DISPUTE RESOLUTIONS

The Bi-Monthly Newsletter of the Nani Palkhivala Arbitration Centre

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Message to the Readers

Concerns in recording evidence during online arbitration

Many well-established arbitral institutions worldwide are currently hearing a significant number of international arbitrations online.

For instance, due to the health hazards that the raging pandemic threatens humanity with, many arbitral institutions including the Singapore International Arbitration Centre (SIAC) have turned to video-conferencing to assist in the conduct of hearings. The technology adopted by them, readily available through many arbitration service providers, allows proceedings to be conducted remotely with participants joining hearings via a live-stream.

Similar organisations worldwide have adopted comparable measures. The London Court of International Arbitration (LCIA) for example will only deal with matters by email, with all applications, documents etc. being transmitted electronically. The ICC International Court of Arbitration has also turned to extensive use of technology that promote online arbitrations. We at the NPAC also offer these services details of which appear on *page 9* of this newsletter.

Some of the widely used more sophisticated technological tools in international arbitrations are - Polycom Real Presence Group 700 video conferencing facilities provided by Maxwell Chambers at SIAC which can connect up to 50 remote parties, and BlueJeans video conferencing software. The e-hearing partner was Opus2, a tenant at Maxwell Chambers, which provided both the e-hearing platform and real-time transcription services.

Many of these video conferencing facilities operate without difficulty and with very minimal time lag. As one participant in an online hearing describes it *"This was impressive given that at one point we had counsel in England cross examining a witness in Australia with the tribunal and other participants in the hearing room in Singapore."*

Writing for Kluwer Arbitration blog on 'Due process concerns in virtual witness testimonials: An Indian perspective', Saniya Mirani points out that the uncertainty of the return to normalcy has forced parties to adapt to a new normal, by relying entirely on virtual hearings, including virtual witness testimonies. As parties get more comfortable with technology and realise the associated time/cost benefits, virtual witness testimonies are likely to become more prevalent.

Having said that, the writer also points out that *"there is a need to analyse the manner in which procedural safeguards such as, 'due process', would play out in virtual witness testimonies, in order to enable fair and proper hearings."*

One widely prevalent due process concern is that witnesses may, during the course of the trial, be tutored using concealed means of communications.

The other concern which the author of the article also points out: *"Moreover, the credibility of virtual testimony, particularly in cross-examinations, has been questioned as the practice involves analysing body language and non-verbal cues of the witness, such as eye gestures, gesticulation, and expressions, which becomes difficult during virtual hearings."*

The solution for these concerns lies in using the appropriate technology. Using HD video quality would ensure that facial expressions and body gestures are clearly visible. By adopting technologies that allow rotating or 360-degree view cameras, parties/tribunals may monitor the witness and their surroundings. This then allows them to ensure that he or she is not accessing other devices or persons for being coached. Additionally, certain software applications/extensions block other web-pages for communication while the hearing is in progress and these can be used.

Yet another layer of protection comes with adopting good and effective protocols on video conferencing by tribunals, before they proceed with the hearing online. For instance the 'Seoul Protocol on Video Conferencing in International Arbitration', addresses a majority of these concerns.

So clearly the way to go is to put in place well tested and reliable protocols applicable to online arbitrations and provide the best possible technology support to the exercise.

While the Arbitration and Conciliation Act 1996 is silent on video-conferencing, the recording of witness testimony through video-conferencing has been permitted by the Indian Supreme Court even in civil proceedings where the presence of witness is required, but the problem is that the witness cannot appear without an unreasonable amount of delay, expense or inconvenience. (***State of Maharashtra vs. Dr. Praful Desai, (2003) 4 SCC 601***)

Also, in cases where witnesses have been unable to attend physically on account of poor health conditions, financial burden, old age or residing abroad, testimonies have been taken through video-conferences. (***The State of Maharashtra vs. Chandrabhan Sudam Sanap, 2018 SCC OnLine Bom 6576; Zaishu Xie & Another vs. The Oriental Insurance Company Ltd. & Others, 2014 (207) DLT 289; Amitabh Bagchi vs. Ena Bagchi, 2004 SCC OnLine Cal 93***)

In a civil proceeding, the Calcutta High Court directed a witness present in Russia to present himself for a cross-examination through video-conference (***Saraf Agencies Private Limited vs. Federal Agencies for State Property Management, 2018 SCC OnLine Cal 5958***). The Madras High Court has also encouraged parties to arbitration proceedings (who were from different parts of the country), to conduct the entire arbitration via video-conference ***(Axis Bank vs. M/s Nicco UCO Alliance Credit Limited, 2017 SCC OnLine Mad 33928)***.

Of course, in course of time, technologically assisted arbitration proceedings may hit a few roadblocks. However, such obstacles are eminently manageable and we may safely assert that technology assisted arbitrations are here to stay.

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LEGAL UPDATES

❖ India's challenge to arbitration awards pertaining to retrospective taxation

- India has filed an appeal in Singapore against the verdict of the Permanent Court of Arbitration, Hague ("**PCA**") on the premise that it has the sovereign right of taxation.
- The PCA overturned India's demand for back taxes from Vodafone Group Plc., holding it in breach of breach of the India-Netherlands bilateral investment treaty.
- On similar lines, India is also likely to challenge the arbitration award delivered against it in the retrospective tax amendment case with Cairn Energy Plc.
  https://www.business-standard.com/article/companies/india-challenges-vodafone-arbitration-award-plans-the-same-in-cairn-case-120122401064_1.html

❖ Arbitration and Conciliation Ordinance, 2020 promulgated

- The President of India promulgated the Arbitration and Conciliation (Amendment) Ordinance, 2020 on 4th November, 2020 ("**Ordinance**").
- This Ordinance amended Section 36 of the Arbitration and Conciliation Act, 1996 to ensure that all the stakeholder parties get an opportunity to seek an unconditional stay on enforcement of arbitral awards where the underlying arbitration agreement or contract or making of the arbitral award are induced by fraud or corruption.
- The Ordinance also did away with the 8th Schedule of the Arbitration and Conciliation Act, 1996 which contained the necessary qualifications for accreditation of arbitrators.
  https://economictimes.indiatimes.com/news/economy/policy/government-issues-ordinance-to-amend-arbitration-law/articleshow/79045017.cms?from=mdr

❖ India's first maritime arbitration centre

- India's first arbitration and mediation centre 'Gujarat Mediation and Arbitration Centre' focusing on disputes related to the shipping sector will come up in Gujarat International Finance-Tech City in Gandhinagar.
  https://timesofindia.indiatimes.com/city/ahmedabad/indias-first-maritime-arbitration-centre-to-be-set-up-in-gift-city/articleshow/79765502.cms

❖ Delhi HCjudgment pertaining to Future Amazon Arbitration

- Amazon had filed for an arbitration claiming that its contracts with Future Coupons Ltd barred a transaction between Future Retail Ltd ("**FRL**")and Reliance Industries Ltd ("**RIL**").
- An emergency arbitrator at the Singapore International Arbitration Centre ("**SIAC**") issued an interim award which put a hiatus on the deal between Future group and RIL.
- The Delhi High Court upheld the legal status of the emergency arbitration based on the fact that the parties had voluntarily chosen the arbitration to be governed by the SIAC rules which have a provision for approaching an emergency arbitrator for interim relief.
- Justice Mukta Gupta also declined FRL's plea for restraining Amazon from writing to SEBI, CCI and other authorities about the arbitral order.

- However, the court also made observations on the fact that the contracts between Amzon and FCL transgress from a protective right to a controlling right in favour of Amazon. "*Besides creating protective rights, the conflation of the three agreements showed that it transgressed to control over Future Retail, which would require government approvals and, in its absence, will be contrary to FEMA-FDI rules.*"
  https://www.bloombergquint.com/law-and-policy/future-retail-vs-amazon-delhi-high-court-upholds-legal-status-of-emergency-arbitrators
  https://www.financialexpress.com/industry/delhi-high-court-rules-amazons-attempt-to-control-future-violative-of-fema-fdi/2156211/
  https://www.livemint.com/companies/news/delhi-hc-declines-future-retail-s-plea-for-injunction-order-against-amazon-11608528221801.html

❖ **New ICC Arbitration Rules**

- The International Court of Arbitration of the International Chamber of Commerce (ICC) issued revised Rules of Arbitration that will become effective from January 1, 2021.
- According to ICC, these amendments aim to make ICC arbitrations "*even more attractive, both for large, complex arbitrations and for smaller cases*" and focus on efficiency, flexibility and transparency.
- The new rules cover provisions on investment treaty arbitrations, third party funding, expedited proceedings, joinder of parties and consolidation of proceedings, virtual hearings, additional awards, changes in party representation, court appointment of arbitral tribunal.
- Earlier, the London Court of International Arbitration had also announced an 'update' to its Arbitration Rules, which came into effect on October 1, 2020.
  https://www.lexology.com/library/detail.aspx?g=073acfd6-7756-48a7-8c5b-9814edc2725a

❖ **Section 11 of Arbitration Act includes aspect of 'validity of agreement'**

- A three-judge bench of the Supreme Court comprising Justices NV Ramana, Sanjiv Khanna and Krishna Murari in the case ***Vidya Drolia and others vs. Durga Trading Corporation*** held that landlord-tenant disputes under the Transfer of Property Act are arbitrable when they are not covered by rent control laws.
- The Court observed that the expression 'existence of arbitration agreement' in Section 11 of the Arbitration Act would include the aspect of validity of arbitration agreement *"Existence and validity are intertwined, and arbitration agreement does not exist if it is illegal or does not satisfy mandatory legal requirements. Invalid agreement is no agreement."*
  https://www.livelaw.in/top-stories/arbitration-agreement-existence-validity-section11-section8-

LIMITATION PERIOD FOR ENFORCEMENT OF FOREIGN AWARDS: DONE & DUSTED?

INTRODUCTION

A plain reading of the Arbitration and Conciliation Act, 1996 (hereinafter **"1996 Act"**) would suggest that India has adopted and incorporated 'The Convention on the Recognition and Enforcement of Foreign Arbitral Awards'[1] better known as the New York Convention, 1958 (hereinafter "**New York Convention**") into Part II of the 1996 Act. However, merely adopting the New York Convention would not be sufficient. An effective and efficient implementation of the New York Convention is one of the determinative factors for turning the Indian jurisdiction into an arbitration-friendly seat.

One of the critical issues under Part II of the 1996 Act has been the lack of authoritative and lucid provisions on the applicable limitation period for enforcement of foreign awards in India. However, in its recent decision in the case of ***Government of India vs. Vedanta Limited &Ors.***[2]*("**Vedanta Case**")*,the Hon'ble Supreme Court of India has cleared the air on this issue. After several differing opinions[3] of the various High Courts, the Supreme Court has authoritatively observed that Article 137 of the Limitation Act, 1963 (hereinafter "**1963 Act**") will govern the enforcement of foreign awards in India.

The present article aims to *(i)* highlight certain fundamental aspects connected with the recognition and enforcement of foreign awards, *(ii)* analyze the decision of the Supreme Court in the ***Vedanta Case*** with specific focus on limitation period, and *(iii)* succinctly evaluate the way forward.

RE-VISITING THE FUNDAMENTALS

It is pertinent to first discuss and understand certain fundamentals pertaining to foreign awards and their enforcement from the perspective of the 1996 Act.

a. ***'No automatic'recognition & enforcement:*** While domestic awards under Part I of the 1996 Act attain automatic status for enforcement as deemed 'decrees'(subject only to a challenge under Section 34 of the 1996 Act),foreign awards are merely arbitral awards until the *'court records its satisfaction'*.It is only then that they achieve the status of a deemed decree, as provided under Section 49 of the 1996 Act.

b. ***The absence of Code of Civil Procedure, 1908 under Section 49:*** Section 49 of the 1996 Act *(enforcement of foreign awards)* is 'not similarly worded' as Section 36of the 1996 Act *(enforcement of domestic awards)*. While the latter highlights the enforcement of domestic awards as per the Code of Civil Procedure, 1908 (hereinafter **"CPC"**), the former does not mention enforcement per CPC.

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[1]Convention on the Recognition and Enforcement of Foreign Arbitral Awards, June 10, 1958, U.S.T. 2517, 330 U.N.T.S. 38.

[2] Government of India v. Vedanta Limited &Ors., 2020 SCCOnLine SC 749 (India).

[3]ArushiPoddar, ChintanNirala, 'The Ambiguous Time- Bar for Enforcement of Foreign Awards in India', Kluwer Arbitration Blog, (July 28, 2020), http://arbitrationblog.kluwerarbitration.com/2020/07/28/the-ambiguous-time-bar-fo r-enforcement-of-foreign-awards-in-india/.

c. ***Difference between 'Enforcement' & 'Execution':*** The lawmakers did not use and did not intend to use 'enforcement' and 'execution' interchangeably and thereby maintained the difference between enforcement of foreign awards and execution of decrees under Order XXI of the CPC.

d. ***'Refusal' of Enforcement and no review into the merits:*** Per Section 48 of the 1996 Act under Part II, the enforcement court can only 'refuse' the enforcement of the foreign award and cannot 'set aside' the foreign award.

ANALYSIS OF THE DECISION

In its judgment on the ***Vedanta Case,*** the Supreme Court has opined on two critical points: *firstly*, it settles the law on the applicable limitation period for enforcement of foreign awards; *secondly*, it clarifies and reiterates the position of Indian courts on the nature of proceedings for dealing with applications made under Section 48 of the 1996 Act*(conditions for enforcement of foreign awards)*. Bearing in mind the fundamentals as discussed above, this part of the Article aims to discuss the reasons enunciated by the apex court in the said case.

a. ***Clarifying the appropriate Limitation Period:*** The Supreme Court looked into several cases of various High Courts with differing observations and findings on this issue of limitation. As per *one* such view, the enforcement would run into 2 stages wherein: Article 137 of the 1963 Act would first apply for enforcement. Once the enforcement is decided, the second stage would be governed under Article 136 of the said 1963 Act for the purposes of execution of the foreign award as a deemed decree. A *second* divergent view suggested the applicability of Article 137 of the 1963 Act i.e. when the 'right to apply' accrues. A *third* view pertained to the applicability of Article 136 of the 1963 Act that provides for a long period of 12 years for the enforcement of a decree of any civil court.

   Bearing in mind the entire procedural history of the present case along with all divergent views, the apex court was inclined to observe that [only] Article 137 of the 1963 Act will be applicable with regard to the enforcement of foreign awards. This observation was based on the premise that Article 136 applies to decrees passed by an Indian court and will not apply to foreign awards. Thus, applicability of Article 136 will be confined to the decrees passed by courts in India. Incidentally, the 1963 Act does not provide for any specific limitation period for foreign awards, and thus the residuary provision of Article 137 would apply for the enforcement of foreign awards.

B. ***The Deeming Fiction:*** In connection with the application of Article 137 of the 1963 Act, the Supreme Court observed that it is only a deeming fiction that a foreign award turns into a deemed decree i.e. for the limited purpose of enforcement only. A similar principle applies to domestic awards, which are also construed to be deemed decrees only for the limited purposes of execution. Referring to the fundamentals highlighted above, the foreign award will only take the recourse to Order XXI of the CPC for purposes of execution as a deemed decree. It will attain this status of a deemed decree only after going through the stages under Sections 47 and 48 of the 1996 Act in order to get to Section 49 for enforcement.

The judgment in the case of ***Bank of Baroda vs. Kotak Mahindra***[4] had certain ramifications that the present decision in the ***Vedanta Case*** has done away with. The ***Vedanta Case*** also made observations on the 'Double Exequatur' principle.[5] Per this principle, it was mandatory to seek leave from the seat court for enforcement of a foreign award before enforcement in the forum country. However, 'Double Exequatur' was done away with by the New York Convention. It is our view that this point would help in avoiding any future litigation regarding enforcement of foreign awards.

c. ***Applicability of Section 5 of the 1963 Act:*** Section 5 of the 1963 Act covers the instance where an applicant may seek condonation of delay for the enforcement of a foreign award after the lapse of a period of 3 years. However, this would preclude an application made under Order XXI of the CPC. The court further clarified that an application under Section 47of the 1996 Act does not tantamount to initiating proceedings under Order XXI. The court also observed that the delay may be condonedsubject to the facts and circumstances of the case.

d. ***Nature & Role of Enforcement Court:*** As discussed here in above, under Section 48 of the 1996 Act, enforcement may only be refused and the foreign award cannot be set aside. Accordingly, the court observed that, the power to set aside the award vests with the seat courts only. This is in accordance with the wording employed under the said Section 48 that adopts a 'permissive nature rather than a mandatory language.'

THE WAY FORWARD

The present judgment under the ***Vedanta Case***is yet another addition to a pro-arbitration regime, as India attempts to become an arbitration-friendly seat. The judgment has provided a strong plinth towards settling a void and strengthening the legal infrastructure. However, two aspects in relation to enforcement of foreign awards viz., *(i)* interpretation of 'when right to apply accrues' and *(ii)* granting condonation of delay, may potentially be the next facets that we need to watch out for. Thus, it would be appropriate to highlight an old ditty to conclude *there are still miles to go before we sleep and miles to go before we sleep.*

This article is authored by Vivek Joshi, a graduate from Symbiosis Law School, Hyderabad &Rohan Gulati, a 4th year law student of Symbiosis Law School, Hyderabad. Views of the authors are personal.

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[4]Bank of Baroda v. Kotak Mahindra, 2020 SCCOnLine SC 324 (India).
[5]Globalarbitrationreview.com, Enforcement under the New York Convention, (September 25, 2020) https://globalarbitrationreview.com/chapter/1178556/enforcement-under-the-new-%E2%80%89york-convention.

ONLINE ARBITRATION TRAINING FOR PWD ENGINEERS

Per the records of the Ministry of Law and Justice, there are more than 3 crore cases pending before various courts of India and 46% of these involve Government Departments or Government bodies. To reduce litigation by the Government and discourage them from going to courts for all their disputes, the Department of Justice, Government of India suggested that Government departments / organisations should explore alternate dispute resolution methods ("**ADR**"). This step will also facilitate quicker resolution of disputes and will enhance India's performance in the World Bank's Ease of Doing Business Index.

Accordingly, Government officials need to be equipped to handle disputes more effectively through alternate methods, thus saving on time, energy and financial resources. As a part of the Government's endeavour to create awareness about ADR, NPAC has been conducting training programmes for various Government organizations and officials.

Recently, NPAC in association with Mahatma Gandhi State Institute of Public Administration ("**MGSIPA**") conducted online training programmers on Arbitration and contract management for Engineers of the Public Works Department, Punjab ("**PWD**"). MGSIPA is an institute established by the Government of Punjab, similar to the Government of India academy in Mussoorie, for imparting training to its employees, amongst other activities like undertaking research, consultancy, and allied activities to improve management efficiency in the various areas of public administration particularly those areas which are characterized by deficits in the system leading to poor performance and inefficiency.

The interactive online training course which was conducted for three batches of engineers (on 30th October, 3rd November and 6th November, 2020) was carefully designed and customized to include key elements of arbitration, law of contracts and contract management andwas handled by eminent lawyers in a manner that is immediately relevant for bureaucrats and engineers, making this event one of a kind.

Each day began with an inaugural function *inter alia* attended by a retired judge, members of NPAC, members of MGSIPA and the PWD engineers. The first four sessions introduced arbitration & conciliation and covered- essential conditions for a valid arbitration agreement; key steps, issues and developments in the law and practice of arbitration in India; nuances surrounding 'Appointment of Arbitrators' including the aspects of qualification, eligibility, unilateral appointment and challenge to appointment of arbitrators; and appeals and limitations in relation to arbitrations. These theoretical sessions were followed by practical sessions which explained guidelines and principles for contract management, imparted training for writing a case summary / synopsis, and discussed live case studies.

The eminent list of panelists, faculty and attendees included Justice Ibrahim Kalifulla, Justice K. Kannan, Justice PrabhaSridevan, **Ms. Jaspreet Talwar** *(Principal Secretary, Punjab & Director, MGSIPA)*, **Mr. Amit Talwar** *(Head of Department, Water Supply & Sanitation)*, Senior Advocates, leading arbitration practitioners, Directors of NPAC and members of the Advisory Committee of NPAC.

We are happy to share that the programme was very well received by the panelists, faculty and attendees alike and provided great impetus for conducting such programmes in the future. We look forward to many such interactions and events, which we believe will go a long way in equipping India to deal with disputes better and eventually become a global hub for arbitration.

NPAC Offers Virtual Hearing Rooms for Arbitration Proceedings

Nani Palkhivala Arbitration Centre (NPAC) has been offering video conferencing facilities for conducting arbitration proceedings, to facilitate seamless resolving of disputes anytime and anywhere.

In addition to this, NPAC has now also partnered with Centre for Online Resolution of Disputes (CORD) as a joint dispute resolution technology provider with an aim to facilitate fair, fast, seamless and accessible dispute resolution through a secure online platform, a bouquet of modular services and a panel of expert neutrals. NPAC - CORD offers virtual hearing rooms tailor made for conduct of arbitration hearings. The hearing rooms come with rich features and services like breakout rooms, access controls, technical assistance and transcription, at affordable prices. NPAC - CORD's virtual hearing platforms are designed to enable the participants of a hearing to focus on the resolution process and not on the technology they are using.

How it Works:

- Once a booking for an arbitration case is registered with NPAC with all attendant formalities, the email ids and contact details of all stakeholders are to be provided to the Registrar of NPAC. The Registrar would then circulate an invitation via email for the video conference.
- At the scheduled time, all stakeholders are to click on the link provided in the email and enter their name to begin the session. Each participant can then choose to control their audio and video through the controls provided.
- During the session, the participants would be able to send chat massages to the group or upload documents.
- There are a few other features to the video conferencing and certain additional controls for the host of the meeting that ensure ease of conducting the arbitration proceedings.

Features:

- **Virtual Hearing Rooms** Video conferencing, text / audio / video messaging and screen sharing, secure document storage, moderator privileges, live-streaming and recording.
- **Breakout Rooms** All features of the main hearing room, private rooms each for the claimant, respondent and the tribunal, seamless movement from main room to breakout rooms, can be used simultaneously with the main hearing room.
- **Technical Assistance** Dedicated technical assistant for each hearing, demos for all participants and ribunal members, setting up and moderation of hearings.
- **Transcription** Realtime transcription or delayed transcription (2 days) or transcripts from audio / video recordings.
- **Stenographers** Arbitration experienced stenographers trained by NPAC and CORD (as applicable), experienced in virtual hearings.
- **Document bundling / unbundling** - Creation of digital document bundle, unbundling and book marking for faster access during hearing.

Experience the new and improved way of resolving disputes, even during a pandemic!!

To register and try it yourself, please contact us through the details provided on page 10.

THE 39TH PALKHIVALA MEMORIAL LECTURE

On behalf of the Palkhivala Foundation, we are happy to invite you all for the 39th Palkhivala Memorial Lecture proposed to be delivered on **16th January, 2021** by **Mr. Shaktikanta Das**, Governor, Reserve Bank of India on the topic 'Towards a Stable Financial System'.

In the words of our Director Mr. R. Anand:

"As we head towards the 101st birthday of Nani Palkhivala which falls on January 16th 2021, we at the Palkhivala Foundation remember our 18 year journey since the inception of the Foundation in 2003. We have come a long way since then and are fortunate to have conducted 38 public lectures of high quality over this period. Last year, the Nani Palkhivala Centenary Lecture was delivered by the Honourable Finance Minister, Ms Nirmala Sitharman on January 19th 2020 on the subject 'Road Map towards 5 Trillion Dollar Economy'. The 39th Palkhivala Memorial Lecture is scheduled to be delivered on January 16th 2021 by Mr. 'Shaktikanta Das, Governor, Reserve Bank of India on the topic 'Towards a Stable Financial System'.

At the Foundation, we have been fortunate thus far in getting the type of speakers who either knew Palkhivala directly or could relate to him in some way. The challenge with every passing year is that the number people directly associated with him will come down. It is here that we will aspire to involve the next generation of lawyers to embrace this initiative of the Foundation and ensure that the continuity of public lectures is maintained. Subjects relating to constitutional law, macro-economics and monetary policies were close to Palkhivala's heart and our attempt would be to focus on these subjects and discuss them in the context of changing times. Matters relating to good governance were covered in detail in each of Palkhivala's budget speeches and we are focusing on this aspect as well.

For the first time, the upcoming Memorial Lecture will be in virtual form on account of the pandemic situation, but hopefully we should be back in physical mode from 2022 onwards."

For further details on the 39th Palkhivala Memorial Lecture, please contact us through the details provided below.

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