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NORTH-SOUTH SOCIO-ECONOMIC RELATIONS IN THE MEDITERRANEAN

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1. Perspective

One problem in covering north-south socio-economic relations in the Mediterranean is that the two units ("north" and "south") are not discrete or distinct entities. The use of terms based on a simple geographical division may lead observers to neglect some of the dimensions which impinge on relations between and among the states of the Mediterranean.

It is important to recognise, first, that the states on both sides of the Mediterranean are linked into political, cultural and economic groupings with other states in their areas - states which are themselves not adjacent to the Mediterranean and may have few direct interests in the Mediterranean. The economic policies pursued by most of the northern Mediterranean countries towards the states on the southern shore are, of course, shaped within the context of the European Community's policies, strategies and rules. The objectives and requirements of non-Mediterranean EC countries therefore impinge crucially on the north-south Mediterranean relationship.

On the southern shore of the Mediterranean, similarly, the role of non-Mediterranean Arab countries (especially the states of the Gulf Cooperation Council) is of importance to the policies pursued by the Mediterranean Arab countries - and indeed the latter policies can only be properly understood in terms of the wider context. Even non-Arab non-Mediterranean regional powers, in particular Iran, may have a significant influence on the character of the north-south Mediterranean relationship.

There are, moreover, aspects of the north-south Mediterranean relationship where differences among the countries on one side of the divide are critical. The resource bases, state of social development, and trade potential of the countries of north Africa vary considerably. Libya, for example, is a labour-importing country while all of the others export labour. It would be wrong to impose a spurious unity in analysing the position of these states. Turkey, moreover, fits uneasily in the north-south division. Geographically part of the north, it is the only clearly north Mediterranean state which is not a member of the European Community. Its relationship with the EC provides some comparison with the relationship of that of the southern Mediterranean countries, yet the stage of its economic

development, its culture, and the character of its economic resources place it in a very different position from that of the states of north Africa.

In this paper, the EC-Arab relationship will be taken as constituting the core of north-south relations across the Mediterranean. It should not be forgotten, however, that this approach involves a measure of distortion as well as of simplification. The other dimensions of north-south relations will, where possible, be fitted into the analysis.

2. The Security Challenge and Socio-Economic Relations

There are two central aspects of north-south Mediterranean socio-economic relations : the trade relationship and the labour/population relationship.

With regard to the trade relationship, the proportion of the EC's trade with non-EC Mediterranean countries constitutes about 10% of the EC's total trade. While this proportion may not be substantial enough to make the continuation of the trade essential to the EC, it is nonetheless sufficient to warrant continuing concern. Some of the trade, moreover, is in goods which are in some respect of strategic importance ; most significantly, oil, oil products and gas. It should also be noted that considerably more than 10% of the EC's trade passes through the Mediterranean - on its way to countries outside of the region.

As for the flow of labour, there are currently some 2.5 million North Africans employed in the labour markets of the EC, and perhaps another million workers from the other non-EC Mediterranean countries. There is every indication that, despite the attempt by some EC countries to stem the flow of migrants from the southern Mediterranean countries, the number will rise in the future. The availability of southern Mediterranean labour will certainly increase : the population balance around the shores of the Mediterranean is shifting steadily, with the rate of population growth on the southern side outstripping that on the northern side by some 2% per annum. The path of development of the EC labour market, moreover, suggests that there will be a growing need for unskilled labour - in the types of jobs which immigrant labour currently occupies, and which EC citizens are themselves loath to perform. The stake of the southern Mediterranean countries in the EC labour market, therefore, is substantial and constitutes a dimension of EC interest.

The trade and labour interests of the EC do not necessarily take on the form of security concerns. In the Mediterranean area, however, the EC does make such a translation. This stems from a perception that economic and political conditions in the southern

Mediterranean states are bad and are liable to threaten the EC's interests. The negative view of the southern Mediterranean states comes across in a recent EC document : annex 2/3 which accompanied the Commission's statement on "Future Relations and Cooperation between the Community and the Middle East" of 8 September 1993. Although the annex was only referring to the states of the Mashraq (defined here as covering Jordan, Lebanon, Syria, Egypt and the Occupied Territories) and Israel, similar comments have been made elsewhere with respect to the Maghreb. The document states :

The Middle East is economically and politically fragmented. The price paid for fragmentation is very high.

Military expenditure is excessive. On average, in 1979-89, it accounts for 13% of GNP in the Arab Mashraq and 19% in Israel (Europe 3%). Such non-productive expenditures are one of the most important reasons for economic backwardness...

Political centralism, which has become the response to internal fragmentation, has an economic policy counterpart. With the exception of Lebanon, each of the region's economies is dominated by public sector production and by controls on economic activity.

Autarky, which is one of the typical expressions of the economic orientations in the region, is a further manifestation of the desire to translate political control into control of economic activity. The consequences are numerous. First, the productivity of capital is very low. Second, scale of production is below optimum size. Together these two factors combine towards high cost, low volume production of goods at severely uncompetitive prices. In turn this leads to a continuation of subsidy and protection that rapidly escalate...

The region is economically failing. Syria and Jordan had annual negative growth of 2.1% and 3.9% respectively in per capita incomes in the decade after 1980. Lebanon was catastrophically worse. Egypt's growth of 2.1% in per capita incomes was still low. Even Israel could achieve only 1.5% per capita. Overall for the region income growth rate was barely 0.3% higher than population growth rate...

Along with failure of income to grow there has been recorded the usual litany of other poverty indicators. Unemployment was 20% in the Mashraq and 10% in Israel in 1990 and has increased. Current account deficits were

7.1% of GNP and budget deficits of 15% in the Arab states. Debt was 115% for the Arabs and 44% for Israel.

Human resources are poorly developed. Illiteracy in the Mashraq is double that in Lower Middle Income countries as a whole. Infant mortality is higher, life expectancy lower...

It is difficult to avoid the conclusion that the economy of the region is a failure. [1]

Whether this picture is realistic or not need not concern us here. What is significant is that this does represent the view of the European Commission on the southern Mediterranean region. It is a perspective from which concern over the protection of EC interests springs naturally.

3. The Shaping of the Relationship : the 1960s to the 1990s

The EC's relationship with the southern Mediterranean countries has passed through four main stages since the signing of the Treaty of Rome, and has recently entered a fifth stage. These stages are outlined below.

i. Laying the basis : 1957 to 1972. The Treaty of Rome gave authority to the Council of Ministers to conclude trade or cooperation agreements with outside countries. During the 1960s and early 1970s a number of these agreements were concluded with non-EC Mediterranean states. A non-preferential trade agreement with Israel was signed in 1963, followed by a preferential agreement in 1970. Lebanon concluded a non-preferential agreement with the EC in 1965, then a preferential agreement in 1972. Cooperation agreements with Tunisia and Morocco were signed in 1969. Egypt, finally, concluded a preferential trade agreement with the EC in 1972. [2]

ii. The development of an overall policy for the Mediterranean, 1973-84. Through the 1960s, the Community had become increasingly ill at ease over the piecemeal manner in which its relations with the southern Mediterranean states were handled. This led to the European Commission presenting a memorandum to the Council of Ministers in 1971, evaluating the record of the Community's economic relations with the states concerned. The memorandum stated that "the considerable overlap of political and economic interests, and the influence that Europe could have in this region make it possible to see the development of the Mediterranean basin as a natural extension of European integration". [3] The Council of Ministers responded to this memorandum by asking the Commission to develop proposals for an overall EC policy on economic relations with non-EC Mediterranean countries. These proposals were to encompass the whole range of

cooperation and exchange - not just trade, but also "general economic and technical relations" and social concerns. [4]

The resulting EC Commission proposals on an overall Mediterranean policy were passed by the Council of Ministers in November 1972, and in June 1973 the Council directed the Commission to open negotiations with non-EC Mediterranean countries (Egypt, Libya, Tunisia, Algeria, Morocco, Lebanon, Jordan and Israel were covered by this instruction). Agreements with these countries could include trading arrangements (free access to the European market for all industrial goods except for refined petroleum products and certain textiles; and limited tariff concessions on specified agricultural products); financial and technical cooperation; joint institutions (cooperation councils composed of representatives from both sides, sometimes aided by specialist committees); and, where appropriate, social affairs (such as the conditions of Maghrebi workers in Europe). [5]

Within this framework, the Community concluded wide-ranging cooperation agreements with Israel in 1975, with Tunisia, Algeria, and Morocco in 1976, and with Lebanon, Syria, Jordan and Egypt in 1977. [6] It is worth noting that it was in this same time-period that the Euro-Arab dialogue was initiated; the major meetings in the dialogue occurred over the years 1974-7.

iii. Re-shaping Mediterranean policy in light of the enlargement of the EC, 1985-90. With the expansion of the EC in the mid-1980s to include Spain, Portugal and Greece, some adaptation of the existing Mediterranean policy was needed. The expansion posed the threat, to the states of the southern Mediterranean, that their traditional exports would be increasingly disadvantaged in EC markets - given that the new members produced many of the same goods. There was, moreover, a widespread perception within the governments of the southern Mediterranean states that the advantages they had hoped to gain from their agreements with the EC had not been realised, and that the whole framework needed to be re-considered. [7]

In March 1985, the Community duly announced a new Mediterranean policy. The emphases of the new policy were to ensure that "traditional trade flows" were protected and developed, to increase EC involvement in the development of the southern Mediterranean countries, and to promote cooperation within the region. The guidelines for the Community's contribution to the economic and social development of the southern Mediterranean countries, adopted by the Council of Ministers in March 1985, specified three main areas for Community action: support for domestic food production (aimed at reducing the dependence of southern Mediterranean countries on food imports); the broadening of industrial, scientific and technical cooperation (intended to achieve greater complementarity between the economies of the

Community and those of the southern Mediterranean); and support for stronger cooperation and integration among the southern Mediterranean countries (giving priority to regional undertakings). [8] The overall framework, then, was one which was intended to involve the Community more deeply in promoting development on the southern shore of the Mediterranean.

Negotiations to adapt the existing cooperation agreements were duly opened with the southern Mediterranean countries in December 1985. New agreements, with expanded financial protocols, were concluded with Egypt, Lebanon, Algeria, Tunisia and Morocco. An agreement was also concluded with Syria in 1988, but no financial protocol was offered due to the position taken by the British government after the Hindawi affair in 1987. [9]

Over this same time-period, the EC concluded an agreement with the states of the Gulf Cooperation Council. Contacts with regard to an agreement had first started in 1981, but the agreement was not signed until June 1988 (and it was only put into effect in 1990). The GCC had sought a cooperation agreement which encompassed a free trade area arrangement (not unlike the agreements reached with the southern Mediterranean countries). What they were offered, however, was limited to general economic cooperation. [10]

iv. The New Mediterranean Policy : re-modelling Mediterranean policy in the aftermath of Iraqi occupation of Kuwait and the Gulf War, 1990-92. As with other powers and international groupings, the EC was motivated to re-assess its policies in the Middle East and Mediterranean following the Iraqi occupation of Kuwait and the ensuing Gulf War. Another factor prompting this re-assessment was the need to renew the financial protocols with the southern Mediterranean states - a process which would provide the opportunity for new priorities to be put forward. The existing protocols were due to expire in 1992.

One effect of the Iraqi occupation of Kuwait and the Gulf War was to focus attention in European circles on new structures of Mediterranean cooperation - structures which would lessen the likelihood of future conflict in the area. While the Kuwait crisis was unfolding, there was discussion of the creation of a Conference on Security and Cooperation in the Mediterranean and Middle East (CSCM). The CSCM was intended to provide a framework of cooperation (including enhanced economic exchange at every level) which would strengthen security and stability. Although the proposal was never adopted by the EC, it nonetheless benefited from some support from leading EC circles. The initiative was carried forward by Gianni de Michaelis, foreign minister of Italy, at a time when Italy held the presidency of the Council of Ministers. Almost immediately the Kuwait crisis was over, however, the CSCM proposal was formally rejected by the EC Council of Ministers - at its meeting on 11 May, 1991. [11]

At a different level, nonetheless, the EC did move towards giving more support for cooperation in the Mediterranean. The New Mediterranean Policy outlined by EC Commissioner Abel Matutes in February 1991 committed the EC to promoting cooperation in the Mediterranean through technical cooperation, feasibility studies of regional infrastructure projects, and educational and research activities. Part of the EC funding for the southern Mediterranean states would be specifically reserved for "those measures whose scope extends beyond the context of a single country and those which concern the environment". [12] There was to be an increased financial commitment of some 4.5 billion ECU for the 1992-6 period; improved market access for agricultural goods from the Mediterranean; a special fund of 300 million ECU to compensate for the adverse social effects of economic adjustment programmes in the southern Mediterranean countries; and a support programme for private enterprises of southern Mediterranean countries cooperating with EU companies. [13]

Within the framework of the New Mediterranean policy a number of small-scale projects forwarding north-south Mediterranean cooperation have been established. Among these have been the Mediterranean Environment Technical Assistance Programme (METAP) and the projects which come under the Transmediterranean Network Agency (MED-Urbs, MED-Campus, MED-Invest, and MED-Media). [14]

y. Refining the New Mediterranean Policy in the light of changing Arab-Israeli relations, 1993-. The opening of the Arab-Israeli peace talks in 1991, and the subsequent moves towards an Arab-Israeli settlement, introduced a further dynamic into EC Mediterranean policy - impelling a refinement and development of existing policy.

The refined New Mediterranean Policy took further than before the emphasis on cooperation - cooperation between the EC and the southern Mediterranean countries, and cooperation among these latter countries themselves. Cooperation, indeed, was the watchword and hallmark of the New Mediterranean Policy as it now stood (and now stands).

The EC's position was made clear in two documents: "The Future of Relations Between the Community and the Maghreb" and "Future Relations and Cooperation Between the Community and the Middle East". Both were communications from the European Commission to the Council of Ministers, and both were subsequently accepted by the Council of Ministers. The former was despatched to the Council on 30 April 1992, and the latter on 8 September 1993. [15] It is significant that "the Middle East" (which is taken by the latter document to cover Egypt, Israel, the Occupied Territories, Syria and Jordan) is now being considered separately from the Maghreb.

The Community's view that intensive cooperation constitutes the basis on which the security and stability of the Mediterranean can be based comes across most clearly from the report on policy towards the Middle East. The report states :

...The Community's own experience demonstrates that war between previously hostile parties can be made unthinkable through economic integration. While this model can not easily be transposed to the Middle East, it does suggest that the development of regional economic cooperation can be a powerful tool in reducing the level of conflict, making peace irreversible and encouraging the people of the region to learn to live in peace. In this context, the Community should support efforts by the regional parties to establish systematic forms of cooperation in areas vital to their economic progress and well-being such as energy and water. [16]

The actions which the Community should take to bolster the regional integration and cooperation process in the Middle East begin with the intensification of the EC's own cooperation with each of the countries of the region - involving a willingness to negotiate a new generation of cooperation agreements, based on reciprocal free trade. The presumption here is that this would make it easier for the regional states to establish free trade relationships among themselves. The Community will lend its financial support to regional cooperation, in particular for the financing of regional infrastructure projects and of technical assistance to the regional states. The European business community is to be encouraged to become more active in the region than in the past.

Some of the specific measures which the EC could take to encourage regional cooperation are exerting pressure for the facilitation of trade (opening up border crossings; allowing for the transit of goods and people within the region; reducing excessive levels of protection etc.); financing a general transport study, with a view to developing a more efficient region-wide road system; financing a study on the benefits and technical modalities of interconnecting the electricity grids; supporting moves to improve the legal status of migrant workers in the region (labour migration being deemed an important factor in balancing supply and demand for labour); promoting joint projects in tourism; and exploring possibilities for water-sharing and the joint management of water resources. [17]

The document "The Future of Relations between the European Community and the Maghreb" opens with some stirring words calling for a new relationship :

The Community must develop a new concept on which to base its relationship with the Maghreb, setting itself

targets which are both realistic and ambitious...

The new Community approach should be based on the realisation that the time has come to move away from the idea of development cooperation that has held sway over the past few decades, to the idea of partnership, engendering new forms of cooperation in all fields, whether political, social or economic.

For its part, the Community will make a firm and convincing commitment to help relaunch the Maghreb economy.

For their part, the Maghreb countries will commit themselves to continue with the reform process and to take concrete measures to promote regional integration.
[18]

The proposal is made that new agreements, to be called Euro-Maghreb agreements, should be negotiated with the three Maghreb countries, and that the agreements should have four main components : a political dialogue; economic cooperation (specifically in fields which would encourage economic development, such as investment, macroeconomic issues, technological exchange etc.); free trade ("creation of an open economic area, an area of trade and stability"); and financial cooperation.

The EC has, therefore, made clear its intention to move towards increased cooperation across the Mediterranean. What will follow from this, however, remains to be seen.

4. North-South Mediterranean Trade

Rather than repeat at length material which appears in the trade statistics, it seems appropriate to provide the relevant trade statistics themselves. This is done in the tables and figures at the end of the paper - constituting a selection of the most important statistical information.

The first two tables and four figures cover the development of trade in the years up to 1986. Figure 1 shows that the EC in 1986 accounted for 35% of Arab exports, and 43% of Arab imports. Tables 1 and 2 indicate that the balance of Arab exports to the EC had shifted substantially over the years 1970-86, in terms of the exporting countries : the share of the Mediterranean Arab states had declined, while that of the Gulf oil-producers increased. Figures 2-4 show France, Germany and Italy well ahead of other EC countries in their trade with non-EC Mediterranean countries over the 1970-85 period, and generally vying for the leading position.

Table 2 (a) follows the pattern of EC-Arab world trade through the 1986-90 period. Over these years the proportion of EC trade accounted for by the Arab countries declined. The proportion of Arab exports which went to the EC also declined, while the proportion of Arab imports which came from the EC increased. The Mediterranean Arab countries slightly improved their share of EC trade as against that of the non-Mediterranean Arab countries.

Tables 3-9 cover different aspects of EC-Mediterranean trade over the years since 1991. Table 3 shows that the EC accounted for 42.8% of imports into the Middle Eastern region in 1991. Table 4 indicates that France, Italy and Germany were still the Arab world's main trade partners in 1992, with the two former having a clear edge over Germany. Britain was not far behind as an exporter to the region, but was less prominent as an importer (largely because it imported less oil). Table 5 reveals that, on the Arab side, Saudi Arabia accounts for almost twice as much EC trade as any other Arab country (with Algeria in second position). Nonetheless, as shown in Table 6, it is in fact the North African Arab countries who have the highest proportion of their trade directed to the EC - well over 50% in every case (indeed, well over 60% in every case except that of Egypt).

The relative positions of the Arab countries in EC trade as against the non-Arab and non-EC Mediterranean countries' positions, is portrayed in Tables 7-9. Whereas Turkey stood 10th. in the ranking of the EC's global trading partners in 1993, and Israel 21st., the leading Arab Mediterranean trading partner (Algeria) ranked 27th.

Taking Euro-Arab trade as a whole, the 1992 Direction of Trade Statistics show that the EC had a relatively small surplus of about \$3,137 million on its trade with the 20 principal Arab countries in that year - exporting about \$49,844 million worth of goods and importing \$46,707 million. This trade with the Arab world constituted about 9% of the Community's exports to non-EC countries, and 8% of EC imports from outside. It is worth recalling, however, that the largest Arab trading partner was Saudi Arabia - not a Mediterranean state. [19]

Overall, the pattern which emerges from this is of an area which is no doubt economically important to the EC, but hardly of critical importance. In terms of the EC's main trading areas, the Mediterranean accounts for a similar proportion of EC trade as does Eastern Europe. The proportions of EC trade accounted for by North America and the Far East are each almost double that of the Mediterranean.

To the southern Mediterranean countries, conversely, the EC is critically important. In every one of the Arab Mediterranean states, the proportion of their exports going to the EC has risen

substantially over the period since 1985 (see Table 6). The EC in 1992 was taking 57.5% of Egyptian exports, 87.2% of Libyan exports, 75.6% of Tunisian exports, 74.8% of Algerian exports, and 67.0% of Moroccan exports.

4. Population Balance and Labour Migration

The population balance around the shores of the Mediterranean is currently undergoing a substantial shift. While the population on the northern shore is growing by less than 0.3% per annum, the increase on the southern and eastern shores is growing by 2.5% per annum. [20] The rates of population increase in some of the Arab Mediterranean countries, indeed, are the highest in the world - specifically those of Jordan (3.77% in 1992) and Syria (3.56% in 1992). [21] Whereas the fertility rates in Italy and Spain (1.3 births per woman) are among the lowest in the world, those in Libya (6.4) and Algeria (5) are among the highest in the world. [22]

The impact of the differential in these population growth rates over the next 20 years will be substantial. The population of the Maghreb is expected to increase by 55% over the 1990-2010 period, rising from 58 million to 90 million. The population of the Mashrak (as defined earlier) will rise by 61%, from 83 million to 134 million. The population increase in Israel will be more limited (a rate of around 40%), rising from 5 to 7 million. The total population of the states bordering the southern and eastern shores of the Mediterranean will, according to these projections, rise from 146 million in 1990 to 231 million in 2010. [23] It should be noted, moreover, that these figures do not cover Turkey, whose population is expected to reach 100 million by 2025.

Population increase in countries which do not touch the Mediterranean, but which have links with the Mediterranean environment, moreover, should also be borne in mind. If the projected populations of Sudan and Ethiopia for 2025 are added together with the projected population of Egypt for that year, for example, the total comes to 276.6 million - almost equal to the 1990 population of the United States and Canada.

It is easy, but not always useful, to be alarmist about population figures, and there is a danger that such alarm can be used in the cause of racism. While avoiding such an approach, it will clearly be important for the EC to pursue policies which enable the southern Mediterranean countries to engender the jobs and food needed by their growing populations. A reasonable level of labour migration to Europe can be of benefit to both sides.

5. Conclusion

The security problems for the European Community in the Mediterranean area, on the basis of the socio-economic relationship, will (paradoxically) stem not from the Community's dependence on the region but from its lack of dependence. There will be a strong temptation for the Community to focus attention on Eastern Europe and elsewhere, knowing that its economic stake in the Mediterranean is not of overwhelming importance and that the southern Mediterranean countries are in any case beholden to the EC for their economic survival. Such an approach would be disastrous for the security and stability of the Mediterranean region. The EC's current emphasis on promoting cooperation in the region constitutes the correct approach; but it remains to be seen whether this can be followed through in policy terms.

NOTES

1. Communication from the European Commission, COM (93) 375, 8 September 1993.
2. Commission of the European Communities, *The European Community and the Arab World* (Directorate-General for Information, Brussels, 1982), p.1.
3. Commission of the European Communities, *Europe-South Dialogue* (Commission of the European Communities, Brussels, 1984), p.10.
4. *Ibid.*
5. Niblock, Tim, "The Role of the European Community in the Middle East", in Ismael, T. and J. (eds.), *The Gulf War and the New World Order* (University Press of Florida, Gainesville, 1994), p. 118.
6. Jawad, H., *Euro-Arab Relations : a Study in Collective Diplomacy* (Ithaca Press, Reading, 1992), p.51.
7. Buysse, D., *The Effects of Enlargement on Other Mediterranean Countries* (Europe News Agency, Brussels, 1984), pp. 4-5.
8. Niblock, pp.119-120.
9. Commission of the European Communities, *Twenty-Second General Report on the Activities of the European Communities, 1987* (Office for Official Publications of the European Communities, Luxembourg, 1988), p.366.
10. Niblock, p.121.

11. Landgraf, M., "The Impact of the Second Gulf War on the Middle Eastern Policy of the European Union", unpublished paper presented to the conference of the British Society for Middle Eastern Studies, University of Warwick, July 1993, p.8.
12. Commission of the European Communities, "Proposal for a Council Regulation Concerning Financial Cooperation in Respect of all the Mediterranean Non-Member Countries", COM (91) 48, 19 February 1991.
13. Landgraf, p.5.
14. Landgraf, p.13.
15. Communication from the Commission of the European Communities, COM 93 (375), 8 September 1993.
16. Ibid.
17. Rhein, E., "Sustaining the Middle East Peace Process Through Cooperation : the Commission's Strategy", unpublished paper presented at the Federal Trust, London, 22 October 1993. As Dr.Rhein was Director of the department covering the Middle East and North Africa, the paper may be regarded as reflecting Commission views.
It should be noted that the Commission's positions adopted in 1992 and 1993 had to some extent been foreshadowed in a report commissioned by the EC Commission. This was published in 1992. See Nonneman, G., (ed.), *The Middle East and Europe : an Integrated Communities Approach* (Federal Trust, London, 1992).
18. Communication from..., Annex 3/2.
19. "Community Registers Surplus on Trade with Arab States", *Arab-British Commerce*, March 1994, pp.7-9.
20. Wilson, R., "A European View of the Middle East Peace Process", unpublished paper presented to a conference at Georgetown University, 21 September 1994.
21. Communication from..., Annex 2/4.
22. Ibid.
23. Ibid.

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