The use of paragraphs in French and English academic writing: Towards a grammar of paragraphs*

ELISABETH LE

Abstract

In this article, differences between French and English academics in the use of paragraphs in the domain of public international law are brought to light. First, the concept of paragraph ('macrostructural basis') in text linguistics is defined formally with relations of coordination, subordination, and super-ordination. Second, a typology of paragraphs is established. Third, after the distribution of paragraphs in the corpora has been examined, it is shown how they combine and what their roles are. Thus the first steps towards a grammar of paragraphs are defined. Furthermore, it appears that English authors tend to build their argumentation within their paragraphs, while French authors use paragraphs to build their argumentation. The explanation for this difference might be cultural.

Keywords: contrastive rhetoric; academic writing; paragraph; macrostructural basis; text linguistics.

The multiplication of academic journals and the growing percentage of those published in English might lead one to consider that the transmission of complex ideas in the international academic world has become not only faster, but also easier. However, academic articles are seldom translated and a number of them are still not written in English. In these cases, it is possible that their authors follow a rhetorical style with which the readers are not familiar. In addition, a considerable number of articles that are written in English are authored by researchers for whom English is a second language. It could then happen that these writers transfer into English a specific rhetorical style to which they are accustomed in their first language. Since differences in rhetorical styles might be an obstacle to scholarly communication, particularly when academics cannot afford to read everything that has been published in

their fields, it is important to analyze how academic rhetorical styles differ from one language to another.

A number of researchers in contrastive rhetoric have investigated the existence of cultural differences in written styles (Connor 1996). In the particular domain of academic writing, most studies have focussed on issues of organizational patterns, linearity, and digressiveness (for a comprehensive review of the literature, see Golebiowski 1998). For example, Clyne (1987) studied linearity, symmetry, hierarchy, and the continuity of information in texts written by English- and German-educated scholars in sociology and linguistics. He suggests that differing degrees of linearity in English and German texts might result from different education systems and varying intellectual styles and attitudes to knowledge and content. In her study of French and German texts that were published in the Proceedings volume from a linguistics conference, Sachtleber (1990) shows how French authors compensate for a higher degree of digressivity by a greater use of text organizers to guide the readers between the different levels of the text. Golebiowski's research (1998) pertains to the structure of introductions to papers in psychology that have been written by Polish scholars in Polish and Anglo-American journals. She shows how authors of English texts explicitly lead their readers by summarizing, telling what is going to follow and how parts are interconnected, whereas writers in Polish help their readers understand the presentation of the topic by providing a broad contextual background.

In this tradition then, the aim of this study is to show the differences in the use of paragraphs by French and English scholars writing in their first language in the domain of public international law. These academic articles are never translated and, because of the nature of the field, have to be widely read by scholars in their second language. Since the general principles of the field on which the selected articles draw are the same internationally, the presentation of information in these articles does not depend on variations of that branch of law in the writers' culture.

In the first part of this article, I define formally the concept of 'paragraph', the pertinence of which has already been emphasized in text linguistics (Padueva 1974; Longacre 1979; Hinds 1979; Le Ny 1985; Dubois and Visser 1985; Mitterand 1985; Heurley 1997), and I explain briefly the methodology that I follow. In the second, I discuss a typology of paragraphs that I use in the third part to compare the use of paragraphs by French and English academics in the development of their argumentation. In the conclusion, I claim that the basis for a broader study of paragraphs has been established, and I suggest that the differences that have been observed between French and English academics might very well be due to their educational backgrounds.

1. Methodology

Heurley (1997) classifies the numerous definitions of the paragraph into two categories: the paragraph as a linguistic unit (orthographic or structural), and the paragraph as a processing unit (reader-centered or writer-centered). He concludes that

an approach that would address simultaneously both sides of the written communication process, that is, an *integrated approach*, would be particularly well-adapted to characterize the status of the paragraph as a functional unit. (Heurley 1997: 189)

Thus he proposes to work with paragraphs, as visual textual units, and with information blocks, as structural/semantic organized text units. However, this approach would be better qualified as 'dual'. A really integrated approach would be based on a unit that takes into account at least some aspects of both sides of the communication process. It is such a unit, the macrostructural basis, that is presented now.

1.1. *The macrostructural basis*

The macrostructural basis is comprised within a standard textual paragraph, a unit defined by indentations, blank spaces and/or extra lines. By dividing a text into standard textual paragraphs, writers give their readers cues as to how to process their texts. Indeed, it has been found that the position and presence of paragraph boundaries affected what ideas were considered important (Stark 1988), particularly in low-knowledge situations (Goldman et al. 1995). However, these experiments also showed that 'readers were not "slaves" to paragraphing cues' (Goldman et al. 1995: 299). This is why standard textual paragraphs can only be the starting point for the definition of a suprasentential unit of analysis. A further distinction is necessary, and it is provided by looking at the relations linking sentences within the paragraph.

First, I describe the relations of coordination, subordination, and superordination; second, I define the boundaries and structure of macrostructural bases; and third, I show how the recursivity of such an analysis allows for the verification of its validity.

1.1.1. *Relations of coordination, subordination, and superordination*
The relations utilized in this study are the relations of expansion in Hobbs's computational model (1983) that have been completed in order to cover every logical possibility. There are thus 21 relations, each belonging to one of the three types: coordination, subordination, or superordination.

The relation between two syntactical sentences is determined in three steps. First, each sentence is divided into three parts: two separate elements (segments), *p* and *a*, and the rest, which is what is said about these two elements. Secondly, it is determined whether the first element *p* in sentence 1 belongs to the same, a smaller or a bigger set than the first element *p'* in sentence 2. Thirdly, the same is done with the second elements of each sentence, *a* and *a'*.

The five sentences within the following paragraph (Clyne 1987: 239) will serve to illustrate one case of each type of relation of coordination, subordination, and superordination.

(1) 1. In view of the importance of international communication between scholars, it is vital for scholars to understand the cultural basis of many discourse patterns.
     2. Differences between English and German discourse are but one small example.
     3. I would recommend that this issue be raised in Languages for Special Purposes courses, for mastery of discourse conventions appears to be one of the prerequisites to power on the international academic scene.
     4. Also, native English speakers need to be confronted, within their graduate courses, with the problem of how to communicate with non-native speakers in an international context.
     5. Above all, it is imperative for the cultural basis of discourse structures to be recognized and for variant patterns to be appreciated and respected.

Relations of coordination.   Sentence 1 contains the element *p*, *discourse* and the element *a*, *cultural basis*. Sentence 3 contains the same *p*, *discourse* and the element *this issue* that we can deduce from our grammatical linguistic knowledge to be the same as *a* in sentence 1. In both sentences, we then have *p(a)*. They are considered to be co-ordinated by elaboration, i.e.,

(2) coordination (elaboration):
     1. discourse (*cultural basis*)
     3. discourse (*this issue*)

Sentence 3 contains the elements *p*, *international scene* and *a*, *Special Purpose courses*. Sentence 4 contains the element *international context* that lexical knowledge tells us to be the same as *p* in sentence 3, and an element *b*, *graduate courses*. Our world knowledge allows us to recognize in *a* and *b* subsets of the set of all courses taken by students. In one sentence we have *p(a)*, and in the other *p(b)*; moreover, there exists

a set Σ, such that a is included in Σ and b is included in Σ. These sentences are considered to be co-ordinated by parallelism.

(3) coordination (parallelism):
  3. international scene (*Special Purposes courses*)
  4. international context (*graduate courses*)

Relation of subordination. Sentence 1 contains the element p, *discourse* and the element A, *many patterns*. Sentence 2 contains the same element p, *discourse* and the element a, *English and German*. We know (and actually if we did not, sentence 2 tells us) that English and German discourse are examples of discourse patterns. In the first sentence, we have $p(A)$ then, and in the second $p(a)$; moreover, a is included in A. The second sentence is considered to be subordinated to the first.

(4) subordination:
  1. discourse (*many patterns*)
  2. discourse (*English and German*)

Relation of superordination. Sentence 2 contains the element p, *discourse* and the element a, *small example*. Sentence 3 contains the element A, *this issue* (= cultural basis), and the same element p. The *small example* of sentence 2 is an example of *this issue* of sentence 3. In the first sentence, we have $p(a)$, and in the second $p(A)$; moreover, a is included in A. The second sentence is considered to be superordinated to the first.

(5) superordination:
  2. discourse (*small example*)
  3. discourse (*this issue* [= cultural basis])

It is also easy to show that sentences 1 and 5 are coordinated by elaboration, as well as sentences 4 and 5. Indeed, we have:

(6) coordination (elaboration):
  a. 1. cultural basis (*discourse*)
      5. cultural basis (*discourse*)
  b. 4. communicate (*to be confronted*)
      5. discourse (*to be recognized, to be appreciated and respected*)

Communication (sentence 4) is expressed through a discourse (which may be of different kinds) (sentence 5), and in the situation created by the analyzed paragraph, for the students to.be confronted to the problem of communication with non-native speakers (sentence 4) means to recognize, to appreciate, and to respect the cultural basis of variant discourse patterns (sentence 5).

The paragraph analyzed in terms of coordination, subordination and superordination has a graphical representation that shows the hierarchical structure of the discourse:
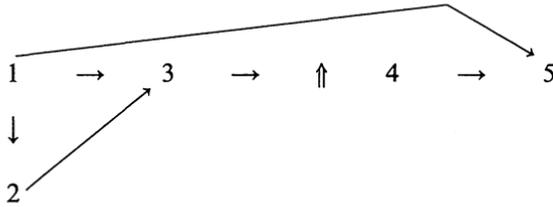
1.1.2.   *Boundaries and structure of macrostructural bases*

A macrostructural basis is a set of sentences in the same standard textual paragraph. It starts with the first sentence at the highest level of generality or abstraction and finishes with the last sentence at the same level (including the sentences that are eventually subordinate to it), unless a relation of parallelism occurs between the sentences at the highest hierarchical level. In that case, this rupture constitutes a starting point for a new macrostructural basis; unless a relation of elaboration dominates this relation of parallelism.

Thus, although a relation of parallelism appears at the highest level of hierarchy of the paragraph analyzed in the previous subsection (between sentences 3 and 4), this paragraph constitutes only one macrostructural basis, because a relation of elaboration coordinates sentences 1 and 5 (and thereby dominates the relation of parallelism between sentences 3 and 4).

A macrostructural basis is composed of a macrotheme and a macrorheme; it also contains a macrostructure. As a basic principle, the macrotheme or thematic sentence of the macrostructural basis is the first sentence at the highest hierarchical level of the macrostructural basis (there are, however, three exceptions to this principle; Le 1996). In graphical representations, it is underlined. The macrorheme comprises all other sentences of the macrostructural basis. The macrostructure or macrostructural sentence(s) of the macrostructural basis is the last sentence at the highest hierarchical level. In graphical representations, it is usually indicated in bold characters (but is marked here by the use of italics).

In example (1), sentence 1 is thus the macrotheme while sentence 5 is the macrostructure.

1.1.3.   *Recursivity of the analysis*

The same type of analysis as described in the previous subsection can be applied recursively at the macrostructural level, i.e., the links between

macrostructures are analyzed in terms of coordination, subordination, and superordination. Within the limits of an author's division (a section of a text composed of standard textual paragraphs and preceded by any distinctive mark—a title, a number, a letter, etc.), a *text division*, composed of macrostructures, is defined with the same rules applied in order to define a macrostructural base within a standard textual paragraph. As in macrostructural bases, and with the help of the same rules, a macro-macrotheme and a macro-macrostructure are found in each text division.

The recursivity of this analysis allows for the verification of its validity. Indeed, all macro-macrothemes and macro-macrostructures, read one after another in the order in which they occur, must constitute a summary of the original text. This summary requires only minor linguistic changes to be a perfectly coherent and linguistically correct text. The content of this summary must correspond to what the reader/analyst would have intuitively said the text is about. Furthermore, it can also be checked with summaries generated and/or intuitively produced by other readers/analysts: without being exactly similar (to account for different interpretations of the same text), they would have to be congruent.

Thus, the macrostructural basis appears as a functional suprasentential unit that combines both writer and reader perspectives. This type of macrostructural analysis has been applied to two corpora of argumentative texts.

1.2. *Description of the corpora*

Two corpora of academic texts were analyzed. Each text is from a different author writing in his/her first language and has been published in either the *Annuaire Français de Droit International* (*AFDI*) from 1966 to 1988, or the *British Yearbook of International Law* (*BYBIL*) from 1966 to 1986. These two academic reviews are of comparable importance in the field of public international law. The first corpus contains four complete articles, two in French and two in English, while the second corpus comprises eight excerpts from articles (chosen in the development of the argumentation), four in French and four in English.

Since this work includes a comparison between French and English texts, it was deemed necessary to respect in the choice of texts the following criteria defined by Purves (1988: 16–17):

1. The settings in which the writing occurs should be as similar as possible.
2. The writing task should be consistently set in its function and cognitive demands as in the specific subject matter.

3. The language (i.e., native or foreign) in which the writers are writing must be defined.
4. The occupation of the writers should be similar or, if not, should be defined and accounted for as a variable.
5. The education of the writers should be similarly defined and described.

Corpus 1
The first corpus contains four complete articles, two in French (F1) and two in English (E1) (see the Appendix). As can be seen in Table 1, the length of these articles varies from 5,000 words to 10,000 words. Although this is a considerable difference, it is assumed to be of no consequence in this study, because an argumentation of the same complexity can be developed in 5,000 or in 10,000 words. Nonetheless, it is the number of sentences, the primary units of analysis, that ought to be taken into account; however, their variation in this corpus (from 197 to 383) should, for the same reason, not influence the results of this study.

Corpus 2
The second corpus contains an excerpt of four articles in French (F2) and four articles in English (E2) (see the Appendix). The analyzed excerpts have been chosen in the development of the argumentation of each article. I excluded all general introductions and conclusions, since they may present particular features. Each excerpt corresponds to a division made by the author in the text and represents more-or-less thirty percent of the whole text. In Table 2, it can be seen that E2-AKE is considerably longer (45 percent); this is due to the fact that a third of this text would have been too short an excerpt (since this text is shorter than the other articles).

Table 1. *Characteristics of corpus 1*

Author	Number of words (approx.)	Number of analyzed words (approx.)	Percentage of analyzed text	Number of analyzed sentences	Number of analyzed MCRB[a]	Number of analyzed DIV[b]
F1-VIG	5,000	5,000	100	197	47	4
F1-VIR	10,000	10,000	100	383	95	24
E1-BOW	9,500	9,500	100	357	93	21
E1-CHA	7,000	7,000	100	303	54	7
Total	31,500	31,500	–	1,240	289	56

[a]Macrostructural bases
[b]Text divisions

Table 2. *Characteristics of corpus 2*

Author	Number of words (approx.)	Number of analyzed words (approx.)	Percentage of analyzed text	Number of analyzed sentences	Number of analyzed MCRB[a]	Number of analyzed DIV[b]
F2-CAD	6,800	2,000	29	59	29	8
F2-PRE	8,200	2,100	26	88	31	3
F2-TAV	9,700	2,500	26	99	30	4
F2-ZOL	7,200	2,300	32	84	11	2
E2-AKE	5,500	2,500	45	108	21	3
E2-BAX	9,500	3,000	32	84	21	1
E2-CRA	9,300	3,000	32	115	17	7
E2-FIT	15,000	4,200	28	119	15	3
Total	71,200	21,600	30	756	175	31

[a]Macrostructural bases
[b]Text divisions

As for E2-FIT, it is much longer in number of words (but not sentences), essentially because this text is also much longer than the other articles. For the same reason as applies to corpus 1, the variation in number of words or sentences should not be of any consequence in this study.

For both corpora, an analysis in terms of coordination, subordination, and superordination was conducted at the sentential and macrostructural levels. The themes and rhemes were determined at the levels of the sentence, the macrostructural basis, and the text division. This allowed for an analysis according to the functional perspective at each of these levels.

2. A typology of paragraphs

The completion of the analysis in terms of coordination, subordination, and superordination at the sentential level for both corpora revealed five types of standard textual paragraphs. Four of them (the single-unit paragraph, the expository paragraph, the explanatory paragraph, and the complex paragraph) correspond to one macrostructural basis; and one (the combined paragraph) regroups two or more macrostructural bases. (A similar typology has been established for text divisions at the macrostructural level; Le 1996.)

2.1. *Single-unit paragraph*

The single-unit paragraph is a macrostructural unit composed of only one (syntactic) sentence. As Table 3 shows, the number of words it contains varies greatly within the same text (from seven to ninety-six words in

Table 3.   *Single-unit paragraph characteristics (corpus 1)*

	F1-VIG	F1-VIR	E1-BOW	E1-CHA
Number of single-unit paragraphs	10	17	14	3
Percentage of single-unit paragraphs	21.27%	17.89%	15.05%	5.55%
Average number of words per single-unit paragraph	44.50	41.52	37.28	28.00
Minimum number of words found in a single-unit paragraph	16	15	7	18
Maximum number of words found in a single-unit paragraph	81	87	96	48

E1-BOW) and between texts (with an average of 28 words in A1-CHA and 44.5 words in F1-VIG). Moreover, it is not found with the same frequency in each text (5.55 percent of the total number of paragraphs in E1-CHA and 21.27 percent in F1-VIG). E1-CHA differs from the other texts in its smaller percentage of single-unit paragraphs (5.5 percent) and its smaller average number of words in single-unit paragraphs (28.00 percent).

Let us now examine four examples of single-unit paragraphs, taken from Bowett's article: 'Reservations to non-restricted multilateral treaties' (*BYBIL* 1976–1977: 67–92; see Appendix). In the first two examples, the single sentence composing a macrostructural basis also forms a standard textual paragraph.

Paragraph 10, shown here as example (7), is composed of the 47th sentence (from the beginning of the text) and contains 48 words. As a paragraph, it introduces the second of seven divisions made by the author in his text, and its content, the distinction between permissible and impermissible (or prohibited) reservations, is developed at a subordinate level in 19 standard textual paragraphs.

(7)   *10.47*   This distinction derives from the will of the Parties in that they may either prohibit certain reservations, expressly or by necessary implication, or expressly authorize certain reservations, or be deemed to have prohibited such reservations as would be incompatible with the whole object and purpose of the treaty.

Paragraph 78 (sentence 334), which is example (8), is part of the conclusion, the seventh division made by the author in his text. It is the fourth of ten propositions formulated as a guide to States in matter of treaty reservations and it contains 96 words. This paragraph, as well as

paragraph 10, shows how the complexity of a syntactical sentence with its semantic richness allows it to play the same role in a text as several syntactically less complex sentences.

(8)   *78.334*   4. Therefore, in relation to reservations to an article to which reservations are allowed, the permissibility of any particular reservation will depend upon its fulfilling certain criteria, namely:
(i) that it is a true reservation;
(ii) that it is a reservation to that article and does not seek to modify the effect of some other article to which reservations are not allowed;
(iii) that it does not seek to modify rules of law which derive from some other treaty or from customary international law;
(iv) that is not compatible with the object and purpose of the treaty.

In the last two examples, the single-unit paragraph is one of the macrostructural bases contained in a standard textual paragraph.

Paragraph 48 (example [9]) contains two macrostructural bases; the first is composed of sentences 208a and 208b, and the second of sentence 209. This last sentence, coordinated by parallelism to 208b corresponds to a single-unit paragraph (paragraph 48–2). It contains 51 words, while 208a and 208b, considered together, contain only 25 words. Both macrostructural bases are commentaries of a statement on a collegiate system by Sir Humphrey Waldock, the Expert Consultant and Rapporteur to the International Law Commission, quoted in paragraph 47.

(9)   §48   208a   →   *208b* ⇑ *209*
48.208a   The last sentence of Sir Humphrey's statement is a telling one,
48.208b   and in the event the majority of the Conference voted against a collegiate system.
48.209   Yet neither Sir Humphrey nor the Conference specifically adverted to the difficult question of whether, given a unilateral determination of incompatibility and therefore impermissibility, it follows that the reserving State is not a Party or, alternatively, that it is a Party and that the reservation alone is regarded as a nullity.

Paragraph 56, shown as example (10), also combines two macro-structural bases, the second being composed of the last sentence, 258. This sentence (paragraph 56–2), containing nine words, is a single-unit

paragraph. It introduces three sections: (*a*) acceptance of the reservation (paragraph 57); (*b*) objection to the reservation but without opposing the entry into force of the treaty (paragraphs 58–61); (*c*) objection to the reservation coupled with an express declaration of intention that the treaty shall not be in force between the 'reserving' and the 'objecting' States (paragraphs 62–64). This sentence (258) appears to have been attached to the preceding, because its brevity would have made it awkward for it to stand alone.

(10) §56   254   →   255   →   256   →   *257* ⇑ *258*

     56.254   However, it is important to understand what is a reservation 'expressly authorized'.

     56.255   Merely to permit reservations to specific articles is not to make such reservations expressly authorized, for the Parties may have no means of knowing what the content of such reservations may be.

     56.256   Express authorization presupposes that the content of the reservation is known by the Parties in advance, so that they can be regarded as having already agreed to it.

     56.257   This point has been illustrated in section 2 above.

     56.258   These cases apart, however, the Parties have three options:

These four examples show that single-unit paragraphs are used as an introduction to a development (§56–2) or to a part in a development (§10), or as a part of a development (§48–2, §78).

2.2. *Expository paragraph*

An expository paragraph is a macrostructural basis that states a position in a strictly linear way. In other words, each of its sentences is coordinated by elaboration to another one. Let us take another look at Bowett's text, by way of example.

Paragraph 9 in Bowett's text comprises four sentences. The last, 46, is coordinated by parallelism to 45, but since it is also coordinated by elaboration to 44, it is part of the same macrostructural basis. This paragraph ends the first division made by the author in his text, on the meaning of a 'reservation'. It states the practical difficulty that may arise when a State considers that a reservation made by another State is in fact an interpretative declaration, or vice versa.

(11) §9   43   →   44   →   *45* ⇑ *46*

    9.43   The practical difficulty which may arise is that either the 'reserving' State or the 'objecting' State may take the view

that the statement is a true reservation and thus that, by reason of the terms of the objection, there is no treaty in force between the two States.

9.44 However, this should not be a practical difficulty where there exists an already agreed and binding disputes settlement procedure, for the principle is well-established that a party may not rely on its unilateral interpretation of the validity of the very treaty which is in issue before a legal tribunal, or upon which the jurisdiction of the tribunal itself is based.

9.45 It will be for the tribunal to determine, first, the nature of the statement, i.e., whether it is a true reservation or an interpretative declaration, and then to conclude what the effect of that might be upon its jurisdiction:

9.46 such questions cannot be predetermined by one of the Parties.

2.3. *Explanatory paragraph*

An explanatory paragraph, in contrast to an expository paragraph, ends with a sentence at a lower level of abstraction or generality than that of the first sentence. In this macrostructural basis, therefore, there must be at least one relation of subordination. The explanatory paragraph 'explains' in the sense that the author puts the discussion on a lower level of abstraction or generality with the subordinate sentences. In example (12), paragraph 9 of Charney's text, 'The persistent objector rule and the development of customary international law' (*BYBIL* 1986: 1–24; see Appendix), sentences 49 to 52 clearly give details on the statement made in sentence 48.

(12) §9   47   →   48
                          ↓   ↘
              49 ⇑ 50   →   51   ⟷   52

9.47 Only D'Amato appears to reject the rule.

9.48 His argument has two parts.

9.49 First, he argues that the persistent objector rule is incompatible with the theory that public international law is not founded upon the specific consent of States to rules of law.

9.50 Secondly, he argues that the authorities cited in support of the persistent objector rule do not support the rule in fact or are limited to situations in which a special, rather than general, rule of customary international law is relevant.

9.51 He maintains that the persistent objector rule is appropriate in the case of a special custom since a custom represents a

derogation from generally applicable legal obligations by a limited group of States.

9.52   To require consent in that limited circumstance would be compatible with the general jurisprudence of public international law.

2.4.   *Complex paragraph*

A complex paragraph is a combination of expository and explanatory paragraphs in which the feature of superordination is sometimes added. Although it can appear under very varied forms, one of them must be singled out: the argumentative paragraph. Some of the characteristics of the other complex paragraphs are also presented.

Argumentative paragraph

The argumentative paragraph constitutes a reasoning complete in itself. It starts with one or a few sentences coordinated by elaboration, continues with subordinate sentence(s) that develop(s) at a lower level than the first sentence(s), and ends with one (or a few) sentence(s) at the same level as the beginning sentence(s) to which it is coordinated by elaboration.

Paragraph 5 of Bowett's text is an example of an argumentative paragraph. It examines the content of the 'reservation' made by the USSR to Article 11(1) of the Vienna Convention on Diplomatic Relations of 1961 (sentence 21) and concludes in sentence 26 ('in short') that it cannot be a 'true' reservation.

(13)   §5   21 → 22   →   26
             ↓   ↗
             23 → 24 → 25

5.21   By way of example, one can take the 'reservation' made by the USSR to Article 11(1) of the Vienna Convention on Diplomatic Relations of 1961:

5.22   it was termed a 'reservation' in contrast to the 'declaration' made concerning Article 48 and 50.

5.23   Yet its operative part was as follows:

5.24   … considers that any difference of opinion regarding the size of a mission should be settled by agreement between the sending State and the receiving State.

5.25   Given that Article 11 allowed the receiving State to limit the size of a mission only in the absence of agreement, Australia

did not regard this 'as modifying any rights or obligations under that paragraph'.

5.26   In short, it was not a true reservation.

Other complex paragraphs may present one (or more) of the following characteristics: head subordination, superordination or double coordination by elaboration resulting in two distinct branches.

Head subordination

In explanatory paragraphs, subordination occurs within or at the end of a macrostructural basis. However, it can also be found at the beginning. Head subordination takes place when the author introduces a general statement by a specific example. For instance, paragraph 21 of Charney's text would be an expository paragraph, if it were not for its first sentence (151), which is subordinate to sentences 152 to 154. Indeed, sentence 151 is a counterexample of the statement made in sentence 152.

(14) $\underline{152} \quad \rightarrow \quad 153 \quad \rightarrow \quad 154$
                       $\nearrow$

§21   151

21.151   Even today, the US continues to maintain that highly migratory species of tuna are exempt from coastal State jurisdiction beyond the territorial sea.

<u>21.152</u>   While the international law may not be completely settled, it appears that the claims of many interested coastal States and the text of the Law of the Sea Convention would support the view that the species of fish are within the coastal State's jurisdiction in the exclusive economic zone.

21.153   Despite the fact that the US would have a persistent objector status, it has been subjected to serious enforcement actions by coastal States.

21.154   Those coastal States appear to be unwilling to treat the US as exempt from the new rule.

Superordination

Every time a relation of superordination occurs in a paragraph and the superordinate sentence is at the highest level of abstraction or generality in the macrostructural basis, this paragraph can be said to be complex. (An explanatory paragraph might contain a relation of superordination if this relation takes place among the subordinate sentences of the macrostructural basis, that is if the superordinate sentence is not at the highest

level of abstraction or generality in the macrostructural basis.) Let us now look at two different cases of superordination in a complex paragraph.

Paragraph 24 of Charney's text provides us with an example of a syllogism. The superordinate sentence 166 is a general statement ('no case' can be opposed to 'none of these cases' and therefore is considered as comprising 'each of the examples given above' and other cases) that applies to sentence 165 and results in sentence 167.

(15)

```
                           166
                            ↓
§24      165   →   167   →   168
```

24.165   In each of the examples given above, the persistent objector rule does not appear to have significantly helped the State or States that have resisted the new developments.

24.166   No case, however, is clear cut.

24.167   In all of the cases that one could identify, it might be argued that the alleged pre-existing law was never law, that the new law is not yet settled, or alternatively, that the persistent objector rule was of assistance in some imperceptible way.

24.168   Such explanations of the examples, however, do not so much support the viability of the rule as demonstrate the very tenuous nature and limited usefulness of the rule itself.

Paragraph 46 of Charney's text shows how an author might conclude a paragraph at a higher level of abstraction or generality. In this instance, 'both of these rules' of which the purpose is determined (sentence 293) includes the persistent objector rule and the rule according to which 'one must examine the views and practice of the States whose interests are particularly affected' (sentence 45.286).

(16)

```
                                                    293
                                                     ↗
§46      288   →   289   →   290   →   291   →   292
```

46.288   If any State will be the persistent objector, it will be the particularly affected State.

46.289   Such a State will have interest particularly at stake in the matter that is the subject of the rule of law under study.

46.290   If it finds that the new rule is contrary to its interests, it will oppose the rule and will work for its rejection.

46.291   As a particularly affected State, it will have leverage in determining the evolution of the applicable rule of law

46.292 and will have the theoretical option of invoking the persistent objector rule.

46.293 Thus both of these rules have one purpose, to force an accommodation of interests in the international community with respect to the evolution of new rules of law.

Double coordination by elaboration resulting in two distinct branches
Double coordination within a macrostructural basis, i.e., when a sentence is coordinated with two other sentences by elaboration or parallelism, happens occasionally, and Bowett's paragraphs 5 (argumentative) and 9 (expository) are examples of this. However, sometimes a double coordination by elaboration results in two distinct branches in the macrostructural basis, as in paragraph 44 of Charney's text. Indeed, two branches can be seen starting after sentence 279, on the one hand sentences 280 and 281, having no link on the other hand with sentences 282 to 285. This type of paragraph is considered complex.

(17)
```
                         ┌─→ 280  →  281
  §44    278   →   279─┤                        ↘
                         └─→ 282  →  283  →  284  ↕  285
```
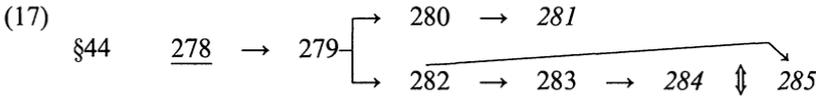
44.278 It appears therefore, that the persistent objector rule, if it really exists, focuses more on the process of law development than on the status of a State under stable international law.

44.279 Its utility, if any, is to provide the State which objects to the evolution of a new rule of law with a tool it may use over the short term in its direct and indirect negotiations with the proponents of a new rule.

44.280 The objecting State is armed with the theoretical right to opt out of the new rule.

44.281 The proponents of the rule are, as a consequence, encouraged to accommodate the objecting State or to utilise greater power to turn the objecting States to their will.

44.282 At the same time, the persistent objector rule permits the objecting State to feel secure that it is not directly threatened, in an overt legal way, by changes in the law which it opposes.

44.283 The legal system thereby appears to be fair and to permit an accommodation of views in the evolution of rules of law.

44.284 It will be the political and social realities of the new status quo that will force the objecting State to conform to the

> new rule of law or the rest of the international community
> to accept on the basis of prescription the dissenter's unique
> status.
>
> *44.285*   It will not be a formal rule of uniform obligation that will
> procure conformity.

The typology of paragraphs presented in the foregoing (single-unit, expository, explanatory, and complex) allows for the classification of all macrostructural bases. These macrostructural bases may or may not correspond to standard textual paragraphs. If they do not, it means that they are combined with another macrostructural basis to form a standard textual paragraph.

2.5.   Combined paragraph

A combined paragraph is a standard textual paragraph composed of two or more macrostructural bases of a single-unit, expository, explanatory, or complex type.

In addition to Bowett's standard textual paragraphs 48 and 56, each of which joins an expository paragraph and a single-unit paragraph, as already discussed (cf. section 2.1), two other common combinations are given as examples here.

Bowett's standard textual paragraph 17 is composed of two macro-structural bases: sentences 73 and 74 forming an expository paragraph on the one hand, and sentences 75 and 76 also forming an expository paragraph on the other.

> (18)   §17   73   →   74 ⇑ 75   →   76
>
> 17.73   This complex 'reservation' is in marked contrast to the
> Venezuelan reservation made on ratification which was in
> the following terms: '... with express reservation in respect
> of Article 6 of the said Convention'.
>
> *17.74*   There can be little doubt of the permissibility, under Article
> 12, of a reservation which excludes Article 6 *in toto.*
>
> 17.75   The position of a complex reservation such as the French
> reservation is by no means so clear
>
> *17.76*   and its permissibility cannot be assumed on the ground that
> it is or purports to be, a reservation to an article to which
> reservations are permitted.

In Charney's text, standard textual paragraph 28 regroups two explanatory paragraphs, the macrostructural basis composed of sentences 177 and 178 and the macrostructural basis composed of sentences 179 to 181.

(19)   §28   *177* ⇕   *179*
                   ↓   ↓ ↘
                  178   180 ⇑ 181
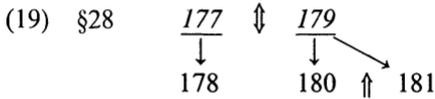
28.*177*   Some authorities seek to avoid this logical difficulty by relying on the doctrine of tacit consent.

28.178   Thus, if a rule is evolving and a State does not object, it is assumed to have consented to the rule.

28.*179*   As others have pointed out, this tacit consent is a mere fictional creation of academicians which has no basis in the realities of States' behaviour.

28.180   The tacit consent rule is not easily reconciled with the generally accepted rule that new States are bound by existing rules of international law to which they had never consented.

28.181   Furthermore, the tacit consent rule does not explain why tacit dissenters and dissenters who make their objections known after the rule has become international law are bound.

Any standard textual paragraph can thus be classified as a single-unit, expository, explanatory, complex, or combined paragraph. This classification, however, is not a goal in itself; it is only a first step towards the constitution of a grammar of paragraphs.

3.   The use of paragraphs in French and English academic writing

If a grammar of paragraphs had been written, it would tell us what a paragraph is and how paragraphs interact with each other. A typology of paragraphs has just been defined. Now, the use of paragraphs in the two corpora of academic writing described above is examined as to their distribution, their combinations, and the role of single-unit and complex paragraphs. It is to be noted that this will be done in terms of percentages. While this type of description is necessarily restricted, it is still indicative of possible general tendencies. At this stage, no statistical test can be validly conducted.

3.1.   *Distribution of paragraphs*

Tables 4 to 6 provide the distribution of types of paragraphs for both corpora, measured in terms of quantity and percentage. The last row indicates the total number of macrostructural bases in each text. This number does not necessarily coincide with the sum of the numbers in the column, but corresponds to the sum of single-unit, expository,

explanatory, or complex paragraphs. Indeed, combined paragraphs regroup two or more macrostructural bases, whose types (single-unit, expository, explanatory, or complex) are already counted. Since each percentage has been rounded up or down, it might happen that their sum, for one text, be slightly more or less than 100.

The distribution of paragraphs in each text of corpus 1 (complete articles) is shown in Table 4. The French texts tend to have more single-unit paragraphs (twenty-one percent for F1-VIG and eighteen percent for F1-VIR) than the English texts (fifteen percent for E1-BOW and six percent for E1-CHA). Moreover, while the percentage of expository paragraphs in English texts is clearly higher (61 percent in E1-BOW and 41 percent in E1-CHA) than it is in French texts (30 percent in F1-VIG and 35 percent in F1-VIR), the contrary is true as far as explanatory texts are concerned (36 percent in F1-VIG and F1-VIR, but 18 percent in E1-BOW and 19 percent in E1-CHA). The percentage of complex paragraphs tends to be rather low everywhere (thirteen percent in F1-VIG, twelve percent in F1-VIR, five percent in E1-BOW), except in F1-CHA, where they account for 35 percent of all paragraphs. As for combined paragraphs, their percentage in each text is similar and approximates ten percent. This is rather remarkable, since it means that about nine out of ten standard textual paragraphs in corpus 1 are macrostructural bases. Another fact well worth noticing is that the single-unit, expository, and explanatory paragraphs (i.e., the three basic types, since the complex paragraph is in fact a sort of combination of expository and explanatory paragraphs) of corpus 1 represent 86 percent of all paragraphs.

Table 5 deals with the French texts (excerpts of articles) in corpus 2. The percentage of single-unit paragraphs varies from 45 percent in F2-CAD to zero in F2-ZOL. The proportion of expository paragraphs is clearly higher (41 percent in F1-CAD, 48 percent in F2-PRE, 43 percent in F2-TAV) than that of explanatory paragraphs (ten percent in F2-CAD, thirteen percent in F2-PRE, seventeen percent in F2-TAV), except in F2-ZOL where it is similar (27 percent). However, in this text, complex paragraphs account for 45 percent of all paragraphs, whereas in the other texts they amount to much less (three percent in F2-CAD, six percent in F2-PRE, twenty percent in F2-TAV). Combined paragraphs may represent as many as a quarter of all standard textual paragraphs (27 percent in F2-TAV) or as few as six percent (F2-PRE).

The distribution of types of paragraphs in the English texts (excerpts) of corpus 2 is given in Table 6. Close to a quarter (24 percent) of all paragraphs in E2-AKE and E2-BAX are single-unit paragraphs, while there are none of these in E2-FIT. In each text, the percentage of expository paragraphs is very high (38 percent in E2-AKE, 48 percent in

Table 4. *Types of paragraphs in corpus 1*

Types of paragraphs	F1-VIG		F1-VIR		E1-BOW		E1-CHA		Total	
	Quantity	percentage	Quantity	Percentage	Quantity	Percentage	Quantity	Percentage	Quantity	Percentage
Single-unit	10	21	17	18	14	15	3	6	44	15
Expository	14	30	33	35	57	61	22	41	126	44
Explanatory	17	36	34	36	17	18	10	19	78	27
Complex	6	13	11	12	5	5	19	35	41	14
Combined	5	11	6	6	9	10	5	9	25	9
Total number of macrostructural bases	47	–	95	–	93	–	54	–	289	–

Table 5. *Types of paragraphs in corpus F2 (French texts)*

Types of paragraphs	F2-CAD		F2-PRE		F21-TAV		F2-ZOL		Total F2	
	Quantity	Percentage	Quantity	Percentage	Quantity	Percentage	Quantity	Percentage	Quantity	Percentage
Single-unit	13	45	10	32	6	20	–	–	29	29
Expository	12	41	15	48	13	43	3	27	43	43
Explanatory	3	10	4	13	5	17	3	27	15	15
Complex	1	3	2	6	6	20	5	45	14	14
Combined	2	7	2	6	8	27	2	18	14	14
Total number of macrostructural bases	29	–	31	–	30	–	11	–	101	–

Table 6. *Types of paragraphs in corpus E2 (English texts)*

Types of paragraphs	E2-AKE		E2-BAX		E2-CRA		E2-FIT		Total E2	
	Quantity	Percentage	Quantity	Percentage	Quantity	Percentage	Quantity	Percentage	Quantity	Percentage
Single-unit	5	24	5	24	2	12	–	–	12	16
Expository	8	38	10	48	7	41	11	73	36	49
Explanatory	1	5	4	19	3	18	2	13	10	14
Complex	7	33	2	10	5	29	2	13	16	22
Combined	4	19	1	5	4	24	3	20	12	16
Total number of macrostructural bases	21	–	21	–	17	–	15	–	74	–

E2-BAX, 41 percent in E2-CRA), especially in E2-FIT (73 percent), while explanatory paragraphs count for less than two out of ten paragraphs throughout the corpus (five percent in E2-AKE, nineteen percent in E2-BAX, eighteen percent in E2-CRA, thirteen percent in E2-FIT). Compared to explanatory paragraphs, the percentage of complex paragraphs is rather high (thirty-three percent for E2-AKE, ten percent in E2-BAX, twenty-nine percent E2-CRA, thirteen percent in E2-FIT). Combined paragraphs represent almost a quarter (24 percent) of all standard textual paragraphs in E2-CRA, but less in the other texts (nineteen percent in E2-AKE, five percent in E2-BAX, twenty percent in E2-FIT).

Finally, Table 7 allows us to compare the distribution of types of paragraphs between each corpus. First, from the percentage of combined paragraphs for all corpora, it can be concluded that as many as eight out of ten standard textual paragraphs are macrostructural bases. Second, whatever corpus is considered, the three basic types of paragraphs (i.e., single-unit, expository, and explanatory) form the large bulk of all paragraphs (88 percent in F1 and 84 percent in E1, that is 86 percent in corpus 1; 86 percent in F2 and 78 percent in E2, that is 83 percent in corpus 2). Third, single-unit paragraphs are more common in French texts (19 percent in F1 and 29 percent in F2) than in English (12 percent in E1 and 16 percent in E2), while complex paragraphs are more often found in English texts (16 percent in E1 and 22 percent in E2) than in French (11 percent in F1 and 14 percent in F2). And fourth, French texts contain fewer expository paragraphs (33 percent in F1 and 43 percent in F2) than do English texts (54 percent in E1 and 49 percent in E2), but more explanatory paragraphs (36 percent in F1 and 15 percent in F2, opposed to 18 percent in E1 and 14 percent in E2).

The second conclusion that is drawn from Table 7 underlines the relatively simple structure of macrostructural bases. The first and third conclusions are explored below, while the fourth, concerning textual linearity, will be considered at another time.

Table 7. *Types of paragraphs in corpora 1 and 2*

Types of paragraph	Totals (in percent)					
	corpus F1	corpus E1	corpus 1	corpus F2	corpus E2	corpus 2
Single-unit	19	12	15	29	16	23
Expository	33	54	44	43	49	45
Explanatory	36	18	27	15	14	14
Complex	11	16	14	14	22	17
Combined	8	10	9	14	16	15

3.2. Combinations of paragraphs

About two standard textual paragraphs out of ten are combined paragraphs. Why are they combined and what do they combine? These are the two questions now being addressed.

It might be supposed that the longer a standard textual paragraph is, the more probable it is that it is combined. However, such a correlation does not exist, as it is shown in Tables 8 and 9, which provide the mean number of sentences per standard textual paragraph (single-unit paragraphs excluded) and the percentage of combined paragraphs for each text of corpora 1 and 2. This might be explained by the types of paragraphs combined.

Tables 10 to 13 inform us about the types of combined paragraphs in both corpora. Three revealing observations can be made. First of all, at least half of all combined paragraphs (64 percent in corpus F1, 50 percent in E1, 50 percent in corpus F2, 58 percent in corpus E2) are comprised of one or more single-unit macrostructural bases (this explains why shorter standard textual paragraphs are not necessarily less likely to combine two or more macrostructural bases). Second, it appears that the other combined paragraphs are mostly of the type expository/expository (64 percent in corpus 1 and 83 percent in corpus 2). Third, the variety of combinations is limited: I found only four categories (single-unit/any other type, expository/expository, explanatory/explanatory,

Table 8. *Combined paragraphs in corpus 1*

	F1-VIG	F1-VIR	E1-BOW	E1-CHA
Mean number of sentences per STP[a]	5.05	4.69	4.34	6.12
Percentage of combined paragraphs	11	6	10	9

[a]Standard textual paragraph

Table 9. *Combined paragraphs in corpus 2*

	F2-CAD	F2-PRE	F2-TAV	F2-ZOL	E2-AKE	E2-BAX	E2-CRA	E2-FIT
Mean number of sentences per STP[a]	3.00	3.68	5.15	9.33	7.20	5.26	8.84	11.90
Percentage of combined paragraphs	7	6	27	18	19	5	24	20

[a]Standard textual paragraph

Table 10.   *Types of combined paragraphs in corpus 1*

	F1-VIG[a]	F1-VIR[a]	E1-BOW[a]	E1-CHA[a]	Total Quantity	Percentage
Single-unit + single-unit	–	2	–	–	2 ⎫	
Single-unit + expository	–	3	5	1	9 ⎪	56
Single-unit + explanatory	1	–	–	–	1 ⎬	
Single-unit + complex	1	–	–	1	2 ⎭	
Expository + expository	1	–	4	2	7	28
Explanatory + explanatory	2	–	–	1	3	12
Expository + complex	–	1	–	–	1	4
Total	5	6	9	5	25	

[a]Figures show number (quantity) of paragraphs

Table 11.   *Types of combined paragraphs in corpus F2 (French excerpts)*

	F2-CAD[a]	F2-PRE[a]	F2-TAV[a]	F2-ZOL[a]	Total Quantity	Percentage
Single-unit + single-unit	1	–	2	–	3 ⎫	
Single-unit + expository	–	1	–	–	1 ⎪	50
Single-unit + explanatory	–	–	1	–	1 ⎬	
Single-unit + complex	–	1	1	–	2 ⎭	
Expository + expository	1	–	4	–	5	36
Explanatory + explanatory	–	–	–	–	–	–
Expository + complex	–	–	–	2	2	14
Total	2	2	8	2	14	

[a]Figures show number (quantity) of paragraphs

expository/complex), of which the first two account for 88 percent of all combined paragraphs in both corpora.

Sometimes, more than two macrostructural bases are combined to form a standard textual paragraph. It is, however, rather rare: only four cases (eight percent of all combined paragraphs) when both corpora are considered together. The following combinations have been found: single-unit/single-unit/single-unit (E2-AKE), expository/single-unit/expository (E2-AKE), expository/expository/explanatory (E2-FIT), expository/ single-unit within expository (E2-FIT). In this last case, the single-unit macrostructural base is inside the second expository 'paragraph'.

This study of combined paragraphs clearly shows that authors do not combine macrostructural bases in the same standard textual paragraph

Table 12. *Types of combined paragraphs in corpus E2 (English excerpts)*

	E2-AKE[a]	E2-BAX[a]	E2-CRA[a]	E2-FIT[a]	Total Quantity	Percentage
Single-unit + single-unit	1	–	–	–	1 ⎫	
Single-unit + expository	2	–	–	2	2 ⎬ 58	
Single-unit + explanatory	–	–	1	–	1 ⎪	
Single-unit + complex	–	–	1	–	1 ⎭	
Expository + expository	1	1	2	1	5	42
Explanatory + explanatory	–	–	–	–	–	–
Total	4	1	4	3	12	

[a]Figures show number (quantity) of paragraphs

Table 13. *Types of combined paragraphs in corpora 1 and 2*

	F1[a]	E1[a]	F2[a]	E2[a]	Total Quantity	Percentage
Single-unit + single-unit	2	–	3	1	6 ⎫	
Single-unit + expository	3	6	1	4	14 ⎬ 55	
Single-unit + explanatory	1	–	1	1	3 ⎪	
Single-unit + complex	1	1	2	1	5 ⎭	
Expository + expository	1	6	5	5	17	33
Explanatory + explanatory	2	1	–	–	3	6
Expository + complex	1	–	2	–	3	6
Total	11	14	14	12	51	

[a]Figures show number (quantity) of paragraphs

randomly. Rather, it seems that they follow unwritten rules in composing their standard textual paragraphs. A closer examination of single-unit paragraphs and their roles might reveal some of these rules.

3.3. The roles of single-unit and complex paragraphs in argumentative texts

Single-unit paragraphs perform certain functions in a text, and their use, when contrasted with that of complex paragraphs, marks a notable difference between French and English argumentative texts.

3.3.1. Functions of single-unit paragraphs

A study of single-unit paragraphs reveals that they fulfill the following functions: introduction, announcement of the plan of development, the

presentation of a complete part of the development, transition from one part of the development to another, or conclusion. Let us notice that each of these functions refers to the structure of the argumentation in the discourse; therefore, the more detailed the structure of the text is through its segmentation into sections and subsections, the more likely it is to contain single-unit paragraphs. These single-unit paragraphs may appear alone, i.e., as standard textual paragraphs, or combined with another macrostructural basis within a standard textual paragraph. They will be combined when the author deems them too short to constitute a standard textual paragraph by themselves, or when the preceding or following macrostructural basis appears too short to constitute a standard textual paragraph on its own. In Bowett's text (cf. section 2.1), for example, paragraph §56–2, composed of sentence 258 (nine words), is an introduction to the following paragraphs and is joined to paragraph §56–1, composed of sentences 254 to 257; moreover, paragraph §48–2 composed of sentence 209 (51 words) forms a complete part of the development of an argument and is joined to §48–1, composed of two sentences (208a and 208b) and forming another part of the same development, but comprising only 25 words. Table 14 shows that, in the French texts, considerably more single-unit paragraphs appear alone than in combination (67 percent alone vs. 33 percent combined in F1, and 76 percent alone vs. 24 percent combined in F2), and that in both corpora the French texts contain more single-unit paragraphs appearing alone than the English texts (67 percent in F1 vs. 59 percent in E1, and 76 percent in F2 vs. 42 percent in E2).

This last remark leads us directly to the comparison of French and English argumentative texts in their use of single-unit versus complex paragraphs.

3.3.2.   *Single-unit versus complex paragraphs*

In Table 7 (cf. section 3.1), we have seen that the greater number of single-unit paragraphs in the French texts (19 percent in F1 vs. 12 percent in E1; 29 percent in F2 vs. 16 percent in E2) and the greater number of complex paragraphs in the English texts (16 percent in E1 vs. 11 percent in F1; 22 percent in E2 vs. 14 percent in F2) constitutes one of the major differences between them. We have also seen that single-unit paragraphs are used to underline the structure of the argumentation in the text. Thus, the argumentative structure of the French texts is typographically more apparent through its segmentation into macrostructural bases than that of the English texts. Moreover, since most single-unit paragraphs in the French texts appear alone and since the French texts contain more single-unit paragraphs appearing alone than do the English texts (Table 14),

Table 14. *Single-unit paragraphs in corpora 1 and 2*

Single-unit paragraphs	F1		E1		F2		E2		Total	
	Quantity	Percentage	Quantity	Percentage	Quantity	Percentage	Quantity	Percentage	Quantity	Percentage
Alone	18	67	10	59	22	76	5	42	55	65
Combined	9	33	7	41	7	24	7	58	30	35
Total	27	–	17	–	29	–	12	–	85	–

we can also conclude that the argumentative structure of the French texts is more apparent through its segmentation into standard textual paragraphs than that of the English texts. It should also be added that, if French paragraphs are less likely to contain a complete argumentation, they seem to explain more than their English counterparts (36 percent explanatory paragraphs in F1 vs. 18 percent in E1; 15 percent explanatory paragraphs in F2 vs. 14 percent in E2). Thus, the argumentation in the French texts would have to be constructed primarily through the use of paragraphs. In conclusion, it can be said that while English authors tend to present their argumentation within standard textual paragraphs (complex paragraphs), French authors use standard textual paragraphs (and among them, single-unit paragraphs) to build their argumentation.

The first eight paragraphs of the third section of Cadoux's text (F2-CAD) and paragraph 8 of Akehurst's text (E2-AKE) will illustrate this important difference in the handling of standard textual paragraphs by French and English authors.

The excerpt from Cadoux's text contains six single-unit paragraphs: two (paragraphs 1.1 and 4.4) serve as introductions, two announce the plan to be followed in the development (paragraphs 2.2 and 3.3), one constitutes a complete part of a development (paragraph 6.8) and one concludes a section of it (paragraph 8.13).

(20)   (French example: Cadoux's text, paragraphs 1 to 8)
III La levée des sanctions et la fin de la 'question de la Rhodésie du sud'
a.   (Introduction to section III)
<u>1.1</u>   Dans l'histoire de l'Organisation Internationale l'affaire rhodésienne restera un cas exemplaire, si l'on ose dire, dans la mesure où elle a été l'occasion de la première application du chapitre VII de la Charte en matière de sanctions obligatoires.
b.   (Plan of section III)
<u>2.2</u>   Au moment où disparaît cette procédure de coercition internationale, il convient d'évoquer, sans faire de bilan détaillé, les principaux aspects qui ont caractérisé la mise en oeuvre et l'application des sanctions, et qui conditionnaient nécessairement la décision et le moment de leur levée.

[A]   *L'expérience des sanctions à l'encontre de la Rhodésie*
c.   (Plan of subsection [A])
<u>3.3</u>   Le système des sanctions rhodésiennes s'est organisé pendant treize ans autour de trois pôles—Grande-Bretagne, instances de L'ONU et États tiers—dont les

interrelations plus ou moins discontinues ont abouti à un fonctionnement estimé, selon les opinions, soit tout à fait médiocres soit relativement satisfaisant.

d. (Introduction to 1°)

4.4 1°) <u>*Le rôle initial et actif de la Grande-Bretagne dans la proposition des sanctions*</u> a été l'élément moteur tout au long de la procédure, quelles que soient les critiques adressées aux gouvernements britanniques successifs par les États 'radicaux'.

e. (First subdivision of 1°)

<u>5.5</u> Dans un premier temps (nov. 1965–déc. 1966) elle veut seulement que le Conseil de Sécurité, réuni à sa demande, appuie son action et 'son' plan de sanctions économiques voté par le Parlement le 16 novembre 1965 (*Southern Rhodesia Act 1965*).

5.6 mais n'en sollicite pas la force exécutoire qui résulterait du déclenchement des articles 39 et 41.

5.7 A plus forte raison exclut-elle toute idée de recours à des sanctions militaires sur la base de l'article 42.

f. (Second subdivision of 1°)

<u>*6.8*</u> C'est seulement lorsque l'entêtement du régime rhodésien, qui dispose de solides appuis extérieurs à cette date, révèle l'échec d'une politique volontaire de sanctions (en matière pétrolière surtout) que le gouvernment britannique se résout, en tant que puissance administrante responsable, à demander au Conseil de Sécurité—qui pour sa part a constaté dans l'état de la situation une 'menace pour la paix'—des sanctions obligatoires.

g. (Third subdivision of 1°)

<u>7.9</u> Dès lors, Londres renouvellera chaque année la section 2 du *Southern Rhodesia Act* jusqu'en novembre 1979 tout en refusant systématiquement des sanctions militaires.

7.10 On a souvent, à l'étranger, critiqué 'l'ambiguïté' de la politique britannique au début du conflit, puis son 'manque d'énergie' par la suite.

7.11 Critique un peu trop facile à notre avis.

7.12 Placée elle-même au carrefour de pressions multiples et d'intérêts divergents—dont la discussion du *rapport Bingham* à la Chambre des Communes en novembre 1978 a mis en relief la complexité—la Grande-Bretagne a tenu constamment à donner sa pleine signification à sa responsabilité de puissance administrante, c'est-à-dire à

déterminer le degré de contrainte susceptible d'être exercé sur la Rhodésie, sans se laisser déborder par des exigences extérieures estimées par elle irréalistes ou dangereuses en ce qui concerne tant le contenu des sanctions que le montant de leur déclenchement.

   h. (Conclusion of 1°)

     8.13 C'est cette même attitude de libre décision qui lui dictera sa conduite pour la levée des sanctions.

Paragraph 8 of Akehurst's text is a particularly complex paragraph, as can be seen in the following. These 19 sentences (six more than in Cadoux's excerpt) present the following divisions: announcement of the plan to be followed (8.43), first subdivision of the first part of the development (8.44 to 8.47), second subdivision of the first part of the development (8.48 to 8.51), first subdivision of the second part of the development (8.52 to 8.55), second subdivision of the second part of the development (8.56 to 8.60), and the conclusion (8.61) (see Figure 1).

(21) (English example: Akehurst's text, paragraph 8)

    a. (Plan of paragraph 8)

      8.43 Paragraph 2(a), on the other hand, was criticized by the Netherlands and United States Governments.

    b. (First part of paragraph 8—first subdivision)

      8.44 The Netherlands Government pointed out that the Commission's commentary on Article 42(2) of its 1963 draft stated:

      8.45   It was necessary to visualize two possible situations:

      8.46   (a) an individual party *affected by the breach* might react alone;

      8.47   or (b) the other parties to the treaty might join together in reacting to the breach.
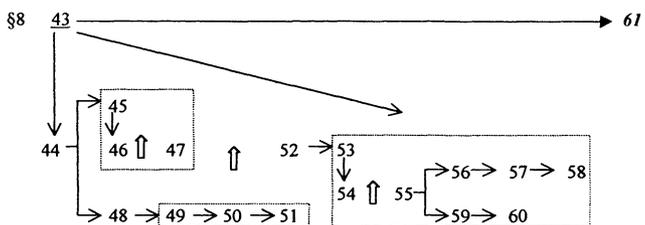

Figure 1.

c. (First part of the paragraph 8—second subdivision)
    8.48   The Netherlands Government commented:
    8.49   ... the Commission's intention, which is clear from ... its commentary, is not quite realized in paragraph 2(a) of the above article ...
    8.50   Paragraph 2(a) could be clarified by modifying the texts ... [to read]:
    8.51   'Any other party, whose right and obligations are adversely affected by the breach ...'
d. (Second part of paragraph 8—first subdivision)
    8.52   Similarly, the United States Government said:
    8.53   The paragraph [i.e., paragraph 2 of Article 42] seems to a certain extent to ignore the differing varieties of multilateral treaties.
    8.54   Paragraph 2 could well be applied to law-making treaties on such matters as disarmament, where observance by all the parties is essential to the treaty's effectiveness.
    8.55   But we question whether a multilateral treaty such as the Vienna Convention on Consular Relations—which is essentially bilateral in its application—should be subjected to the provisions of paragraph 2 as it is now worded.
e. (Second part of paragraph 8—second subdivision)
    8.56   Let us take an example.
    8.57   If a party A refuses to accord to party B the rights set forth in the Consular Conventions, should parties X, Y and Z—in addition to party B (the injured party)—have the right to treat the Convention as suspended or no longer in force between themselves and party A? ...
    8.58   [In that case] article 42 could have an undesirable effect.
    8.59   Termination or suspension in the case of a multilateral treaty should follow the rule applicable to bilateral treaties.
    8.60   That is, an injured party should not be require to continue to accord rights illegally denied to it by the offending party.
f. (Conclusion of paragraph 8)
    8.61   The United States Government therefore suggested the same amendment as the Netherlands Government had suggested.

4. Conclusion

In this study, I have analyzed two corpora of French and English academic writing in terms of coordination, subordination, and superordination at the sentential level. The macrostructural analysis that I have conducted has revealed that the composition of standard textual paragraphs is not a matter of chance, but rather the product of the application of implicit unwritten rules. Indeed, eight out of ten standard textual paragraphs fall within one of the four types defined (single-unit, expository, explanatory, and complex); one out of ten is a combination of a single unit with another type; and the remaining one of the ten is—the majority (74 percent) of the time—a combination of two expository paragraphs. Furthermore, I have shown that, first, the choice of type of paragraphs used in discourse has repercussions on the visual organization of the argumentation, and second, French and English scholars do not seem to share the same strategy in their use of paragraphs. Although these results represent the first steps towards a grammar of paragraphs, much more needs to be done in order to uncover what textuality is. One way to continue developing this grammar would be to look for a possible correlation between the types of paragraphs and their links in terms of coordination, subordination, and superordination. A further question would be to pursue the existence of specific rules in the grammar of paragraphs for different types of texts.

One might wonder why the French and English scholars differ in their use of paragraphs. They have all attained the same academic level and they all work in the same domain. Although each of them wrote on a different topic pertaining to the general principles of their field, their argumentation presents a similar level of complexity. It seems that the only major difference between them is where they were educated, i.e., France for the French authors and various places in the Anglo-Saxon world for those writing in English. Thus, one might suppose that the distribution of information in their papers has been influenced by cultural factors. Which are these, and why? Those are questions that another study would have to answer.

Appendix

First corpus

F1-VIG: Vignes, Daniel (1972). Une notion ambiguë: La mise en application provisoire des traités. *Annuaire Français de Droit International* 181–199.

F1-VIR: Virally, Michel (1966). Réflexions sur le *jus cogens*. *Annuaire Français de Droit International* 5–29.

E1-BOW: Bowett, D. W. (1976–1977). Reservations to non-restricted multilateral treaties. *British Yearbook of International Law* 67–92.

E1-CHA: Charney, Jonathan I. (1986). The persistent objector rule and the development of customary international law. *British Yearbook of International Law* 1–24.

Second corpus

F2-CAD: Cadoux, Charles. (1980). Naissance d'une nation: Le Zimbabwe. *Annuaire Français de Droit International* 9–29.
Excerpt analyzed: section III ('La levée des sanctions et la fin de la "question de la Rhodésie du sud" '), pp. 22–29.

F2-PRE: Prevost, Jean-François. (1975). Observations sur la nature juridique de l'Acte final de la Conférence sur la Sécurité et la Coopération en Europe. *Annuaire Français de Droit International* 129–153.
Excerpt analyzed: section II, 1 and 2 ('Un acte d'une portée originale. 1. Une déclaration. 2. Un programme'), pp. 146–153.

F2-TAV: Tavernier, Paul. (1984). La guerre du Golfe: Quelques aspects de l'application du droit des conflits armés et du droit humanitaire. *Annuaire Français de Droit International* 43–64.
Excerpt analyzed: section I A ('La liberté de navigation et le problème de la pollution dans le Golfe'), pp. 45–51.

F2-ZOL: Zoller, Élisabeth. (1988). Sécurité nationale et diplomatie multilatérate—L'expérience des États-Unis comme État hôte de l'Organisation des Nations Unies. *Annuaire Français de Droit International* 109–129.
Excerpt analyzed: section I ('Les privilèges nécessaires de l'organisation'), pp. 112–117.

E2-AKE: Akehurst, Michael. (1970). Reprisals by Third States. *British Yearbook of International Law* 1–16.
Excerpt analyzed: 'termination or suspension of treaties as a result of their breach, pp. 6–12.

E2-BAX: Baxter, R. R. (1965–1966). Multilateral treaties as evidence of customary international law. *British Yearbook of International Law* 275–300.
Excerpt analyzed: section III ('Codification treaties'), pp. 286–293.

E2-CRA: Crawford, James. (1979). The legal effect of automatic reservations to the jurisdiction of the international court. *British Yearbook of International Law* 63–86.
Excerpt analyzed: section 3 (3) ('Automatic reservations and "applicable principles of law" for inconsistencey'), pp. 75–83.

E2-FIT: Sir Fitzmaurice, Gerald. (1980). The problem of the 'non-appearing' defendant government. *British Yearbook of International Law* 89–122.
Excerpt analyzed: section IV ('The court'), pp. 106–115.

Note

References

Clyne, Michael (1987). Cultural differences in the organization of academic texts. *Journal of Pragmatics* 11: 211–247.

Connor, Ulla (1996). *Contrastive Rhetoric. Cross-cultural Aspects of Second-Language Writing*. Cambridge: Cambridge University Press.

Dubois, Danièle and Visser, Willemien (1985). La réalité psychologique du paragraphe. In *La Notion de Paragraphe*, Roger Laufer (ed.), 109–119. Paris: Éditions du Centre National de la Recherche Scientifique.

Goldman, Susan R., Saul, Elizabeth U., and Coté, Nathalie (1995). Paragraphing, reader, and task effects on discourse comprehension. *Discourse Processes* 20: 273–305.

Golebiowski, Zofia (1998). Rhetorical approaches to scientific writing: An English–Polish contrastive study. *Text* 18 (1): 67–102.

Heurley, Laurent (1997). Processing units in written texts: Paragraphs or information blocks? In *Processing Interclausal Relationships—Studies in the Production and Comprehension of Text*, Jean Costermans and Michel Fayol (eds.), 179–200. Mahwah (NJ): Lawrence Erlbaum.

Hinds, John (1979). Organizational Patterns in Discourse. *Syntax and Semantics* 11: 135–157.

Hobbs, J. R. (1983). Why is discourse coherent? In *Coherence in Natural-Language Texts*, Fritz Neubauer (ed.), 29–70. Hamburg: Helmut Buske.

Le, Elisabeth (1996). Structure discursive comparée d'écrits argumentatifs en français et en anglais—De leur linéarité. Unpublished Ph.D. Dissertation, Université de Montréal, Montréal.

Le Ny, Jean-François (1985). Texte, structure mentale, paragraphe. In *La notion de paragraphe*, Roger Laufer (ed.), 129–136. Paris: Éditions du Centre National de la Recherche Scientifique.

Longacre, Ronald E. (1979). The Paragraph as a grammatical unit. In *Discourse and Syntax*, Talmy Givon (ed.), 115–133. New York: Academic Press.

Mitterand, Henri (1985). Le paragraphe est-il une unité linguistique? In *La notion de paragraphe*, Roger Laufer (ed.), 85–95. Paris: Éditions du Centre National de la Recherche Scientifique.

Padučeva, Elena V. (1974). On the paragraph structure. *Linguistics* 131: 49–58.

Purves, Alan C. (1988). *Writing Across Languages and Cultures—Issues in Contrastive Rhetoric*. Beverly Hills (CA): Sage.

Sachtleber, Susanne (1990). Linearität vs. Digressivität—Wissenschaftliche Texte in Zweisprachigen Vergleich. *Folia Linguistica* XXIV (1–2): 105–122.

Stark, Heather A. (1988). What do paragraph markings do? *Discourse Processes* 11: 275–303.

Elisabeth Le has a D.E.A. in Public International Law from the University of Paris II, and a Ph.D. in Linguistics from the University of Montreal. She is Assistant Professor in the Department of Modern Languages and Cultural Studies of the University of Alberta.