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England, which was contrary to the policy⁶⁹ of what is now s.44 (2) Family Law Act 1986 .70 However, there is no reason why public policy should prevent recognition of a trans-national talaq where the talaq is pronounced in a third country, at least where the latter recognises such a divorce.

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Caribbean Private International Law is the only indigenous text describing the rules that apply in the 15-member states of the Caribbean Community regarding the regulation of cross-border activities in both commercial and family matters.

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Caribbean private international law (Book, 2014) [WorldCat ...

"The first edition of this text was published in two parts by Caribbean Law Publishers: Elements of private international law (2003) and Private international family law (2005)." -- Acknowledgments, page [vi].

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Most states also exclude it in tort cases e.g. in the UK section 9(5) of the Private International Law (Miscellaneous Provisions) Act 1995. Since 11 January 2009, Regulation (EC) 864/2007 (the Rome II Regulation) on the law applicable to non-contractual obligations has been in force, controlling in a uniform way the rules throughout the European Union.

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International law - Wikipedia

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Private International Law. Subject areas of private international law include matters relating to children and families; dispute resolution (including international arbitration); judicial cooperation (including the recognition and enforcement of foreign judgments); finance and banking; secured transactions; and wills, trusts, and estates.

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It is my pleasure to announce the release of this work aiming at the preparation of a Model Law OHADAC of private international law. The project has been carried out thanks to the cooperation between ACP Legal, based in Guadeloupe (France), and the entity Iprolex, SL, Madrid, financed by European funds from the INTERREG project for actions in the field of harmonization of business law in the Caribbean.

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