat und Demokratie in Europa; Opladen: Leske und Mithras; pp. 190 - 192

2) The Treaty on European Union (Maastricht Treaty) 5-00.09 that duty explains verbally on the Union in its Art. F; for the English text of the Treaty see: "Our Majesty's stationary Office

(ed.). (1992) Treaty on European Union; London: HMSO

5) For the legal and political consequences of that fact in relation to the principle of majority see: Eine Länder. Costa and Benefits of Federalization: The Political Dimension In German Practice and European Perspectives; Contra for European Studies, Nuffield College. 01

(- ford: Discussion Paper No. 10 (1991) pp. 18 - 19

6) Under Art. 83 of the German Constitution (11 August 1919, 9681. p. 1383) on the half of the votes of Prussia were not instructed by the Prussian Government but by the provinces of the

state; for data and evaluations see: Gerhard Anschütz, (1925) Die Verfassung des Deutschen Reichs, 9th edn.; Berlin: Verlag Georg Olms; pp. 202 - 207

7) Of which only the United States, Great Britain. France and Germany had to be mentioned as examples.

8) Art. 30 of the Basic Law; authorized English translation: PM and Information Office of the

Federal Government (ed.). (1993) Basic Law for the Federal Republic of Germany; Bonn: IPA

9) Cf. Eine Länder, Working structures of Germany is. in Germany: Crossroads German and European

Unification; Contra for Federal Studies. University of Leicaator: Discussion Paper No. F3 92/1 (1992) pp. 5 - 7 and id.. The working Relationships Datum Bond and Lindor In Germany

in: Charlie Jaffary and Peter Savignier (eds.). (1991) German Federalism Today; Leicaator and

London: Leicaator University Press; pp. 40 - 82 (41/42)

10) As Art. 29 of the Basic Law is of central significance for the relation of the Federal constitutional structure to that of the Länder and of local government. It may be useful to

quote it here in its full text (for the translation see note a):

"(1) The constitutional order in the united- shall conform to the principles of the republican, democratic and social state under the rule of law (Rechtsstaat). within the meaning of

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(3) Th. Fodoration dull onsure that tho constitutionu order of tho Llndor conform to the basic right: and to the provisions of paragraph. (1) and (2) of this Articlof Including the pouor of tho countiu (Kniu). boing the units of local govern-ont of tho highor territorial typo. to levy n 'mty contribution' (Kniu-Iago) on tho mlcipalitin belonging to thou, which is to a Mrs. extent sowing purpooos of oqualizntion lions those local oo-unitics.

For oxtensivo detail on all aspects of those thru typos m: Wolfgang Hans, Gard Schmidt-Eichstaedt. Rudolf Schlfor 0t 11.; stun, Kniu und Guoind-n; Ilbliogrnphiochos Institut MannhoiI/Wion/Zurich und Mayors LoxikomVor-Ils

For their stttus. sizes and functions within the adlinistrativo systu m: Frido Mmr.

Di. Rosiormgabozerko in Gomtaufbau dor- Vorlaltuns, in: Vowaltmss-Archiv. vol. 73 (1982), pp. 153 ct uq.

Tho forlulation of those option. in Inning to, but partly extending on, tho 'Options for Subrogionr u at out In: Bortus do Villicrs, UH. Loonu-dy, Put du Toit Ind Christa do Corning; Duarcation - Options for tho East Rand (Working Document). Protoria (July 1993) pp.

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Trmslated from Ruinor Nahl. Di. Organisation ma Entwicklung dor Vonnltung in con LIndorn und in Berlin, In: Dautlcho Vonnltmssguchichto, vol. 5 (1987): Di. lundosrowbllk Deutsch-land. p. 231 - Sililtrly 1100: Pride Hlmr. op. cit. (m not. 13) p. 154. who mitlonnly uphuizos that such a 3mrliuontarizution' would probably also lnd to "a vmrlng DOV.-

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Cf. Frido Wagoner. op. cit. (m not. 13) p. 163.

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Joseph Nitti. Dio h6horon Gouindovorblndo in suddoutschlnd (pp. 432 - 451); Klaus Moyer-Schwickorath, Die hahoroh Gcmindovorblndo ln Norddoutschlund - also: id.. Solutvorvaltung in h6horon Kommlvorblndon in: Solbutvorvaltung iI Stut der Industriosoullschaft. Fost-gabo zun 70. Goburtsttg von Goorg Christoph von Unruh. Hoidolborg (1983) pp. 435 - 459 Of. Region: in South Africa, Report for Discussion with Political Parties. Pretoria (15 M arch

1993) pp. 14 - 23; also: the working Docuont quoted in not. 14 pp. 7 - 23 and: W. Lmrdy, Tho Maration of Regions: Comparativo Standards and 00mm Exporionoo. ln:

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