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subsidiarity in the international constitutional ordering of private law (2009) 264—271. Id at 92-94. This phenomenon is more prevalent in some legal systems than in others. See Venter Constitutional comparison: Japan, Germany, Canada and South Africa as constitutional states (2000) 191. Mills n 10 above at 269.

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22 E.g., indigenous people in Canada have provided for the rights of nature in their indigenous legal systems for many years; for a comprehensive discussion, see Borrows, ... 30 Venter, F., Constitutional Comparison: Japan, Germany, Canada and South Africa as Constitutional States (Juta, 2000), p.

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