

THE OUTSOURCING OF PUBLIC ACTIVITIES AND ITS LIMITS IN THE COMPARATIVE LAW

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ABSTRACT: *This study proposes to perform a short presentation of the limits in which the externalization of the public activities may be performed in a few representative countries in the Romano-German law system (France, Germany, Spain, Italy) and the Anglo-Saxon law system (Great Britain). Although, in principle, the public activities that involve the exercise of sovereignty (justice, police, army) cannot be performed by the private sector, we will observe that there are different nuances from country to country. Finally, the compared analysis is exploited in the Romanian law through legislative (lege ferenda) proposals.*

KEYWORDS: *the externalization of public activities, the delegation of public service, the public functions, the contract in the public sector, the public-private partnership, core function*

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