

## Agnieszka Szpak

Nicolaus Copernicus University (Poland)

ORCID: 0000-0001-7601-1230

e-mail: dianora@friend.pl

## Joanna Modrzyńska

Nicolaus Copernicus University (Poland)

ORCID: 0000-0002-5409-6787

e-mail: joanna.modrzyńska@umk.pl

# Cities, Transnational Law, and COVID-19

**Abstract:** This paper aims to point to the transition from international law to transnational law that, on the one hand, is caused, and on the other, is strengthened by the growing role of cities in the fight against COVID-19. Various interactions between cities and other international actors give rise to new trends and challenges on the international plane. One of such terms, transnational law, refers to developments beyond the nation-state and includes “all law which regulates actions or events that transcend national frontiers”. It is characterized by a plurality of overlapping normative systems and a growing role of new actors in the international arena, which are cities. The authors give examples of cities bypassing or complementing states with special emphasis on European cities (Polish including) as well as of cities’ transnational cooperation to fight COVID-19 pandemic, filling the gaps in inter-governmental multilateral cooperation.

**Keywords:** *cities, COVID-19, transnational law, international law, international relations, global law, bypass*

## Introduction

When the whole international community faces a threat connected with the COVID-19 pandemic, it is worth remembering that actors other than states have an important role in fighting this threat. Without a doubt, cities are such actors. While it is the prerogative of the central government to decide what restrictions are introduced nationwide and what stimulus packages are offered to boost the country’s economy, the actual implementation of preventative measures and management of the crisis on a daily basis as well as providing leadership and the guidance on the path toward the ‘new normal’ falls ultimately on the

shoulders of city authorities (Rudakowska & Simon, n.d., p. 2). Moreover, sometimes states' response may be – to call it mildly – irrational or illogical. For example, when faced with the hitherto unprecedented COVID-19 pandemic crisis, the US government announced its decision to leave the World Health Organization. Not heeding the international appeals to reconsider the effects of such a move, President Trump withdrew his country from the WHO and announced that funds would be redirected elsewhere. At the time when most countries called for joining the international forces to combat the threat, the US blamed China for creating this strain, which was visible even in the linguistic choice of labeling the pathogen as the “Chinese virus” or “Wuhan virus” in official communications (BBC, 2020).

We are currently witnessing the worldwide acceleration of the urbanization process. The urban areas of today are home to 55% of the world population. Due to the urbanization and the predicted increase of the world population in general, during the next 30 years, this number is expected to rise to 68%, which amounts to an additional 2.5 billion urban dwellers. According to projections, 90% of this growth will occur in Asian and African cities (UN, n.d.). With the majority of the Earth's population living and working in urban environments, cities are increasingly recognized as the arena where major challenges of a social and environmental kind must be dealt with. With the increase in population, the demand for water, energy-, health- and transport-related services has also grown, straining the capabilities and resources of many cities and forcing local authorities to struggle with the unenviable task of providing for those needs (International Urban Cooperation, online).

Cities are certainly some of the most complex organizational forms humans have developed over the last ten thousand years. They have always been the cauldron from which any innovative social, cultural, political, or organizational solutions emerged. On the other hand, if outbreaks of infectious diseases are considered, the perception of cities is ambiguous. They can compound the problem as crucial nodes in the global economy (Sassen, 2002) and places where the largest numbers of people come into daily contact with each other, thus creating the potential for intensified transmission of pathogens – a considerable risk since currently more than a half of the Earth's population (approximately 4 billion people) is concentrated in cities (Muggah & Katz, 2020). Yet, as will be demonstrated in the essay, cities are also part of the solution and show leadership where their nation-states fail.

While states lack strength or political will to deal with such global-level challenges as economic globalization, climate change, or the COVID-19 pandemic, cities in such cases can and very often do act efficiently, without many constraints that restrict the actions of states – it is cities that have enough economic, intellectual, and cultural potential to face such threats. As Duncan A. French (2004, pp. 61–62) points out, we can observe the decline of traditional concepts of sovereignty. Westphalian principles are increasingly contested by non-state actors, such as cities and transnational city networks. States' political, socio-economic, and even military power is dispersing more widely, no longer a prerogative of state governments. The emergence of new governmental, corporate, or private networks and associations is becoming increasingly characteristic of international relations or international

order. It can be seen as the nascence of a global civil society in which the ultimate unit of law is the individual, protected and provided with opportunities to find active expression. Almost a century ago, we could witness international organizations rapidly growing in size and numbers, which were related to the process of formation and emancipation of new countries on the international arena; today, we can observe a very significant increase in the number of networks and associations devoted to issues and areas which a decade ago would have been unthinkable. However, the research on rescaling States has also produced a significant counterargument: that the current state of the capitalist economy (including the effects of the COVID-19 pandemic) has led to the qualitative transformation of States rather than their dismantlement or erosion (Calzada, 2020; Calzada, 2021, p. 2).

This review essay aims to point to the transition from international law to transnational law as a background to the remarks on the role of cities in the context of the COVID-19 pandemic, the transition that on the one hand is caused, and on the other, is strengthened by the growing role of cities in the fight against COVID-19. Transnational law refers to developments beyond the nation-state and includes “all law which regulates actions or events that transcend national frontiers” (Dellavalle, 2020, p. 7). It is characterized by a plurality of overlapping normative systems and a growing role of new actors in the international arena (Dellavalle, 2020, pp. 8–9 ; Siemiątkowski et al., 2020), which in this case are cities. Cities fit perfectly into the concept of transnational law, which will be developed in the remainder.

After the introduction, section 2 gives examples of cities bypassing or complementing states (dynamic interactions between cities and states) with special emphasis on Polish cities. Section 3 points to the cities’ transnational cooperation to fight the COVID-19 pandemic, filling the gaps in inter-governmental multilateral cooperation. Section 4 indicates some new terminology that may be used to recognize the increasingly influential position of cities in international relations and international law. In Conclusions, the authors attempt to address the research problem and aim of the article.

The mainly used research method is literature analysis. This interdisciplinary article can be located at the intersection of international relations, legal and urban studies. Problems such as cities’ networks or transnational cooperation of cities have an obvious international or transnational dimension.

## **Cities Bypassing or Complementing States**

So far, legal texts and literature on international law contain hardly any references to cities. In traditional international law and international relations, nation-states were the only and then the main legal subjects or participants, respectively. However, cities are parts of states, and international law has to find ways to deal with the challenges cities pose as they seek greater autonomy from their states and become globally recognized actors. Still, depending on a country’s legislation, they are also semi-autonomous. Helmut Philipp Aust (2015, p. 270) argues that cities can be regarded as a ‘particular form of non-state actors in international

law: they are parts of states, but they also bring their to the international level own political identity which transcends this characteristic of belonging to “the state”. This quotation expresses the specific position of cities very well: they are part of nation-states, but their activities can transcend such states. For example, cities attempt to strengthen their position by establishing international city networks such as United Cities and Local Governments – currently one of the most renowned among city networks. It is a strategy whose goal is visibility in international relations, especially in their interactions with nation-states and international organizations (Porrás, 2008, pp. 538–539). Other important city networks include the International Union of Local Authorities, the World Association of Major Metropolises, the National League of Cities, Local Governments for Sustainability, also known as ICLEI (it was founded in 1990 as the International Council for Local Environmental Initiatives), the C40 Cities Climate Leadership Group (C40), Eurocities, the U.S. Mayors Climate Protection Agreement or the Megacities Foundation. Nowadays, these networks may facilitate and coordinate cities’ transnational/international cooperation in fighting the COVID-19 threat. For example, C40 highlights the role and potential of global cities responding to the virus and planning an equitable and sustainable recovery from the pandemic. In this place, WHO’s initiative WHO European Healthy Cities, a network developed in the 1990s, must be mentioned: “WHO Healthy Cities is a global movement working to put health high on the social, economic and political agenda of city governments. For 30 years, the WHO European Healthy Cities Network has brought together some 100 flagship cities and approximately 30 national networks” (WHO website).

Cities have successfully become increasingly active players on the international stage, and direct and institutionalized relations between the cities and global institutions have been intensifying and will intensify, particularly now. For example, the 1992 UN Conference on Environment and Development in Rio de Janeiro adopted *Agenda 21* (Nijman, 2011, p. 219). Its Chapter 28, *Local Authorities’ Initiatives in Support of Agenda 21*, states that as local activities are the source of both problems and solutions addressed by this document, its objectives can be fulfilled only with the cooperation and participation of local authorities, i.e., the governance level closest to people. Local authorities are responsible for social, economic, and environmental infrastructure, as well as for a variety of planning processes, local laws and policies (e.g., environmental ones), and implementation of locality-specific national and subnational policies. They are also the ones that are capable of – and vital in – promoting sustainable development by educating, mobilizing, and keeping dialogue with the citizens (United Nations Conference on Environment & Development Rio de Janeiro. *AGENDA 21*, 1992, para. 28.1). In the case of the current pandemic, cities are the ones to ensure the availability of services and materials that should be provided by nation-states, but the latter often fail to do that due to lack of resources, information, or incompetence of the central authorities. Hence, cities may offer an alternative to the state by performing some of its functions, and, in this way, they may bypass states. At the same time, it has to be emphasized that generally, when cities do so, they rather complement the states’ actions than

compete with them. Yet, there are also situations when states are unwilling to act to achieve a greater good that benefits their citizens or even the whole humanity (as happens when, e.g., the government is incompetent). During the COVID-19 pandemic, cities complemented nation-states, filling the gaps in state activities, including taking international obligations other than those accepted by their states. In this context, and keeping in mind the notion of transnational law, a conflict between state norms and municipal (sub-state) norms may arise, in particular in such fields as immigration (for example, 'cities of sanctuary' or cities dealing with the backlash of their nation-states against immigration) (Villazar, 2010, pp. 573–598; Szpak, 2019), environmental protection (for example American cities implementing Paris Climate Agreement when the US decided to withdraw from it) (Dellavalle, 2020, p. 10; Roberts, 2017) or finally, the health care and countering COVID-19 where cities act independently of their states, even to the point of bypassing them.

An example of actions taken by cities regardless of the state can be numerous Polish cities that have taken up the fight against the virus, often ahead of actions taken by the Polish government. Many cities immediately launched reserves for crisis management established in the cities' budgets, which have been used to combat and counteract the spread of COVID-19 disease, without anticipating funds to be provided by the central government. Cities primarily used their financial resources to purchase personal protective equipment and hospital equipment (i.e., ventilators and tests). Most cities also created special, constantly updated information portals devoted only to fighting the pandemic and contacting their inhabitants on the largest possible scale. Such cities include, among others, Warsaw, Poznań, Gdańsk, and Wrocław. In addition to immediate purchases and information campaigns, many Polish cities decided to expand their efforts to counteract coronavirus spread and its effects. These include the city of Poznań, which announced recruitment for the so-called small grants. Thanks to them, non-governmental organizations can obtain funding for activities that will support the residents of Poznań during the coronavirus pandemic (e.g., online events, neighborhood and volunteer assistance actions, activities related to the distribution of assistance to people in need). Another option offered by the city of Poznań is co-financing of activities carried out by NGOs, which are aimed at preventing the spread of the pandemic (e.g., funds for the purchase of personal protective equipment – PPE – and materials, the purchase or rental of equipment and materials enabling remote work). The action that involved bringing 57 tons of personal protective equipment to Poznań by the Kulczyk Foundation for the Doctors to Doctors Foundation was also broadcast widely in the Polish media. The city of Poznań supported the creation of a logistics base in the market hall for the materials purchased by the Foundation and provided free transport to the base (*Środki ochrony zdrowia od Kulczyk Foundation dotrą jutro do Poznania*, 2020). Similar activities are carried out by the Polish city of Wrocław, where the Wrocław Social Intervention Program for the NGO sector was launched concerning cultural and sporting activities. City authorities also took a number of actions directed at entrepreneurs, including the Wrocław Assistance

Package and activities carried out by the Entrepreneur Support Centre (*Wrocławski Pakiet Pomocowy dla przedsiębiorców w związku z epidemią koronawirusa*, 2020).

A similar situation occurred in the US, where many mayors were forced to act ahead of their federal or state governments. Among others, the mayors of Houston (Watts, nd), Phoenix (Watts, n.d.), or San Francisco (*C40, How San Francisco...*, n.d.) put 'stay at home' orders a few days ahead of federal and state orders. The same happened in Brazil, where mayors of Rio de Janeiro (Olivera, n.d.) and Sao Paulo (*Actions taken by the city of São Paulo to tackle COVID-19*, n.d.) introduced quarantine against President Bolsonaro's indications, or in Bogota (*C40, Early action to manage...*, n.d.) where measures were taken before the national lockdown was declared.

### **Cities' Transnational Cooperation to Fight COVID-19**

The multilateral system established by the US and allied states after WWII was supposed to address any worldwide crises, such as the present COVID-19 pandemic. However, this challenge put a strain on international cooperation, which hinders their effective actions. The World Health Organization is the main specialized UN agency tasked with coordinating global efforts in health. The WHO has at its disposal international pandemic preparedness mechanisms, such as the International Health Regulations (IHR 2005). Considering that it is difficult to predict specific responses required by specific public health risks (such as epidemics), the IHR creates the entire framework of rights and obligations that states have when facing public health emergencies and similar events that run the risk of spreading beyond the country's borders. The instrument of international law provided by the IHR has been accepted as legally binding by 196 states, including the 194 members of the WHO. Stemming from the experiences of past epidemics, the IHR establishes requirements necessary to minimize the international impact of a "public health emergency of international concern" as well as list the criteria of such emergencies.

Many voices have been criticizing the WHO, particularly since the beginning of 2020. They highlighted the absence of any major coordinated international endeavors to control the spread of the SARS-CoV2 virus. Inquiries were made as to the reasons for worldwide lack of preparedness for a global pandemic, specifically the causes of the WHO's failure to discharge its primary responsibility, i.e., protection of global public health. This issue, however, is only signaled here as it falls outside the scope of this review essay.

In contrast, governors and mayors were the ones who took decisive action and worked diligently to protect the lives of their residents, while many governments delayed taking action or refused to do so. Through relations and networks that connect cities worldwide, cities have been exchanging information, resources, and equipment to quickly protect their citizens against the pandemic. This situation is the newest example of the global collaboration of cities developing in recent years, hoping that city diplomacy may help save the multilateral system. Local leaders are pragmatic and innovative, and their strength and dynamics are

growing; provided nation-states allow it, the pattern of easy exchange of solutions between cities might provide a boost to revive the international system whose weaknesses and flaws have been quite dramatically exposed by the COVID-19 crisis (Hachigian & Pipa, 2020). For example, the International Affairs Director of Milan Vittoria Beria said that her current role involves searching for information provided by cities that had already experienced the pandemic and provided insight into crisis management issues. Following the concept of ‘paying it forward’, she stated that her city is ready to offer knowledge – both received from the predecessors and gathered from Milan’s own experiences – and support to cities that would be affected later. As Milan was the first European city so strongly and rapidly affected by the COVID-19 pandemic, the local authorities and citizens’ learning curve was steep. Yet, now they have much to offer in terms of data, solutions, and practices that can be useful in managing different aspects of the complex, multi-stage phenomenon that is a viral pandemic striking a modern city (Pipa et al., 2020).

The potential of cities to be health-generating places is immense, yet some of the factors that contribute to rapid growth and stimulate innovativeness and creativity may also lead to significant disparities in the population’s health level and access to health services. Managing and reconciling these tensions is a major challenge. Despite significant and visible differences in leadership capacity, power, and governance arrangement, all cities have resources to improve the health of their populations, whether by applying regulatory and other levers or by using soft powers at their disposal. Whichever tools they choose, city leaders must also be willing to spend their political capital in support of the change (Naylor & Buck, 2018).

Numerous examples of cities’ international or transnational cooperation and interactions can be observed at present. They include obvious solutions, such as cooperation between geographically neighboring cities, and are tangible proof of the actual cooperation of cities associated within regional or global cities’ networks or by taking advantage of the benefits of their country’s membership in a given international organization. One of the examples of such cooperation is the EU International Urban Cooperation (IUC) programme that is aimed at fostering links between cities to facilitate sharing solutions to commonly occurring problems. The programme is an element of a long-term EU’s strategy of cooperation with the public and private sector to promote sustainable urban development (*International Urban Cooperation*, n.d.). The programme included a video conference organized on April 9, 2020 for the IUC’s city-to-city component; the participants included Barcelona, Bologna, Granada, Greater Manchester, Mannheim, Nice, Rome, Stuttgart, Nice, and Liuzhou (Guangxi Province, southern China), and the topic was the COVID-19 pandemic and the ways to mitigate and limit its impact and to lay the foundations for future recovery. The Asian component of the IUC is significant not only as a source of experiences but also of tangible support. Just before the conference, the city of Qingdao delivered to its long-term partner city of Mannheim a substantial consignment of high-grade masks. A member of IUC, Liuzhou, provided help and shared experiences. To meet the needs of the country undergoing the COVID-19 outbreak, the city’s automotive plant (SAIC-GM Wuling) swiftly switched into producing

surgical-grade masks. Transports of donated masks have since been sent to Europe, e.g., to Rome. By now, Liuzhou has come out of lockdown – the industrial production has already been restored, while services and restaurants are beginning to operate as usual. There are plans to continue such video conferences of the EU-Asia component of IUC; the goal is to continue sharing crisis-related experiences and solutions and further cooperate in sustainable urban development (EU-China cities discuss the management of COVID-19, 2020). On April 17, 2020, the Union for the Mediterranean Secretariat and the European Commission's Directorate-General for International Cooperation took part in an online discussion held by PLATFORMA – the pan-European coalition of towns and regions. They were joined by other associations working on city and regional cooperation on national, European, and global levels. The purpose of the meeting was to analyze the actions undertaken to meet the pandemic-related challenges by the EU as a whole and by regions, municipalities, and local governments, i.e., the representatives of some of the institutions directly dealing with the outbreak. Mayors of different European and African cities discussed their opinions regarding preventative measures and responses necessary at the local level, pointing out that the recent outbreak highlighted the flaws in the healthcare systems of many states. The mayors concluded that cities across the globe must act in solidarity so that no one is left behind in the fight against the pandemic (*Local and regional authorities at the forefront of the COVID-19 pandemic*, 2020).

UNESCO and its stakeholders also consider that responding to the challenge of the global COVID-19 pandemic is their shared objective. An opportunity for cities of the world to join a collective action is provided by the UNESCO Creative Cities Network (UCCN); in the current situation, the Secretariat issued a call to the member cities to present on the forum their innovative solutions developed to combat the pandemic-related issues, in particular actions involving broadly understood culture and creativity, as stated in the organization's objective. The project was launched in mid-March to help spread useful data and pool ideas and information that can help and inspire the 246 Creative Cities' members and other cities around the world. The UNESCO Creative Cities Network considers the global COVID-19 pandemic as a call to strengthen the cooperation and solidarity among its participants and reinforce connections between individuals and communities, particularly through culture and creativity. So far, the UCCN Secretariat has received contributions presenting initiatives classified in one of the seven creative fields (crafts and folk arts, media arts, film, design, gastronomy, literature, and music) specified in the UCCN's statute, which demonstrates that cities have mobilized their cultural and creative potential to address the pandemic in such aspects as sciences and technology, education, social inclusion or support for professional groups, artists or disadvantaged groups (UNESCO, 2020).

Noteworthy are also the activities undertaken by C40 – the leading global network of cities devoted to actions connected with climate change to improve the health of cities and their inhabitants. Around the world, the C40 network connects 96 of the world's greatest cities and represents around 700 million people. Although its main goal is to deal with climate

change, C40 decided to share its network to strengthen the collaboration among cities in the face of an epidemic. The cooperation is based on science achievements and robust data collected mainly by mayors of the largest cities in the world. The network is now focused on overcoming the pandemic that hits cities the hardest, especially in the world's poorest and most vulnerable areas. To facilitate and enhance the cooperation, the C40 network hosts regular virtual meetings of mayors and cities' officials to share best practices and experiences and jointly face challenges in this extraordinary situation. Not only do senior officials representing the cities that were hit the hardest by the virus share their experiences regarding widespread testing, hospital isolation, and quarantine issues, but they also offer personal protective equipment and make essential information available to all cities via the C40 Knowledge Hub portal.

C40 Knowledge Hub is where C40 member cities support other cities in managing the crisis and preparing for the future recovery period. The portal collaborates with numerous third parties, including other cities' networks, journalists, and entities interested in offering support to the cities. The C40 Knowledge Hub is primarily focused on disseminating resources regarding:

- testing and tracing to minimize the number of cases, deaths, and socio-economic impact of COVID-19 on cities;
- methods of increasing healthcare capacity and providing quarantine spaces;
- best practices on physical (social) distancing in cities, especially while using public transport or shopping;
- meeting the demand for PPE, hospital beds, ventilators, and other necessary equipment (C40 networks identifies sources of the equipment and facilitates all initiatives to meet the cities' needs);
- key measures allowing preventing healthcare workers from becoming infected with COVID-19 and reducing transmission of the virus by them (C40, *Our support...*, n.d.).

However, it should be emphasized that C40 is taking *ad hoc* actions and is already preparing cities for the time when the pandemic is over. In April 2020, C40 Cities Network launched the Global Mayors COVID-19 Recovery Task Force to accelerate a sustainable economic recovery from the worldwide crisis. The new task force devotes its actions to adjusting public investments in creating a 'new normality' for cities' economies, public health, climate change, and increasing resilience to possible future shocks (i.e., recurrence of the pandemic) (Global Mayors COVID-19 Recovery Task Force, online).

Another example of international city networks reaction is Eurocities, running on its website Live updates on COVID-19. This organization was the first to make the combined experience of its members available to the international community (Eurocities, n.d.). Another approach to combating the crisis – though informal in terms of the standards in foreign affairs – was introduced by Los Angeles. The city established a WhatsApp group open for municipalities seeking a way to reach other afflicted cities and share useful information

(Rudakowska & Simon, 2020, p. 4). US cities have the freedom to make their own choices concerning international cooperation in fighting the pandemic. Medical equipment donations, fundraisers for partner cities abroad organized or encouraged by the local authorities constitute autonomous projects of American cities' local governments and can lead to disapproval from the federal government (Rudakowska & Simon, 2020, p. 7).

All the measures are taken with special regards to vulnerable and frontline communities, i.e., cities heavily hit by the pandemic or cities representing the Global South. Global South cities are places particularly vulnerable to negative consequences of the pandemic due to underdeveloped healthcare systems, already stretched thin before the pandemic, and a large percentage of citizens living near or below the poverty line, who, as a result, have extremely limited access to the healthcare system. However, a look at a relatively low number of cases in many Global South cities reveals that there is a window of opportunity to stop the spread of the pandemic, especially across African cities. Therefore, using its newly created tools (the Global Mayors COVID-19 Recovery Task Force and C40 Knowledge Hub) based on measures already being implemented in Asia and Europe, C40 Network focuses on delivering its experiences and approaches not only to cities already heavily impacted by the pandemic but in particular to Global South cities to help avoid the fate of many Chinese, European and American cities (*Global Mayors COVID-19 Recovery Task Force*, n.d.).

## Cities and Transnational Law Terminology

Although cities have been gaining visibility in international relations, they remain mostly invisible to international law. It is gradually changing, and the current COVID-19 pandemic may increase visibility and evidence of the efficiency of cities in dealing with the threat. Previous sections provided some examples of cities' activities in response to COVID-19 and – as transnational law is supposed to be a broader term than international law, accommodating the growing role of cities in the international arena, including their part in solving such global problems as the current pandemic – there is a clear connection between transnational law and the rising position of cities.

In sum, cities are considered a part of the global governance architecture (Acuto, 2013, p. 20) or multi-level/multi-layered governance (Auby, 2011, p. 208). Problem-solving actors in the international arena are no longer limited to nation-states and international governmental organizations such as the UN or WHO. It is of extreme importance that the mayors agreed to implement the WHO pledge to reach at least 80% vaccination coverage, to combat misinformation, to educate the populations about relevant health matters, and to share data and solutions regarding prevention and reduction of infectious disease spread (Muggah & Katz, 2020). When there is no efficient global leadership, cities, their networks, and philanthropic organizations are stepping up to the plate while national governments still tarry. COVID-19 pandemic made it also evident that in the world of globalized interactions, a resolution of large-scale problems and challenges may come from global, multi-level governance. As it

is a component specific to transnational law, this model can be described as transnational governance, where various executive networks work on solving global problems (Delavalle, 2020, p. 13). Such networks need not comprise only states and international organizations but also cities; in fact, city networks have recently become abundant.

The problem the multilateral institutions need to deal with is finding the best way to utilize the creative solutions and leadership that comes from cities' pragmatic approach and to protect at the same time the interests of the member states. While it has been commonly agreed that the multilateral international system needs to evolve to deal more effectively with present and future global challenges, the COVID-19 pandemic demonstrated how urgent such change is; even former skeptics have joined the voices demanding reforms. Inclusion of mayors in global policy-making by inviting and using their opinions, knowledge, and support could bring great benefits; however, this will require a change of the traditional world order to keep pace among national governments, which manage global financial markets and control military forces. The first pathways involving cities in formal proceedings within the multilateral system have been created: the Sustainable Development Goals (SDGs) adopted unanimously by the UN General Assembly in 2015 include a goal (SDG 11) specifically focusing on urban areas, which is a sign that national governments recognize the important role cities can play in their development priorities (Hachgian & Pipa, 2020).

Until recently, nation-states were the main actors in international relations and the main legal subjects of international law in its traditional version (Cassese, 2005, p. 2; Warbrick, 2003, p. 206). However, the landscape has been evolving with the emergence of what is perceived by some as 'new frontiers', i.e., cities and the networks they form (Ooman & Baumgärtel, 2018, pp. 607–630) or other entities operating below the national level that have become new actors in broadly understood international relations and international legal processes. Cities can be regarded as territorial non-State actors (van der Pluijm & Melissen, 2007, pp. 7–8), sub-national actors (Koo-hong, 2016, pp. 134–160; Acuto, 2013, p. 8; Roberts, 2017; Sassen, 2002, p. 1; Curtis, 2016, p. 4) or sub-State actors in contrast to non-State actors or 'state-related actors' (Amen et al., 2013, p. 38). As such new international actors, cities are to a degree independent. Hence, in the words of the already quoted Helmut Philipp Aust (2015, p. 270), cities can be considered a particular form of non-state actors in international law: they are parts of states but also bring their own political identity to the international level, which transcends this characteristic of belonging to "the state".

In this context, Christie Swiney (2020, pp. 233, 268) claims that we need new terminology/new conceptual framework to recognize and understand the increasingly influential position of cities in international law and international relations. A similar argumentation is presented by Robert McCorquodale, who postulates that international lawyers should develop concepts and practices consistent with these trends instead of serving only states. The language aspect of international law carries a great power because laws from lower levels show a general tendency to be compliant with it. Thus, lawyers have gained the ability to change perceptions through interpretation and conceptualization of the international legal

system (McCorquodale, 2004, p. 504). Helmut P. Aust (2015, p. 272) claims that ‘international law may embrace these new developments and open its conceptual arsenal for actors and norms which transcend the traditional framework’.

One of such terms may be transnational law and transnational relations that cover relations between states and non-state actors such as the mentioned cities. The term is not entirely new, as Philip C. Jessup used it in 1956 in his book *Transnational Law*. The motive for coining this term was the misleading nature of the term ‘international law’, which suggests that its subject is limited only to the relations of a single nation or state to other nations or states. One of the problems encountered by those who want to analyze the problems of the world community is the absence of a word or term that can describe the rules regulating not only states’ behavior but also that of other entities. The worldwide web of regulations includes national regulations, such as states’ legal systems; other law systems are international, e.g., the rules of customary international law or those introduced by various treaties. Still, there is no point in overstating the division between ‘national’ and ‘international’. In actuality, it can be seen that national systems are penetrated and influenced by international law in multiple ways. The reverse is also true: international law is shaped by national laws and practices. As a way of bridging this dilemma, Philip Jessup coined the phrase ‘transnational law’, which, according to him, is ‘to include all law which regulates actions or events that transcend national frontiers. Public and private international law are included, as are other rules that do not wholly fit into such standard categories’ (Jessup, 1956, p. 2; Chapter II, n.d., p. 61). By this logic, as long as national and international law had the effects of transcending national frontiers, they would constitute a part of transnational law, and the latter would be able to address actors both from the public (state and governmental) and private (non-governmental, civil society) sphere. However, in the eyes of other writers, transnational law is conceptually distinct from international and national law because its primary sources, as well as its subjects, are not nation-state agencies or treaty-based international institutions, but rather private actors – collective, corporate or individual – that may be involved in transnational relations (Cotterrell, 2012, pp. 500–524). Overall, with his concept, Jessup established a space within which other sources of law can be acknowledged, together with legal rules and other law-related knowledge that are of practical importance yet do not match the standard categories (Affolder, 2020).

Considering that, cities also fit the concept of transnational legal process formulated by Harold Hongju Koh (1996, pp. 181–207; Koh, 2017, p. 415), who foresees that municipalities and localities should join the ranks of international (transnational) actors, among other states, public and private entities. In Koh’s vision, all of these actors create and modify the hybrid that is transnational law (which combines domestic and international as well as public and private law): they generate *interactions*, which leads to *interpretations* of international law; this, in turn, becomes *internalized* into and binding under domestic law (Koh, 2017, p. 415). However, the current research on cities as bypasses in transnational law has merely scratched the surface of the issue; a case study going beyond public international law might

not be amiss here. Evan Fox-Decent draws attention to the fact that in transnational law, the source of norms are networks or legal organizations that transcend or span the nation-state (Fox-Decent, 2020, p. 5).

An idea not too distant from Koh's transnational legal process are transnational legal orders, proposed by Terence Halliday and Gregory Shaffer, who understand this conception as a framing perspective, encompassing the processes of transnational, international, national, and local law-making and practice, both public and private, in all its dynamic tension (Alter, 2020, p. 37). However, Karen J. Alter (2020, p. 37) considers the comprehensive nature of Halliday and Shaffer's definition of 'transnational legal orders' to be both an advantage and a drawback. The concept of transnational legal orders is by necessity a broad one, as it has to provide space in which the participants from all these levels and spheres can become involved in law-making. From this angle, the framework offered by transnational legal orders provides a corrective to international law approaches that overlook sub-national level actors, focusing solely on states and international institutions. However, the bottom-up approach to transnational legal orders is a tool better suited to identifying the plethora of modern participants in global rulemaking than explaining how these rules are implemented.

Swiney (2020, p. 232) proposes to use the notion of 'global law' and 'global relations', the former being defined as law 'primarily composed of voluntary, self-enforced commitments that are drafted, implemented, and enforced by global, non-state actors – notably including cities – but that are arguably no less 'real' than much of what qualifies as state-made international law'. Other interesting concept includes international urban law coined and defined by Louis Eslava and George Hill. They argue that the city's revival as an important element and participant of international debate has generated a dynamic relation between 'international and local urban laws and development policies', which can be identified as 'international urban law' (Enslava & Hill, 2020, p. 1). Another notion is international local government law, a term invented by Gerald Frug and David Barron (2006, p. 2) to emphasize emerging rules and regulations of innovative and comprehensive cities.

These concepts are an expression and evidence of the increasing role of cities in international relations, international law, and global multi-level governance. They are an attempt to, in a way, include and understand the position of cities in the international arena. On the one hand, these attempts are a consequence of the internationalization of cities and their activities and, on the other hand, of the urbanization of international law. These two trends seem to be closely connected and, above all, an extremely rapidly growing trend in the modern world. They are also an expression of de-formalization of international law laying at the roots of transnational law. The increasing interaction of cities with international law is likely to grow from direct incorporation and implementation into cities becoming involved in creating international law (Nijman, 2011, p. 227). They are also evidence of legal pluralism, which may be defined as a coexistence of state and non-state forms of adjudication. Legal pluralism accommodates well the growing role and visibility of cities, which is better reflected by the term 'transnational law'. This legal pluralism means that 'two or more legal

systems coexist in the same social field' (Clark, 2007, p. 765). As Dawid Bunikowski and Patrick Dillon (2017, p. 41) argue, '[i]n the case of legal pluralism, all rules that can be taken into consideration in a given case are *legitimate*, they are 'equally' important. Legitimacy may come from a legal system; more typically, it is vested in traditions, long-standing customs, beliefs, or religion. In the words of the Italian philosopher of law Francesco Viola, legal pluralism is not "plurality *in the order*" but "*of the orders*". Legal orders "compete and concur", says Viola, in the regulation of a course of action or actions concerning social relations of the same kind.

## Conclusions

As this article attempted to show, there is a transition from international law to transnational law that, on the one hand, is caused, and on the other, is strengthened by the growing role of cities in the fight against COVID-19. The notion of transnational law better reflects the position of cities in inter/trans-national relations and inter/trans-national law-making processes. Local governments create inter/trans-national legal rules, but their impact is more visible than in the implementation of such rules, as evidenced by the activities of cities in the areas of climate change or human rights.

Cities can crucially contribute to problem-solving, even in the case of such extreme global events as the COVID-19 pandemic, particularly if they multiply their strengths and potential through forming powerful networks. As Michele Acuto (2013, p. 169) concludes in his work, such governance assemblages as cities or city networks emerge not in a vacuum but rather in a complex environment filled with other structures they must bypass or intersect thus modifying their own nature. The discussed examples demonstrate that cities work with means and scales not accessible to national institutions (Davis et al., 2013). By becoming an element of the global multi-level governance, cities participate in managing global-scale problems, especially issues related to climate change and sustainable development (Goldin, 2013, p. 3), of which the COVID-19 pandemic is an example. One of the benefits of having cities cope with relevant global issues is that cities seem to be more efficient. Due to bypassing national sovereignty, they focus on practical rather than ideological approaches to problems, while states may be overly obsessed with the notion of their sovereignty and thus restrict such actions that may infringe it. In turn, cities/mayors tend to be more practical – they act and solve problems rather than protect sovereignty. Metaphorically speaking, cities are also more emotionally intelligent than nation-states (Coll, 2015). As Anna Rudakowska and Craig Simon (2020, pp. 4-5) argue, the COVID-19 crisis demonstrated that it is justified to think of cities as efficient actors; their focus is on achieving practical goals, and this is reflected in locally implemented policies. In the unprecedented situation, cities acted and reacted more quickly and flexibly than the states for two main reasons. Firstly, the exchange of information, solutions, and good practices were fast and efficient due to the multiple connections cities have formed. Secondly, the city networks and other relations

are usually characterized by a low level of formality, which significantly facilitates effective communication processes.

The concept of cities bypassing states also corresponds to the growing de-formalization of international legal order and international cooperation: cities have turned from a mere object of international regulations to a subject of/active participation in international relations. As mentioned, cities are a relevant element in implementing international law, particularly when their host-states are reluctant to fulfill their obligations or do not want to incur them despite this being in the best interest of the state population. As Gerald Frug and David Barron (2006, p. 8) argue, a new chapter has opened for cities, which now orient themselves externally rather than internally, forming global rather than domestic associations. Yishai Blank (2006, pp. 882–883) dares to describe the increased significance of cities in international relations as a return to the age of sovereign, independent cities, although in an entirely different global configuration. City-state relations have been transformed by the emergence of a global public city. Combined with the world population becoming increasingly urban (two-thirds of it are expected to live in cities by 2050 – World Urbanization Prospects, 2014), a state's future as well as that of the international legal order will be increasingly determined, or at least influenced, by its cities (Nijman, 2011, p. 218).

All of this also points to another transition – from the government to governance. What is implied in the concept of transitioning from regulation/government to governance is an attempt to establish and develop new relationships between the state and the constituents of society – from individuals and communities to associations, corporations and, religions – and redefine and reshape the modern civil society within the modern state. The concept makes use of different institutions of civil society (such as families or religious congregations) and the state (such as local governments) to promote the fundamental values of liberty and equality; the procedures it employs foster participation, cooperation, partnership, efficiency, voluntariness and flexibility (Blank, 2009, p. 518). Cities constitute a part of such a global multi-level governance structure, the one playing a more and more important role.

### **Disclosure Statement & Funding**

No potential conflict of interest was reported by the authors. This work was not supported by any external source. The authors take all responsibility for preparing and conducting the research.

### **Declaration of Conflicting Interests**

The authors declared no potential conflicts of interest with respect to the research, authorship, and publication of this article.

### **Funding**

The authors received no financial support for the research, authorship and/or publication of this article.

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