

**The Common European Sales Law (CESL) and the Vienna Sales Convention
(CISG)**

SAROLTA SZABÓ

This article examines the relationship between the United Nations Convention on Contracts for the International Sale of Goods (CISG) of 1980 and the Proposal for a Common European Sales Law (CESL) which was published on 11 October 2011 and attempts to compare both instruments. The introduction of a European instrument for cross-border commercial sales contracts would insert a new, regional instrument between the divergent national laws of the Member States and the international sales convention. It is questionable therefore, that the business world would prefer another legal instrument or not? That is why essentially important to analyze the major differences between the CISG and the CESL focus on the goals, the opt-in and opt-out approach, the scope of application and the style of regulation of both sets of rules.