I. INTRODUCTION

The Caribbean Single Market and Economy (CSME) is a work in progress. It represents the latest and perhaps the most major advance towards regional integration of Caribbean countries.¹

These countries, which for the greater part are former colonies of the United Kingdom, are small open economies. Their earlier efforts at regional integration floundered on the ragged rocks of a still existent insularity and perhaps a certain selfishness when two of the bigger members of the then ten member federation. Jamaica and Trinidad withdrew from the Federation.²

Jamaica's withdrawal was conditioned and mandated by a critical referendum on whether to remain in or opt out. Trinidad, whose brilliantly irascible but sharp-witted leader, Dr. Eric Williams³, declared as a mathematical certainty

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² For a general survey on the failure of the Federation, see HUGH W. SPRINGER, REFLECTIONS ON THE FAILURE OF THE WEST INDIAN FEDERATION (1962).

³ Dr. Williams earned his Ph.D. at Oxford University. ERIC WILLIAMS, INWARD HUNGER: THE EDUCATION OF A PRIME MINISTER (1969). His dissertation, Capitalism and Slavery, broke new ground...
that “one from ten leaves nought,” took Trinidad, thereafter, out of the Federation. Perhaps Dr. Williams understood better than most of us that any realistic chance of regional integration would succeed only if the push came from the region itself. Further it needed to be rooted in economic integration with the deeper political integration following sometime after the initial successes of the economic coming together.

The Federation collapsed in 1962 after four rocky years of anxiety filled existence. By July 1963, Dr. Williams convened the first Heads of Government conference in Trinidad & Tobago. The conference was attended by the leaders of Barbados, British Guyana, Jamaica, and Trinidad & Tobago, the so-called “Big Four,” former colonies of the United Kingdom.

Emerging from these yearly series of Heads of Governments conferences, a number of decisions were reached on the critical question of regional integration. On August 1, 1973, as fate would have it, the Caribbean Community and Common Market (CARICOM) was established by the Treaty of Chaguaramas in Trinidad. The treaty was signed by Barbados, Jamaica, Guyana, and Trinidad & Tobago. It is the Treaty of Chaguaramas (hereinafter “Treaty”), now amended and revised, which seeks to establish the Caribbean Community, including the CARICOM Single Market and Economy.

The Right Honorable Owen Arthur, Prime Minister of Barbados and the Head of Government, is charged with the lead responsibility of promoting the CSME. Recently, he said, the CSME is “an exercise which will entail our taking the fifteen participating economies stretching from Belize in the West to Suriname in the East which have hitherto existed as separate, distinct economies and reconstituting them as a single market and a single economy.”

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4. Treaty Establishing the Caribbean Community, July 4, 1973, 12 I.L.M. 1033 [hereinafter Chaguaramas Treaty]. The Treaty was so named after the American base located in the northern-part of the island. Dr Williams may have held it at the base as a symbolic gesture to his colleagues and the region that the Caribbean had to take charge of its destiny. Some years before, he had successfully negotiated the closure of the base with the United States. This action was replicated some years later by the Barbados Government in relation to a base maintained in the northern part of Barbados. Id.

5. Revised Chaguaramas Treaty, supra note 1.

He also cautioned that it will “unquestionably be the most complex, the most ambitious and the most difficult enterprise ever contemplated in our region ... substantially more difficult to attain than integration on the political plain.”

Mr. Arthur also reminded us that:

Our Caribbean Community has been conceived to be a community of sovereign states. Each sovereign state, in such an arrangement, retains exclusive powers in relation to the implementation of community decisions. There is also no provision for the transfer of sovereignty to any supra-national regional institutions and there is no body of community law that takes precedence over domestic legislation nor is automatically applied in domestic jurisdictions.

And he continues:

The Caribbean has therefore chosen the most difficult political form of integration by which to implement something that is as complex as a Single Market and Economy. A community thus conceived must, of course, depend for much of its formal structure on the legal provisions embodied in its Treaties and Agreements and the formal arrangements devised to support its systems of Governance.

II. ESTABLISHMENT OF CARIBBEAN COURT OF JUSTICE AS AN IMPORTANT COMPONENT OF THE CSME

One of the formal arrangements devised to support the system of Governance within the Caribbean Single Market and Economy, and which has received considerable attention in the regional press, on call-in programs and amongst lawyers is the provision for a Caribbean Court of Justice (CCJ).

Earlier mention was made of the fact that the Caribbean Community is an association or community of sovereign states. Such a state of affairs would normally lead to the situation in which each sovereign state could, through its courts, determine and interpret the extent and meaning of provisions of the Revised Treaty. The potential for uncertainty, conflicting decisions, and general
chaos concerning the legal platform upon which certain investment decisions by business leaders would have to be made, apart from anything else, mandated the creation of a body which would have the final and exclusive jurisdiction to determine the interpretation and applicability of the Revised Treaty. Hence, Article 211 provides that the court shall have:

[C]ompulsory and exclusive jurisdiction to hear and determine disputes concerning the interpretation and application of the Treaty, including:

a) Disputes between the member states parties to the agreement;
b) Disputes between the member states parties to the agreement and the community;
c) Referrals from national courts of the member states parties to the agreement;
d) Application by persons in accordance with Article 222 concerning the interpretation and application of this Treaty.\(^\text{12}\)

The conferment of compulsory and exclusive jurisdiction on the CCJ would therefore seem to definitively rule out any national court seeking to determine disputes which may arise within its jurisdiction. This will likely remove a potent source of potential conflict in the interpretation of matters relevant to the Revised Treaty.

Article 214 further underpins this denial of jurisdiction to the national courts. It provides that where a national court is seized of an issue whose resolution involves a question concerning the interpretation or application of the Revised Treaty, the court or tribunal concerned shall refer the question to the Court for determination before delivering judgment if the national court or national tribunal considers that a decision on the question is necessary to enable that national court to deliver its judgment.\(^\text{13}\) It would seem to follow that the national court would regard itself as bound to act on the decision of the CCJ in those circumstances.

The combined effect of Articles 211 and 214 not only solves the problem of conflicting and competing decisions on interpretations of the Treaty but it also enhances the ability of the Court to develop a coherent community law. As one learned commentator put it in relation to the importance of a court such as the CCJ:

\[A\] central judicial authority is vital to the progressive pursuit of the aims and objectives of the Treaty. Without such an organ, the community is faced with the competing competence of the courts of

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12. Revised Chaguaramas Treaty, supra note 1, art. 211.
13. Id. art. 214.
the individual member states in determining questions relating to interpretation and application of the Treaty. This is quite an untenable arrangement for the juridical viability of CARICOM. The establishment of a central judicial organ of the community, endowed with exclusive competence and authority to give rulings on matters of community law, far from eroding the individual sovereignties of member states, will be giving effect, severally and jointly, to these individual sovereignties. For such a central organ, acting on behalf and in the interest of the whole and the several parts of the community, is indispensable for the sustenance of life of CARICOM.14

Another learned observer takes the view that:

On careful analysis of the role envisaged by the West Indian Commission for the proposed CARICOM Supreme Court, it would not be difficult to conclude that the West Indian Commission perceived the Court in the exercise of its original jurisdiction as the institutional centerpiece of the proposed CARICOM Single Market and Economy.15

Such a description is not mere hyperbole, if hyperbole at all, because the observer then goes on to aptly demonstrate why the role of the CCJ is so critical. He writes:

The rights envisaged for community nationals in this expanded economic space include the right of establishment, the right to provide services and the right to move capital. But in order to facilitate the trans-border movement of these rights without unnecessary restrictions, there is need for an institution to authoritatively and definitively interpret and apply the revised Treaty of Chaguaramas establishing the Caribbean Community including the CARICOM Single Market and Economy, in the absence of which rights would tend to be illusory and the obligation correlative thereto, merely vacuous commitments on the part of the Governments concerned.

14. See Joseph Cuthbert, Caribbean Economic Integration: Reflections on Some Legal and Institutional Issues, in ESSAYS IN HONOUR OF WILLIAM G. DEMAS (Laurence Clarke & M.G. Zephrin eds., 1997). The author commented on the case of D.S. Maharaj Furniture & Appliances Ltd. v. Comptroller of Customs and Excise (S-1499/93) (Trin. & Tobago) regarding the applicability of the Community Law. His comments are pertinent on the indispensable need for an institution such as the CCJ in the context of the Community.

15. POLLARD, supra note 10, at 89-90.
And this is where the Caribbean Court of Justice, in the exercise of its original jurisdiction is expected to play a critical role.¹⁶

There is no doubt that it is now widely accepted that the CCJ, in its original jurisdiction, does have a vitally critical role to play in the development of Caribbean Community Law, especially in relation to the dispute settlement procedures. Perhaps for this reason, there has developed the need for the CCJ to be seen as free from political interference of any kind and for its independence as a Court to be effectively guaranteed by its non-reliance for necessary funding on any one or more of the regional Governments. For example, Article 5 of the Agreement to establish the CCJ provides for a Regional Judicial Legal Services Commission on which no politicians can have a seat, and which appoints the Judges of the Court except the President who, according to Article 4, Clause 6 shall be appointed or removed by the qualified majority vote of three quarters of the Contracting parties on the recommendation of the Regional Judicial Legal Services Commission.¹⁷

Similar insulating or insulatory provisions were applied to the question of funding for the Court. Consequently, an agreement was reached to establish a trust fund in the amount of US $100 million, which would be used to fund the capital and recurrent cost of the CCJ by the income produced from the investment of that sum.

Recently it was announced that the Caribbean Development Bank had successfully floated a US $150 million note on the international capital market of which the sum of approximately US ninety-six million will be used to finance the operations of the Caribbean Court of Justice.¹⁸ All that is required now, according to this press release, is for the "expeditious completion of loan preconditions by member Governments so that disbursement of the funds can be made to the Caribbean Court of Justice Trust Fund where the monies will be managed and invested by a specially appointed Board of Trustees."¹⁹

Given the history of the region, the nature of the Revised Treaty, and the importance of the CCJ to the Treaty, these arrangements that appear to be unique are necessary. The arrangements speak to the creative ingenuity of the people of the region. It also speaks to the good faith of the regional political directorate in making the effort to ensure that the CCJ as a critical component of the revised Treaty, is as free as possible, in its constituent judicial structures, from any interference whatsoever from politicians.

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¹⁶. Id. at 90.
¹⁹. Id.
In fact, one author was driven, in my opinion quite accurately, to indicate that:

[T]he Caribbean Court of Justice is the only regional judicial institution of its kind in the world whose judges will not be appointed, directly or indirectly, by the political directorate of the states participating in the regime... financially, too, the CCJ is likely to be the only regional judicial institution in the world which will be financially independent of the executive and, by compelling inference also administratively independent of the central executives of participating member states.20

Given all that has been done to insulate the CCJ from the vagaries of politics, it is somewhat ironic that at one stage a raging and virulent regional debate arose in which the accusation was made that the CCJ was conceptually nothing more than a hanging Court. The accusation also maintained that the CCJ was being devised in order to reverse some of the more interesting decisions of the Privy Council in which the Privy Council was said:

[T]o have emasculated the hallowed common law doctrine of precedent as it was generally understood in common law jurisdictions, and by allegedly turning on their heads numerous decisions of the judicial committee with the Privy Council of longstanding introduced unacceptable levels of instability and uncertainty in the administration of criminal justice in the sub-region.21

Sir David Simmons, the present Chief Justice of Barbados, and former Attorney General of Barbados, chaired the Proprietary Committee set up to implement the arrangements for the inauguration of the Caribbean Court of Justice. He met this criticism head on when he delivered an address to the Royal Commonwealth Society in London in 2003.22 Simmons stressed that the development of the CCJ was not the result of a knee jerk reaction to any particular decision of the British Privy Council, but that its establishment became necessary as a dispute settlement mechanism under the Caribbean Single Market and Economy.23 He was also reported to have said that the arguments for and against the Court were carefully examined and that he wanted

20. POLLARD, supra note 10, at 37-38.
21. Id. at xiii.
23. Id.
to dispel emphatically the notion that the Court was being established to accelerate hangings in the region.24 Significantly, it is reported that Lord Hope of Craighead, the Scottish Law Lord indicated at that very occasion that the English Law Lords were very supportive of the idea of a Caribbean Court of Justice and that he, as a Scottish Judge, appreciated the desire of the Caribbean to chart its own course in jurisprudence.25 On another occasion, Lord Slynn was moved to declare that, "[t]he arrangements for selecting judges and financing the Caribbean Court of Justice offers useful precedents for the establishment of regional judicial bodies."26

It would not be unreasonable to say that in the conceptualization and establishment of the Caribbean Court of Justice, the people of the region have demonstrated their intellectual creativity, their ability to apply unique solutions to old problems and that if any further proof was needed of the ability of Caribbean people to find solutions for their own problems that the establishment of the uniquely structured CCJ is ample proof thereof.

III. FREEDOM OF MOVEMENT

Clearly the people of the region are important to the whole process of integration, for in many respects it is the people who drive the need for integration. Recognizing this important verity, the revised Treaty in Article 45 declares that, "[m]ember states commit themselves to the goal of free movement of their nationals within the community."27

In a recent speech delivered in Bridgetown, Barbados, Mr. Steven MacAndrew, Specialist, Movement of Skills and Labor, CARICOM Single Market and Economy declared that:

The core task in creating the CARICOM Single Market and Economy is the removal of restrictions to enable the free exercise of national treatment rights, particularly the free movement of goods, the free movement of services, the free movement of persons, the free movement of capital, and the right of establishment. Especially critical are the new areas which seek to transform the common market for goods into a genuine single market and economy namely free movement of services, persons, and capital and the right of establishment, since the free movement of goods have been largely achieved.28

24. Id.
25. Id.
27. Revised Chaguaramas Treaty, supra note 1, art. 45.
A study prepared for the Caribbean Policy Development Center by the Caribbean Development Research Services goes even further. It argues that our reliance on services requires a prioritization of the human element in regionalism and therefore freedom of movement is a primary rather than a secondary concern. These observations underscore the importance of the removal of existing restrictions on the free movement of services, capital, and persons and on the right of establishment. The observations reinforce Steven MacAndrew's view that the free movement of skills is one of the key pillars of the CSME and thus a critical element of the economic and trade agenda as well as the regional labor agenda.

The Revised Treaty of Chaguaramas recognizes the critical importance of the free movement of skills and this recognition is incorporated in Article 45 which states, "[m]ember states commit themselves to the goal of free movement of their nationals within the community."

So stated, Article 45 appears to give some kind of legal flesh to the bare bones of statements made in the 1989 Grand Anse Declaration in which the Heads of Government agreed to, among other things, the elimination by December 1990 of the requirement for passports for CARICOM nationals traveling to other countries and the elimination of the requirement for work permits for CARICOM nationals beginning with the visual and performing arts, sports, and the media traveling to CARICOM countries for specific regional events.

The idealism expressed in Article 45 is tempered by the realism of Article 46 which reads:

Without prejudice to the rights recognized and agreed to be accorded by member states in Articles 32, 33, 37, 38, and 40 ... [member states] undertake as a first step toward achieving the goals set out in Article 45, to accord to the following categories of community nationals the right to seek employment in their jurisdictions.

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30. MacAndrew, supra note 28.
31. Revised Chaguaramas Treaty, supra note 1, art. 45.
33. Revised Chaguaramas Treaty, supra note 1, art. 46.
The categories so privileged are:

1) University graduates;
2) Media workers;
3) Sports persons;
4) Artists;
5) Musicians.

They are further recognized as such by the competent authorities of the receiving member states.

This state of affairs has provoked comment from authoritative quarters. In the opinion of Steven MacAndrew, "[t]his provision clearly indicates that member states are aware that total free movement of labor is not yet achieved, but merely a work in progress, which most likely would go beyond December 31, 2005."34

The comments of Owen Arthur, Prime Minister of Barbados and the Minister with lead responsibility for the creation of the CSME, were more muscular. Speaking at the beginning of the Estimates Debate in the Barbados Parliament in March 2003, he spoke of his efforts at "[t]rying to underscore the ridiculousness of some aspects of the ways the Caribbean was approaching the Single Market issue . . . [and that] the region had started by saying that graduates, musicians, and sportsmen should move freely while ignoring the rest of the region’s human capital."35 According to him, this "has created a collision with the historic experience of the Caribbean people."36 He went on to point out "that those persons who do not have [u]niversity [d]egrees and other skills have been moving and have effectively made this region their economic space."37 He was also concerned that the CSME would not "resonate in the minds of the ordinary Caribbean man and woman as a benefit to them if there was only pro-

Examine, either from a policy or technocratic perspective, this issue is one that will not go away. However, it requires sensitive legal and political treatment if the region’s people, the intended beneficiaries of the removal of the restrictions, are not to regard regional integration issues as matters which do not concern them, thereby confirming the fears of the Barbadian Prime Minister.

In trying to develop the appropriate legal framework to remove the restrictions, while recognizing the different stages of development of the member

34. MacAndrew, supra note 28.
35. See BARBADOS DAILY NATION, MARCH 18, 2003, (last visited Nov. 6, 2004).
36. Id.
37. Id.
38. Id.
states and catering to the fears that the nationals of those states which are less well off, goods will flood into the common economic space of the more developed countries. The policy makers and technocrats will need the wisdom of a Solomon.

IV. REMOVAL OF BARRIER RESTRICTING FREEDOM OF MOVEMENT REQUIRED TO PROMOTE THE EFFECTIVENESS OF THE CSME

It is ironic that genuine freedom of movement appears to have existed in the Caribbean while it was under colonial rule. But the clamor for independence and the consequent creation of mini-states within the region means that boundaries which did not exist before independence but were created on independence, must now as a matter of economic necessity, be dismantled and torn down.

The legal mechanism for tearing down these barriers to free movement of the skilled community nationals is two fold. In the first place, an Act of the respective domestic Parliaments must be passed incorporating the provisions of Article 45.\textsuperscript{39} This legal formality must be accompanied by the appropriate administrative and procedural framework for the free movement of university graduates and persons of the other approved categories.

By May of this year, it appeared that:

[F]ree movement of graduates, artistes, musicians, media workers, and sports persons was fully operational in all member states except Montserrat, St. Kitts and Nevis, Antigua and Barbuda, and Barbados. At that time Barbados had the legal and administrative arrangements in place for the free movement of graduates once they had secured a job, all other categories still required a work permit if applicants worked for more than three months.\textsuperscript{40}

But the enactment of this legislation is not enough. There must also be the appropriate administrative and procedural framework for the free movement of university graduates and the other approved categories. While it appears that the free movement of such persons "is currently fully operational in all but four member states,"\textsuperscript{41} the question of regional integration and the matter of social security will become an increasingly important issue as the integration movement advances and it becomes necessary "to facilitate the movement of labor as a key factor of production."\textsuperscript{42}

\textsuperscript{39} Revised Chaguaramas Treaty, supra note 1, art. 45.
\textsuperscript{40} MacAndrew, supra note 28.
\textsuperscript{41} Id.
\textsuperscript{42} Id.
So far, the Heads of Government have signed the CARICOM Agreement on Social Security, an Agreement that protects the entitlement to benefits of CARICOM nationals and seeks to give them equality of treatment when they move from one member state to another.43 Speaking from a position of hands-on experience in these matters, Steven MacAndrew, a specialist with the CSME Unit is full of praise for the way in which the Agreement in Social Security has worked. He says:

The CARICOM Agreement on Social Security for some time now has been one of the best if not the best implemented CARICOM Single Market and Economy related measure, since all member states with an existing social security organization have fully operationalized the Agreement, resulting in the fact that in most member states CARICOM nationals are already enjoying benefits under the Agreement.44

The importance of proper and appropriate administrative arrangements is most significantly demonstrated by this statement because the success (so far) of the Agreement on social security has been reached not by the enactment of legislation, but by an administrative and procedural framework which appears to support the written agreement and has resulted in the fact that “[i]n most member states CARICOM nationals are already enjoying benefits under the Agreement.”45 Perhaps the CSME in this respect at least is beginning to “resonate in the minds of the ordinary Caribbean man and woman.”46

Nevertheless, it seems to me that the continuing problems experienced by some community nationals as they travel from island to island constitute perhaps a more significant psychological barrier to the acceptance of the CSME than some of us might think, notwithstanding the completion of the appropriate legal framework for the freedom of movement.

Hassle-free movement is not yet, it would appear, the experience of the Guyanese traveling to Barbados. In a debate in the Barbados Parliament recently on the Freedom of Movement Legislation, the Barbadian Prime Minister was moved to demand of his country’s Immigration Officials that the community nationals traveling from Guyana to Barbados should be treated in a more humane manner.47 Clearly the enactment of legislation and the

44. MacAndrew, supra note 28.
45. Id.
46. BARBADOS DAILY NATION, supra note 35.
imposition of the most beneficial administrative arrangements will mean nothing unless the people, whether they are Immigration Officers or ordinary citizens, without any specific powers accept that they are all members of a Caribbean nation.

During the debate on the Freedom of Movement Bill in the Barbados Parliament, a comment was made that is no less alarming, because it may well be true. Mr. Arthur himself declared that, "[t]here is no sense of Caribbean nationhood, there is no sense of Caribbean citizenship. People in the Caribbean are first and foremost Barbadians, Jamaicans, or Trinidadians but do not speak of themselves as West Indians."48

In my opinion, hassle-free movement can significantly breakdown this kind of insularity. Continuing insularity is a matter which needs to be addressed urgently if the legal framework for the development of the Caribbean community is to achieve its objectives. Especially with the current legislative framework suggesting that there is a "them" and an "us" and that the vast majority of Caribbean nationals who live the experience of integration should be excluded from the formal legislative and administrative arrangements to facilitate free movement of community nationals.

Integration at any level requires laws and regulations. But in the final analysis, it is about the people of the states which are seeking to integrate their markets and economy. Whether we like it or not—it is not only about politics, economics, and law. People are the center of that intersection.

One of the earliest advocates of the political federation would have understood the current problems only too well. Writing on the reasons for the break up of the federation, Sir Hugh Springer49 reminded us that:

Our common origins and associations have created and are in process of molding a people. This is shown in our way of life, our food and drink, our sport, our recreations, our arts. Our poets, novelists, playwrights, dancers, painters, and sculptors are recognizably West Indian... Our differences are real. But we are not dismayed by them. Our provincial loyalties are not to be despised; loyalty must begin somewhere. Difference and diversity can enrich and stimulate. Federation is a challenge to move into a new dimension of life and thought, and to achieve a fuller and freer life as members of a wider community. It may well be that the historian of the future will look back on the period of the next few years as being necessary to cure us of some of our sentimentality and some of our immaturity, so that when we next come together we shall do so with greater respect for


49. Sir Hugh Springer later held the position of Barbados's Governor General and also served as a part time Registrar of the University of the West Indies.
one another and a sounder understanding of what each and all of us will be able to contribute to the common good. If this should come about, as I hope and believe it will, the union we shall create will be a healthier and more propitious one.50

One hopes so, but at this stage our hopes must be qualified.

So far as the Caribbean Court of Justice is concerned, the initial steps have been sure and the prospect for its development and seminal role within the Community seems assured. On the other hand, so far as the Freedom of Movement is concerned, even some well wishers are more than ordinarily concerned that the community’s leaders may simply have got it wrong. This sentiment was recently echoed by Sir Roy Trotman,51 one of the region’s most distinguished labor leaders and legislator. As usual, his opinion was forthright. He said he had never agreed to special treatment for university graduates, or for the creation of an elitist community.52 He continued, stating:

I’m of the view that starting from the position of the particular group, we have less chance of integration for the Caribbean than if we start elsewhere. I believe that it is those people who are able to treat one another without the level of the formality of the training, those people are better able to address the level of barriers that there are to Caribbean integration than the sophisticated tertiary level people.53

Sir Trotman reminded the Senate that as far back as 1991, he had said that the movement should start with the artisans, and perhaps there is something to what he says. For if the Treaty represents the foundation of the community, then there is still a great deal of work to be done to construct a genuine Caribbean community on that foundation, for the Caribbean Single Market and Economy is definitely a work in progress.

V. CONCLUSION

There can be no doubt that much genuine effort and energy has been exerted by the Caribbean leaders in order to bring the CSME into effect. It is equally true that the CSME cannot succeed unless, as Prime Minister Owen

50. SPRINGER, supra note 2, at 62-63.
51. Sir Roy Trotman is General Secretary of Barbados Workers’ Union and a Governor General’s Appointee to the Senate of Barbados.
53. Id.
Arthur of Barbados says, "it resonates with the man and woman in the street." The plans and ideas conceptualized for the establishment of the Caribbean Court of Justice are worthy of the highest commendation; indeed they have already received it.

On the other hand, the practical difficulties notwithstanding, the provisions relating to the freedom of movement are not guaranteed to catch the approval of the man and woman in the street. At a basic level, these provisions appear to be tilted in favor of the graduates of the University of the West Indies and other professional of similar standing. This does not appear to be the best engineered foundation, and a great deal of remedial work may have to be done as the regional leaders continue to develop the framework of the CSME.

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54. BARBADOS DAILY NATION, supra note 35.