

COUNTRYLEGAL SYSTEMAfghanistan

mixed legal system of civil, customary, and Islamic (sharia) law

Akrotiri

laws applicable to the Cypriot population are, as far as possible, the same as the laws of the Republic of Cyprus; note - the Sovereign Base Area Administration has its own court system to deal with civil and criminal matters

Albania

civil law system except in the northern rural areas where customary law known as the "Code of Leke" is still present

Algeria

mixed legal system of French civil law and Islamic law; judicial review of legislative acts in ad hoc Constitutional Council composed of various public officials including several Supreme Court justices

American Samoa

mixed legal system of US common law and customary law

Andorra

mixed legal system of civil and customary law with the influence of canon (religious) law

Angola

civil legal system based on Portuguese civil law; no judicial review of legislation

Anguilla

common law based on the English model

Antarctica

Antarctica is administered through annual meetings - known as Antarctic Treaty Consultative Meetings - which include consultative member nations, non-consultative member nations, observer organizations, and expert organizations; decisions from these meetings are carried out by these member nations (with respect to their own nationals and operations) in accordance with their own national laws; more generally, the Antarctic Treaty area, that is to all areas between 60 and 90 degrees south latitude, is subject to a number of relevant legal instruments and procedures adopted by the states party to the Antarctic Treaty; note - US law, including certain criminal offenses by or against US nationals, such as murder, may apply extraterritoriality; some US laws directly apply to Antarctica; for example, the Antarctic Conservation Act, 16 U.S.C. section 2401 et seq., provides civil and criminal penalties for the following activities unless authorized by regulation or statute: the taking of native mammals or birds; the introduction of nonindigenous plants and animals; entry into specially protected areas; the discharge or disposal of pollutants; and the importation into the US of certain items from Antarctica; violation of the Antarctic Conservation Act carries penalties of up to \$10,000 in fines and one year in prison; the National Science Foundation and Department of Justice share enforcement responsibilities; Public Law 95-541, the US Antarctic Conservation Act of 1978, as amended in 1996, requires expeditions from the US to Antarctica to notify, in advance, the Office of Oceans and Polar Affairs, Room 2665, Department of State, Washington, DC 20520, which reports such plans to other nations as required by the Antarctic Treaty; for more information, contact antarctica@state.gov

Antigua and Barbuda

common law based on the English model

Argentina

civil law system based on West European legal systems; note - in mid-2015, Argentina adopted a new civil code, replacing the old one in force since 1871

Armenia

civil law system

Aruba

civil law system based on the Dutch civil code

Ashmore and Cartier Islands

the laws of the Commonwealth of Australia and the laws of the Northern Territory of Australia, where applicable, apply

Australia

common law system based on the English model

Austria

civil law system; judicial review of legislative acts by the Constitutional Court

Azerbaijan

civil law system

Bahamas, The

common law system based on the English model

Bahrain

mixed legal system of Islamic (sharia) law, English common law, Egyptian civil, criminal, and commercial codes; customary law

Bangladesh

mixed legal system of mostly English common law and Islamic law

Barbados

English common law; no judicial review of legislative acts

Belarus

civil law system; note - nearly all major codes (civil, civil procedure, criminal, criminal procedure, family, and labor) were revised and came into force in 1999 and 2000

Belgium

civil law system based on the French Civil Code; note - Belgian law continues to be modified in conformance with the legislative norms mandated by the European Union; judicial review of legislative acts

Belize

English common law

Benin

civil law system modeled largely on the French system and some customary law

Bermuda

English common law

Bhutan

civil law based on Buddhist religious law

Bolivia

civil law system with influences from Roman, Spanish, canon (religious), French, and indigenous law

Bosnia and Herzegovina

civil law system; Constitutional Court review of legislative acts

Botswana

mixed legal system of civil law influenced by the Roman-Dutch model and also customary and common law

Bouvet Island

the laws of Norway apply where applicable

Brazil

civil law; note - a new civil law code was enacted in 2002 replacing the 1916 code

British Indian Ocean Territory

the laws of the UK apply where applicable

British Virgin Islands

English common law

Brunei

mixed legal system based on English common law and Islamic law; note - in April 2019, the full sharia penal codes came into force and apply to Muslims and non-Muslims in parallel with present common law codes

Bulgaria

civil law

Burkina Faso

civil law based on the French model and customary law

Burma

mixed legal system of English common law (as introduced in codifications designed for colonial India) and customary law

Burundi

mixed legal system of Belgian civil law and customary law

Cabo Verde

civil law system of Portugal

Cambodia

civil law system (influenced by the UN Transitional Authority in Cambodia) customary law, Communist legal theory, and common law

Cameroon

mixed legal system of English common law, French civil law, and customary law

Canada

common law system except in Quebec, where civil law based on the French civil code prevails

Cayman Islands

English common law and local statutes

Central African Republic

civil law system based on the French model

Chad

mixed legal system of civil and customary law

Chile

civil law system influenced by several West European civil legal systems; judicial review of legislative acts by the Constitutional Tribunal

China

civil law influenced by Soviet and continental European civil law systems; legislature retains power to interpret statutes; note - in March 2017, the National People's Congress passed a new civil code, the General Rules of Civil Law, which became effective the following October

Christmas Island

legal system is under the authority of the governor general of Australia and Australian law

Clipperton Island

the laws of France apply

Cocos (Keeling) Islands

common law based on the Australian model

Colombia

civil law system influenced by the Spanish and French civil codes

Comoros

mixed legal system of Islamic religious law, the French civil code of 1975, and customary law

Congo, Democratic Republic of the

civil law system primarily based on Belgian law, but also customary and tribal law

Congo, Republic of the

mixed legal system of French civil law and customary law

Cook Islands

common law similar to New Zealand common law

Coral Sea Islands

the common law legal system of Australia applies where applicable

Costa Rica

civil law system based on Spanish civil code; judicial review of legislative acts in the Supreme Court

Cote d'Ivoire

civil law system based on the French civil code; judicial review of legislation held in the Constitutional Chamber of the Supreme Court

Croatia

civil law system influenced by legal heritage of Austria-Hungary; note - Croatian law was fully harmonized with the European Community acquis as of the June 2010 completion of EU accession negotiations

Cuba

civil law system based on Spanish civil code

Curacao

based on Dutch civil law

Cyprus

mixed legal system of English common law and civil law with European law supremacy

Czechia

new civil code enacted in 2014, replacing civil code of 1964 - based on former Austro-Hungarian civil codes and socialist theory - and reintroducing former Czech legal terminology

Denmark

civil law; judicial review of legislative acts

Dhekelia

laws applicable to the Cypriot population are, as far as possible, the same as the laws of the Republic of Cyprus; note - the Sovereign Base Area Administration has its own court system to deal with civil and criminal matters

Djibouti

mixed legal system based primarily on the French civil code (as it existed in 1997), Islamic religious law (in matters of family law and successions), and customary law

Dominica

common law based on the English model

Dominican Republic

civil law system based on the French civil code; Criminal Procedures Code modified in 2004 to include important elements of an accusatory system

Ecuador

civil law based on the Chilean civil code with modifications; traditional law in indigenous communities

Egypt

mixed legal system based on Napoleonic civil and penal law, Islamic religious law, and vestiges of colonial-era laws; judicial review of the constitutionality of laws by the Supreme Constitutional Court

El Salvador

civil law system with minor common law influence; judicial review of legislative acts in the Supreme Court

Equatorial Guinea

mixed system of civil and customary law

Eritrea

mixed legal system of civil, customary, and Islamic religious law

Estonia

civil law system

Eswatini

mixed legal system of civil, common, and customary law

Ethiopia

civil law system

European Union

unique supranational law system in which, according to an interpretive declaration of member-state governments appended to the Treaty of Lisbon, "the Treaties and the law adopted by the Union on the basis of the Treaties have primacy over the law of Member States" under conditions laid down in the case law of the Court of Justice; key principles of EU law include fundamental rights as guaranteed by the Charter of Fundamental Rights and as resulting from constitutional traditions common to the EU's 28-member states; EU law is divided into 'primary' and 'secondary' legislation; primary legislation is derived from the consolidated versions of the Treaty on European Union and the Treaty on the Functioning of the European Union and are the basis for all EU action; secondary legislation - which includes directives, regulations, and decisions - is derived from the principles and objectives set out in the treaties

Falkland Islands (Islas Malvinas)

English common law and local statutes

Faroe Islands

the laws of Denmark apply where applicable

Fiji

common law system based on the English model

Finland

civil law system based on the Swedish model

France

civil law; review of administrative but not legislative acts

French Polynesia

the laws of France, where applicable, apply

French Southern and Antarctic Lands

the laws of France, where applicable, apply

Gabon

mixed legal system of French civil law and customary law

Gambia, The

mixed legal system of English common law, Islamic law, and customary law

Georgia

civil law system

Germany

civil law system

Ghana

mixed system of English common law and customary law

Gibraltar

the laws of the UK, where applicable, apply

Greece

civil legal system based on Roman law

Greenland

the laws of Denmark apply where applicable and Greenlandic law applies to other areas

Grenada

common law based on English model

Guam

common law modeled on US system; US federal laws apply

Guatemala

civil law system; judicial review of legislative acts

Guernsey

customary legal system based on Norman customary law; includes elements of the French civil code and English common law

Guinea

civil law system based on the French model

Guinea-Bissau

mixed legal system of civil law, which incorporated Portuguese law at independence and influenced by Economic Community of West African States (ECOWAS), West African Economic and Monetary Union (UEMOA), African Francophone Public Law, and customary law

Guyana

common law system, based on the English model, with some Roman-Dutch civil law influence

Haiti

civil law system strongly influenced by Napoleonic Code

Heard Island and McDonald Islands

the laws of Australia apply where applicable

Holy See (Vatican City)

religious legal system based on canon (religious) law

Honduras

civil law system

Hong Kong

mixed legal system of common law based on the English model and Chinese customary law (in matters of family and land tenure)

Howland Island

the laws of the US apply where applicable

Hungary

civil legal system influenced by the German model

Iceland

civil law system influenced by the Danish model

India

common law system based on the English model; separate personal law codes apply to Muslims, Christians, and Hindus; judicial review of legislative acts

Indonesia

civil law system based on the Roman-Dutch model and influenced by customary law

Iran

religious legal system based on secular and Islamic law

Iraq

mixed legal system of civil and Islamic law

Ireland

common law system based on the English model but substantially modified by customary law; judicial review of legislative acts by Supreme Court

Isle of Man

the laws of the UK apply where applicable and include Manx statutes

Israel

mixed legal system of English common law, British Mandate regulations, and Jewish, Christian, and Muslim religious laws

Italy

civil law system; judicial review of legislation under certain conditions in Constitutional Court

Jamaica

common law system based on the English model

Jan Mayen

the laws of Norway apply where applicable

Japan

civil law system based on German model; system also reflects Anglo-American influence and Japanese traditions; judicial review of legislative acts in the Supreme Court

Jarvis Island

the laws of the US apply where applicable

Jersey

the laws of the UK apply where applicable; includes local statutes

Johnston Atoll

the laws of the US apply where applicable

Jordan

mixed system developed from codes instituted by the Ottoman Empire (based on French law), British common law, and Islamic law

Kazakhstan

civil law system influenced by Roman-Germanic law and by the theory and practice of the Russian Federation

Kenya

mixed legal system of English common law, Islamic law, and customary law; judicial review in the new Supreme Court established by the new constitution

Kingman Reef

the laws of the US apply where applicable

Kiribati

English common law supplemented by customary law

Korea, North

civil law system based on the Prussian model; system influenced by Japanese traditions and Communist legal theory

Korea, South

mixed legal system combining European civil law, Anglo-American law, and Chinese classical thought

Kosovo

civil law system; note - the European Union Rule of Law Mission (EULEX) retained limited executive powers within the Kosovo judiciary for complex cases from 2008 to 2018

Kuwait

mixed legal system consisting of English common law, French civil law, and Islamic sharia law

Kyrgyzstan

civil law system, which includes features of French civil law and Russian Federation laws

Laos

civil law system similar in form to the French system

Latvia

civil law system with traces of socialist legal traditions and practices

Lebanon

mixed legal system of civil law based on the French civil code, Ottoman legal tradition, and religious laws covering personal status, marriage, divorce, and other family relations of the Jewish, Islamic, and Christian communities

Lesotho

mixed legal system of English common law and Roman-Dutch law; judicial review of legislative acts in High Court and Court of Appeal

Liberia

mixed legal system of common law, based on Anglo-American law, and customary law

Libya

Libya's post-revolution legal system is in flux and driven by state and non-state entities

Liechtenstein

civil law system influenced by Swiss, Austrian, and German law

Lithuania

civil law system; legislative acts can be appealed to the Constitutional Court

Luxembourg

civil law system

Macau

civil law system based on the Portuguese model

Madagascar

civil law system based on the old French civil code and customary law in matters of marriage, family, and obligation

Malawi

mixed legal system of English common law and customary law; judicial review of legislative acts in the Supreme Court of Appeal

Malaysia

mixed legal system of English common law, Islamic (sharia) law, and customary law; judicial review of legislative acts in the Federal Court at request of supreme head of the federation

Maldives

Islamic (sharia) legal system with English common law influences, primarily in commercial matters
Mali

civil law system based on the French civil law model and influenced by customary law; judicial review of legislative acts in the Constitutional Court

Malta

mixed legal system of English common law and civil law based on the Roman and Napoleonic civil codes; subject to European Union law

Marshall Islands

mixed legal system of US and English common law, customary law, and local statutes

Mauritania

mixed legal system of Islamic and French civil law

Mauritius

civil legal system based on French civil law with some elements of English common law

Mexico

civil law system with US constitutional law influence; judicial review of legislative acts

Micronesia, Federated States of

mixed legal system of common and customary law

Midway Islands

the laws of the US apply where applicable

Moldova

civil law system with Germanic law influences; Constitutional Court review of legislative acts

Monaco

civil law system influenced by French legal tradition

Mongolia

civil law system influenced by Soviet and Romano-Germanic legal systems; constitution ambiguous on judicial review of legislative acts

Montenegro

civil law

Montserrat

English common law

Morocco

mixed legal system of civil law based on French civil law and Islamic (sharia) law; judicial review of legislative acts by Constitutional Court

Mozambique

mixed legal system of Portuguese civil law and customary law; note - in rural, apply where applicable predominantly Muslim villages with no formal legal system, Islamic law may be applied

Namibia

mixed legal system of uncodified civil law based on Roman-Dutch law and customary law

Nauru

mixed legal system of common law based on the English model and customary law

Navassa Island

the laws of the US apply where applicable

Nepal

English common law and Hindu legal concepts; note - new criminal and civil codes came into effect on 17 August 2018

Netherlands

civil law system based on the French system; constitution does not permit judicial review of acts of the States General

New Caledonia

civil law system based on French civil law

New Zealand

common law system, based on English model, with special legislation and land courts for the Maori

Nicaragua

civil law system; Supreme Court may review administrative acts

Niger

mixed legal system of civil law, based on French civil law, Islamic law, and customary law

Nigeria

mixed legal system of English common law, Islamic law (in 12 northern states), and traditional law

Niue

English common law

Norfolk Island

English common law and the laws of Australia

North Macedonia

civil law system; judicial review of legislative acts

Northern Mariana Islands

the laws of the US apply, except for customs and some aspects of taxation

Norway

mixed legal system of civil, common, and customary law; Supreme Court can advise on legislative acts

Oman

mixed legal system of Anglo-Saxon law and Islamic law

Pakistan

common law system with Islamic law influence

Palau

mixed legal system of civil, common, and customary law

Palmyra Atoll

the laws of the US apply where applicable

Panama

civil law system; judicial review of legislative acts in the Supreme Court of Justice

Papua New Guinea

mixed legal system of English common law and customary law

Paraguay

civil law system with influences from Argentine, Spanish, Roman, and French civil law models;

judicial review of legislative acts in Supreme Court of Justice

Peru

civil law system

Philippines

mixed legal system of civil, common, Islamic (sharia), and customary law

Pitcairn Islands

local island by-laws

Poland

civil law system; judicial review of legislative, administrative, and other governmental acts;

constitutional law rulings of the Constitutional Tribunal are final

Portugal

civil law system; Constitutional Court review of legislative acts

Puerto Rico

civil law system based on the Spanish civil code and within the framework of the US federal system

Qatar

mixed legal system of civil law and Islamic (sharia) law (in family and personal matters)

Romania

civil law system

Russia

civil law system; judicial review of legislative acts

Rwanda

mixed legal system of civil law, based on German and Belgian models, and customary law; judicial

review of legislative acts in the Supreme Court

Saint Barthelemy

French civil law

Saint Helena, Ascension, and Tristan da Cunha

English common law and local statutes

Saint Kitts and Nevis

English common law

Saint Lucia

English common law

Saint Martin

French civil law

Saint Pierre and Miquelon

French civil law

Saint Vincent and the Grenadines

English common law

Samoa

mixed legal system of English common law and customary law; judicial review of legislative acts with respect to fundamental rights of the citizen

San Marino

civil law system with Italian civil law influences

Sao Tome and Principe

mixed legal system of civil law based on the Portuguese model and customary law

Saudi Arabia

Islamic (sharia) legal system with some elements of Egyptian, French, and customary law; note - several secular codes have been introduced; commercial disputes handled by special committees

Senegal

civil law system based on French law; judicial review of legislative acts in Constitutional Court

Serbia

civil law system

Seychelles

mixed legal system of English common law, French civil law, and customary law

Sierra Leone

mixed legal system of English common law and customary law

Singapore

English common law

Sint Maarten

based on Dutch civil law system with some English common law influence

Slovakia

civil law system based on Austro-Hungarian codes; note - legal code modified to comply with the obligations of Organization on Security and Cooperation in Europe

Slovenia

civil law system

Solomon Islands

mixed legal system of English common law and customary law

Somalia

mixed legal system of civil law, Islamic (sharia) law, and customary law (referred to as Xeer)

South Africa

mixed legal system of Roman-Dutch civil law, English common law, and customary law

South Georgia and South Sandwich Islands

the laws of the UK, where applicable, apply

Spain

civil law system with regional variations

Sri Lanka

mixed legal system of Roman-Dutch civil law, English common law, Jaffna Tamil customary law, and Muslim personal law

Sudan

mixed legal system of Islamic law and English common law

Suriname

civil law system influenced by Dutch civil law; note - a new criminal code was enacted in 2017

Svalbard

the laws of Norway where applicable apply; only the laws of Norway made explicitly applicable to Svalbard have effect there; the Svalbard Act and the Svalbard Environmental Protection Act, and certain regulations, apply only to Svalbard; the Spitsbergen Treaty and the Svalbard Treaty grant certain rights to citizens and corporations of signatory nations; as of June 2017, 45 nations had ratified the Svalbard Treaty

Sweden

civil law system influenced by Roman-Germanic law and customary law

Switzerland

civil law system; judicial review of legislative acts, except for federal decrees of a general obligatory character

Syria

mixed legal system of civil and Islamic (sharia) law (for family courts)

Taiwan

civil law system

Tajikistan

civil law system

Tanzania

English common law; judicial review of legislative acts limited to matters of interpretation

Thailand

civil law system with common law influences

Timor-Leste

civil law system based on the Portuguese model; note - penal and civil law codes to replace the Indonesian codes were passed by Parliament and promulgated in 2009 and 2011, respectively
Togo

customary law system

Tokelau

common law system of New Zealand

Tonga

English common law

Trinidad and Tobago

English common law; judicial review of legislative acts in the Supreme Court

Tunisia

mixed legal system of civil law, based on the French civil code and Islamic (sharia) law; some judicial review of legislative acts in the Supreme Court in joint session

Turkey

civil law system based on various European legal systems, notably the Swiss civil code

Turkmenistan

civil law system with Islamic (sharia) law influences

Turks and Caicos Islands

mixed legal system of English common law and civil law

Tuvalu

mixed legal system of English common law and local customary law

Uganda

mixed legal system of English common law and customary law

Ukraine

civil law system; judicial review of legislative acts

United Arab Emirates

mixed legal system of Islamic (sharia) law and civil law

United Kingdom

common law system; has nonbinding judicial review of Acts of Parliament under the Human Rights Act of 1998

United States

common law system based on English common law at the federal level; state legal systems based on common law, except Louisiana, where state law is based on Napoleonic civil code; judicial review of legislative acts

United States Pacific Island Wildlife Refuges

the laws of the US apply where applicable

Uruguay

civil law system based on the Spanish civil code

Uzbekistan

civil law system

Vanuatu

mixed legal system of English common law, French law, and customary law

Venezuela

civil law system based on the Spanish civil code

Vietnam

civil law system; note - the civil code of 2005 reflects a European-style civil law

Virgin Islands

US common law

Wake Island

US common law

Wallis and Futuna

French civil law

World

the legal systems of nearly all countries are generally modeled upon elements of five main types: civil law (including French law, the Napoleonic Code, Roman law, Roman-Dutch law, and Spanish law); common law (including English and US law); customary law; mixed or pluralistic law; and religious law (including Islamic sharia law); an additional type of legal system - international law - governs the conduct of independent nations in their relationships with one another

Yemen

mixed legal system of Islamic (sharia) law, Napoleonic law, English common law, and customary law

Zambia

mixed legal system of English common law and customary law

Zimbabwe

mixed legal system of English common law, Roman-Dutch civil law, and customary law