

THE MATTER OF
KAMBEYO KA-KAUNDA & EMMIE CHENDA MKANDAWIRE
V.
REPUBLIC OF MALAWI
APPLICATION NO. 004/2022
JUDGMENT OF 24 SEPTEMBER 2026
PARTIAL DISSENTING OPINION OF JUDGE Rafaâ BEN ACHOUR

1. Whilst I agree with all the grounds and the operative part of the above judgment, I nevertheless disagree on one point, namely, the right to be tried within a reasonable time.¹

2. I regret that I am unable to endorse the majority's holding that the Republic of Malawi did not violate the Applicants' (Kambeyo Ka-Kaunda and Emmie Chenda Mkandawire) right to be tried within a reasonable time,² a right guaranteed by Article 7(1)(d) of the African Charter on Human and Peoples' Rights ('the Charter'). Indeed, in paragraph (v) of the operative part, the Court:

Holds that the Respondent State did not violate the Applicants' right to a fair trial with respect to the right to be tried within a reasonable time as provided under Article 7(1)(d) of the Charter

3. I would like to emphasise upfront that I agree with the Court's observation that the assessment of whether proceedings were conducted within a reasonable time:

requires an examination of the entire record of domestic proceedings, including the sequence of hearings, adjournments, and procedural steps taken by the parties.³

¹ Paragraphs 93-107 of the judgment.

² *Le temps, la justice et le droit*, Actes du colloque organisé à Limoges, en hommage au doyen Jean Carbonnier les 20 et 21 novembre 2003, PULIM, 2004.

³ Paragraph 106 of the judgment.

This assessment must be carried out on a case-by-case basis as:

The Court's analysis takes into account, in particular, the complexity of the case or of the proceedings relating to it, the conduct of the parties themselves and that of the judicial authorities in order to determine whether the latter "has been passive or clearly negligent."⁴

4. This approach is consistent with the Court's established jurisprudence, notably in the judgments in *Mariam Kouma and Ousmane Diabaté v. Republic of Mali*,⁵ *Beneficiaries of the late Norbert Zongo and Others v. Burkina Faso*,⁶ and *Wilfred Onyango Nganyi and 9 Others v. United Republic of Tanzania*.⁷
5. I shall focus on two issues presently, namely, (I) the manifestly unreasonable length of the proceedings in light of the requirements of a fair trial, on the one hand, and (II) the State's responsibility for judicial malfunctions and the effectiveness of the right to be tried within a reasonable time, on the other.

I. The manifestly unduly prolonged proceedings in light of the requirements of a fair trial

6. I disagree with the majority as to how these principles apply to the facts of the present case. In my view, proceedings which took more than nine years to reach a conclusion in a relatively straightforward land dispute, and which, from the time they were brought until their final resolution, spanned a period of nearly twelve years, cannot be regarded as having been conducted within a reasonable time in the absence of particularly serious and concrete justification. I therefore find a violation of Article 7(1)(d) of the Charter.

⁴ Paragraph 99 of the judgment.

⁵ *Kouma and Diabaté v. Mali* (merits), Judgment of 21 March 2018, (2018) 2 AfCLR 237.

⁶ *beneficiaries of the late Norbert Zongo and others v. Burkina Faso* (merits). Judgment (merits), 28 March 2014 (2014) 1 AfCLR 226.

⁷ *Wilfred Onyango Nganyi and 9 others v. Tanzania*, Application No. 006/2013 Judgment (merits), 18 March 2016 (2016) 1 AfCLR 507.

7. Neither (A) the nature of the dispute nor (B) the circumstances thereof can justify such a delay.

A. The requirement of a reasonable time and its assessment under the Charter in the light of the nature of the dispute

8. Article 7(1) of the Charter provides that “Every individual shall have the right to have his cause heard”. This guarantee expressly includes, in subparagraph (d), “The right to be tried within a reasonable time by an impartial court or tribunal”. The reasonableness of the time is therefore not an administrative or secondary consideration. It is unequivocally a treaty guarantee of a fair trial.
9. The *Principles and Guidelines on the Right to a Fair Trial and Legal Aid in Africa*, adopted by the African Commission on Human and Peoples’ Rights in 2003, confirm this requirement. They provide, amongst the essential elements of a fair hearing, a person’s right to have his/her rights and obligations determined ‘without undue delay’ and with adequate notice and the grounds for decisions. These Principles and Guidelines were specifically drafted to reinforce the guarantees of the Charter, in compliance with international standards on fair trial.
10. This requirement is of particular importance in civil proceedings. The right to a fair trial would be considerably undermined if a person were able to bring a case before a court but had to wait forever before their rights and obligations were finally determined.
11. Delayed justice may, in practice, lose a substantial part of its effectiveness. In a land dispute such as the one in the present case, prolonged uncertainty over the title to the property directly affects the legal certainty of the Parties. It may also have significant economic and financial consequences. The right to be tried within a reasonable time is specifically intended to prevent litigants from remaining in this state of unduly prolonged uncertainty.

12. The Court rightly points out that there is no standard duration which, on its own, would lead to a finding of a violation of Article 7(1)(d). It is nevertheless important to distinguish between two non-equivalent propositions. The first is that a specific duration does not automatically constitute a violation. The second would be to consider that an exceptionally long period remains reasonable if the applicant cannot precisely identify the cause of each period of inactivity.
13. I do not believe that the Court's jurisprudence supports this second proposition. The absence of a numerical threshold does not mean that the duration of the proceedings is of no legal effect. On the contrary, the longer the duration, the more convincing the justification required from the State for same must be.
14. Proceedings lasting a few months may be reasonable in almost all circumstances. Proceedings lasting several years already call for closer scrutiny. Proceedings lasting more than nine years in a relatively straightforward case require, in my view, a particularly rigorous justification. This is not a matter of introducing an automatic nine-year threshold into the Court's jurisprudence.
15. It is about recognising an obvious principle arising from the very requirement of 'reasonableness': an exceptional duration calls for an exceptional justification. In the present case, such justification has not been provided.
16. The first relevant criterion is the complexity of the case. The judgment itself describes the case as a 'straightforward land dispute'⁸ and acknowledges that the duration of nine years, five months and twenty-nine days 'appears to be too long'⁹ given the nature of the case. This finding should, in my view, have led to a more rigorous examination of the time taken. Nothing in the

⁸ Paragraph 95 of the judgment.

⁹ Same paragraph.

evidence submitted to the Court establishes that the case involved exceptional factual or legal complexity that might account for its duration.

17. This was not a case involving a very large number of parties, an exceptional volume of evidence, particularly complex expert reports or novel legal issues of exceptional difficulty. It essentially entailed determining the respective rights of the Parties in respect of a piece of land.
18. The nature of the dispute therefore constitutes a factor that strongly supports a finding of an unreasonable delay. It is worth recalling here the approach taken by the European Court of Human Rights¹⁰ in *Zimmermann and Steiner v. Switzerland*.¹¹ In that case, the Court considered that nearly three and a half years before one level of jurisdiction already constituted a considerable length of time warranting careful scrutiny. It noted that the case was not particularly complex and that the applicants did not contribute to the delay. More significantly still, in *Baggetta v. Italy*,¹² the European Court declined to accept that structural difficulties within the judicial system could justify a duration exceeding nine years.
19. This jurisprudence is obviously not a benchmark directly applicable to the Charter. It nevertheless illustrates a widely held view of what constitutes a reasonable time: where a straightforward case remains pending for a particularly long period, the State must provide a convincing explanation. In the present case, we are faced with a duration more than twice as long as that which had already been deemed considerable at a single level of jurisdiction.

B. The circumstances of the case do not justify the exceptionally long duration of proceedings

¹⁰ LAMBERT, 'The concept of reasonable time in the case law of the European Court of Human Rights', RTDH, 1991, p. 3.

¹¹ ECHR, Chamber, 13 July 1983, [https://hudoc.echr.coe.int/eng#{%22itemid%22:\[%22001-62165%22\]}](https://hudoc.echr.coe.int/eng#{%22itemid%22:[%22001-62165%22]})

¹² ECHR, Judgment of 25 June 1987. [https://hudoc.echr.coe.int/fre#{%22itemid%22:\[%22001-61985%22\]}](https://hudoc.echr.coe.int/fre#{%22itemid%22:[%22001-61985%22]})

20. The dates set out in the judgment are particularly significant. Proceedings before the High Court were brought on 20 April 2010 and the said court rendered its judgment on 9 June 2014, that is, a period of four years, one month and twenty days. The appeal to the Supreme Court of Appeal was lodged on 22 July 2015 and the apex court rendered its judgment on 2 August 2016, that is, a period of one year and eleven days.
21. As regards the review application, it was filed in December 2017 and received by the Supreme Court of Appeal in June 2019, whilst the final review judgment was not delivered until 6 April 2022. In all, it took nine years, five months and twenty-nine days. However, it should also be noted that the Court's own temporal jurisdiction is defined in the judgment as running from 20 April 2010 to 6 April 2022. This period corresponds to nearly twelve years.
22. I do not dispute that there may be delays between certain procedural stages which should not be attributed to the State. However, these periods of delay must be identified and justified; they cannot simply be omitted from the calculation on the grounds that their cause cannot be determined from the record.
23. In my view, herein lies one of the main difficulties with the majority's reasoning. The absence of information regarding the cause of a delay does not render that delay legally irrelevant. It means, precisely, that the Court does not know why the delay occurred.
24. However, when faced with such exceptionally lengthy proceedings, this uncertainty should not be resolved to the detriment of the right guaranteed by Article 7(1)(d).

25. The Applicants stated that the High Court adjourned the case on eleven occasions¹³ and that the Supreme Court of appeal adjourned the hearing on thirteen occasions.¹⁴ I recognise that these assertions must be treated with caution where they are not supported by the full court records. However, they cannot simply be ignored. Their significance must be assessed in conjunction with the overall duration of the proceedings.
26. Eleven adjournments at first instance and thirteen on appeal constitute, at the very least, a serious indication requiring an explanation. If these adjournments were attributable to the Applicants, it was for the State to establish this. If they resulted from circumstances beyond the Parties' control, it was also incumbent on the State to explain their nature. If they resulted from difficulties inherent in the functioning of the courts, such difficulties then fall within the State's institutional responsibility. In none of these scenarios does the mere absence of any mention in the record allow the conclusion that the duration was reasonable.
27. The judgment partly justifies the unduly prolonged proceedings by noting that the Applicants and the State exhausted all domestic legal remedies. I do not consider that this circumstance, in itself, justifies the delay.
28. The exercise of local remedies is a procedural guarantee afforded to individuals. It cannot subsequently be used to subvert the protection afforded them under Article 7(1)(d) of the Charter.
29. A distinction must be drawn between the existence of multiple-layered jurisdiction and the slowness of proceedings at each of those levels. The fact that a case may be heard by several courts explains why it may involve several decisions. It does not explain why each of those decisions takes several years.

¹³ Paragraph 93 of the judgment.

¹⁴ Same paragraph.

30. In other words: the exhaustion of legal remedies explains the existence of multiple decisions; it does not explain the slowness with which each of these decisions is delivered. A person who brings a legal action provided for under domestic law does not, in so doing, waive their right to have that action examined within a reasonable time. Moreover, a contrary interpretation would create a paradoxical effect: the more a litigant makes use of the judicial mechanisms made available to them by the State, the greater the risk that they would lose the benefit of the guarantee of a reasonable time. Such an approach would be difficult to reconcile with the right to an effective remedy.
31. The African Commission's decision in *Odjouoriby Cossi Paul v. Benin*¹⁵ is particularly relevant. This case concerned a civil dispute relating to property. The African Commission expressly reiterated that Article 7(1)(d) guarantees the right to be tried within a reasonable time and found that the proceedings before the court of appeal had been unduly prolonged. It concluded that the delay was contrary to Article 7(1)(d) and called on Benin to take the necessary measures to ensure that the appeal was heard as quickly as possible, as well as to pay compensation for the damages resulting from the unduly delayed proceedings.
32. The decision referenced is of particular significance in the present case for two reasons. Firstly, it confirms that the requirement of a reasonable time fully applies to civil and property proceedings. Secondly, it confirms that undue prolongation of legal proceedings in itself constitutes a violation of Article 7(1)(d), irrespective of the final outcome of the dispute.

¹⁵ African Commission on Human and Peoples' Rights, 199/97, 4 June 2004, <https://achpr.au.int/en/decisions-communications/odjouoriby-cossi-paul-benin-19997>

II. State responsibility for judicial malfunctions and the effectiveness of the right to be tried within a reasonable time

33. The jurisprudence of this Court is consistent with this approach. In *Wilfred Onyango Nganyi and 9 others v. the United Republic of Tanzania*,¹⁶ the Court found a violation of the right to be tried within a reasonable time and ordered the State to take all necessary measures to expedite and conclude the judicial proceedings in question. In that case, the Court placed particular emphasis on the conduct of the judicial authorities and their duty of diligence. It follows from this jurisprudence that the decisive criterion is not simply whether proceedings ultimately resulted in a decision but more importantly whether they were concluded within a timeframe that meets with the requirements of a fair trial.
34. In the present case, the Applicants cannot be faulted for (A) the shortcomings of the national judicial system. Furthermore, (B) the effectiveness of the guarantee of a reasonable time and the need to find a violation of Article 7(1)(d).

A. The Applicants cannot be faulted for the shortcomings of the national judicial system

35. The judgment appears to consider that the absence of court records and procedural documents prevents a determination as to whether the delays are attributable to the State. I consider that this approach confuses two distinct issues: establishing the facts and assignment of individual responsibility.
36. Assigning the State's international responsibility does not require the Court to identify the specific judge, court registrar, administrative department or authority responsible for each day's delay.

¹⁶ Already cited.

37. This principle is clearly illustrated by the judgment of the European Court in *Zimmermann and Steiner v. Switzerland*.¹⁷ In that case, the Strasbourg Court expressly stated that it was not required to determine which specific national authority was responsible for the violation: the only relevant determination was that of the State's international responsibility.
38. This approach strikes me as particularly relevant in the context of the present case. The right guaranteed by Article 7(1)(d) is a right of the individual vis-à-vis the State as a whole. The individual need not know whether his or her case was left unresolved in a judge's chambers, at the court registry, in a court division, in the pre-trial preparation office or within the judicial administration. What matters from the point of view of international responsibility is that the State's judicial system failed to ensure that his or her case was determined within a reasonable time.
39. Whether the time taken is reasonable is therefore not measured solely by the ability to identify individual fault; it is measured by the objective capacity of the judicial system to deliver justice within a timeframe consistent with the nature and stakes of the dispute.
40. This, in my view, is the most problematic aspect of the reasoning set out in the judgment. It notes that the Applicants did not produce all the internal files, in particular the records of adjournments and the procedural timetables. It concludes from this that it is unable to verify the precise causes of the delays or whether they are attributable to the State.
41. However, the documents in question are precisely those emanating from the internal workings of domestic courts. There is therefore an objective asymmetry between the Parties. The Applicants are the users of the judicial system. The State is its organiser.

¹⁷ Already cited.

42. Court registers, adjournment orders, court schedules and administrative documents relating to the handling of cases are, by their very nature, documents that are primarily under the control of national judicial institutions.
43. It would therefore be excessively formalistic to require the Applicants to establish, by means of documents to which they do not necessarily have access, every period of inactivity within the judicial system.
44. I am not proposing to reverse the burden of proof as a general rule in all cases concerning reasonable time. I consider, however, that where an applicant establishes an exceptionally long duration in a straightforward case, and where the State fails to provide any explanation to justify that delay, the absence of internal documents should not automatically lead to the rejection of the complaint.
45. The opposite line of reasoning would create a paradoxical situation: the more incomplete or inaccessible court records are, the more difficult it would become to demonstrate a violation resulting precisely from the functioning of the judicial system. This would amount to treating the inadequacy of court records as a mitigating circumstance for the State. Such a consequence does not, in my view, appear compatible with the object and purpose of Article 7(1)(d).
46. This consideration is reinforced by a circumstance specific to the present case: the Respondent State does not advance any arguments on the merits. The judgment expressly notes this. The State's failure to do so certainly does not preclude the Court from examining the Applicants' allegations rigorously.
47. Neither should it be regarded as legally irrelevant when the State is precisely the party best placed to explain the functioning of its own judicial system.

48. The State could have provided an explanation for the many years that elapsed between the various stages of the proceedings. It could have set out the reasons for the adjournments. It could have established that certain delays were due to the Applicants' conduct. It could have invoked particular complexity, a temporary and exceptional backlog in the courts, procedural difficulties or any other objective circumstance. It did not do so.
49. There is therefore no explanation in the record from the State that would allow an objectively exceptional duration to be regarded as reasonable. In these circumstances, I consider that the Court was required to assess, taken together, the State's silence, the overall duration, the simplicity of the dispute and the available information concerning the adjournments.
50. Another consideration strikes me as essential. Even where a delay is linked to an overload on the courts, lack of resources, poor organisation of the court registries or administrative difficulties, it does not cease to be attributable to the State under international law.
51. In the *Zimmermann and Steiner* judgment referred to above, the ECHR specifically examined the argument concerning the court's excessive workload. It concluded that the difficulties encountered by the court could not, after a certain period, be regarded as temporary and could not deprive the applicants of their right to be tried within a reasonable time. It also emphasised that it was not for it to determine which national authority was responsible: the relevant responsibility lay with the State.
52. This approach is particularly important for international human rights courts. International law does not permit the State to shirk its treaty obligations by invoking the organisational failings of its own institutions. The State must organise its judicial system in such a way as to enable the courts to meet the requirements arising from fundamental rights.

53. A litigant cannot be forced to endure for years the consequences of the shortcomings of the judicial system on which they rely to have their rights determined.
54. I also consider that excessive fragmentation of the proceedings should be avoided. The Court must, of course, examine the various stages of the proceedings. However, such an analysis is only meaningful if it enables an assessment of the overall duration of the justice administered to the litigant.
55. The judgment itself states that the assessment must cover the case as a whole, including the sequence of hearings, adjournments and procedural steps. This holistic approach must also be applied to the conclusion. It is therefore not sufficient merely to note that each level of jurisdiction operated in accordance with its own rules and procedures.
56. Compliance with procedural rules does not, in itself, justify the time taken to implement them. A procedure may be legally sound at every stage and yet excessively lengthy overall. Procedural regularity and judicial promptness are two distinct requirements of a fair trial. One cannot override the other.
57. The duration of the review proceedings is of particular importance. The Applicants exercised a remedy provided for under domestic law. This circumstance cannot be used against them. The review proceedings nevertheless dragged on for several years, until 6 April 2022.
58. It should also be noted that the Applicants alleged that they did not receive a signed or certified copy of certain decisions and neither did they receive a legible or official version of the 6 April 2022 decision. The judgment echoes these concerns, as well as the requirements of national procedural rules regarding the formalisation and certification of decisions. This is not merely a formal matter. The reasonable time limit must be assessed in light of the litigant's actual ability to obtain an effective and intelligible determination of their rights.

59. A delayed decision, the grounds for which are not made available to the litigant in an official and intelligible form, does not fully produce the effect expected of a judicial decision. On the contrary, it prolongs legal uncertainty.

B. The effectiveness of the guarantee of a reasonable time and the need to find a violation of Article 7(1)(d)

60. The various international sources cited in the judgment converge on the same principles.
61. At the African level, Article 7(1)(d) of the Charter expressly guarantees the right to be tried within a reasonable time. The African Commission, in *the case of Odjouoriby Cossi Paul v. Benin*,¹⁸ () applied this guarantee to a civil dispute and found a violation due to the undue prolongation of the appeal proceedings.
62. The *Principles and Guidelines on the Right to a Fair Trial and to Legal Aid in Africa* also enshrine the right to a determination of rights and obligations ‘without undue delay’.
63. At the level of the African Court, the judgment in *Wilfred Onyango Nganyi*¹⁹ confirms that the conduct of the judicial authorities and their diligence are determining factors in assessing what constitutes a reasonable time.
64. At the European level, the Grand Chamber judgment in *Frydlender v. France*²⁰ established the classic criteria relating to the complexity of the case, the applicant’s conduct, the conduct of the authorities and what is at stake for the person concerned.

¹⁸ Already cited.

¹⁹ Judgment of 10 March 2016 (Merits) already cited

²⁰ ECHR, 27 June 2000, [https://hudoc.echr.coe.int/eng#{%22itemid%22:\[%22001-58762%22\]}](https://hudoc.echr.coe.int/eng#{%22itemid%22:[%22001-58762%22]})

65. In the judgment in *Zimmermann and Steiner v. Switzerland*,²¹ the European Court held that nearly three and a half years before a single court already was a considerable length of time warranting thorough scrutiny, and found a violation despite the difficulties encountered by the court.
66. These treaty systems are certainly not identical. Nevertheless, they reflect a common fundamental principle: the right to a fair trial requires the State to organise its judicial system in such a way that the rights of litigants are determined within a timeframe that remains compatible with the nature and stakes of the dispute.
67. If we apply the criteria established by the Court's jurisprudence, the outcome seems clear to me.
68. Firstly, the complexity of the case. There is nothing to suggest that the land dispute is sufficiently complex to justify proceedings of this duration.
69. Second is the conduct of the Applicants. There is nothing in the record to suggest that they engaged in delay tactics or that they were responsible for a substantial part of the delay. The judgment itself notes that there is no evidence to suggest that the parties deliberately obstructed the proceedings.
70. Thirdly, the conduct of the judicial authorities. The proceedings lasted four years before the High Court, over a year before the Supreme Court at the initial stage, and several further years during the review stage. Added to this is the significant number of adjournments alleged by the Applicants.
71. Fourthly, the subject matter of the dispute. The case concerned the determination of property rights in respect of a plot of land, meaning that the prolonged uncertainty was not without consequences for the Applicants.

²¹ Already cited.

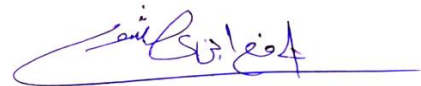
72. Fifthly, the justification for the delay. The Respondent State does not state any grounds to explain the length of the proceedings.
73. Taken together, these factors clearly point to a finding of a violation.
74. I am particularly concerned about the potential implications of the reasoning adopted in this judgment. If, in a straightforward case that lasted more than nine years, the Court refuses to find a violation on the grounds that the Applicant does not produce all the documents necessary to explain each period of delay, the threshold of protection afforded by Article 7(1)(d) risks becoming excessively high.
75. This risk is all the greater given that the documents required to reconstruct the timeframes accurately are often produced and held by the State's judicial institutions.
76. Article 7(1)(d) must not be interpreted in such a way as to make it practically impossible to establish a violation in cases where institutional failings result, precisely, in the poor preservation or limited accessibility of court documents.
77. On the contrary, an interpretation consistent with the effective purpose of the Charter requires that the Court be able to assess the overall duration of proceedings based on all the available evidence.
78. Where proceedings are found to have been exceptionally lengthy and there is no convincing explanation thereof, the Court must be able to draw the necessary treaty conclusions.
79. I recognise that there is not, and should not be, an automatic numerical threshold beyond which any proceedings become contrary to Article 7(1)(d).
80. However, the absence of such a threshold cannot lead to a duration of more than nine years in a relatively straightforward case being accepted as

reasonable without requiring the State to provide a particularly convincing justification.

81. In the present case, the proceedings began on 20 April 2010 and were not finally resolved until 6 April 2022. The judgment itself records a cumulative duration of nine years, five months and twenty-nine days.
82. The judgment acknowledges that this duration may seem excessive for a simple land dispute. However, in my view, there are no exceptional circumstances to explain this duration. It has not been established that the Applicants caused the delays. The number of alleged adjournments is significant. The State does not provide any justification.
83. The documents that might explain the delays in detail are, for the most part, documents relating to the functioning of the domestic courts.
84. Finally, the exercise of legal remedies cannot be used to justify exceptionally lengthy proceedings.
85. The issue before the Court is therefore, in my view, less a question of whether each day's delay can be attributed to a specific individual than whether, taken as a whole, the State's judicial system administered justice to the Applicants within a reasonable time.
86. My answer is in the negative. For all these reasons, I consider that the duration of the domestic proceedings — nine years, five months and twenty-nine days according to the timelines set out in the judgment — was manifestly excessive in view of the nature of the dispute, its relative simplicity, the absence of evidence of delay tactics on the part of the Applicants, the significant number of alleged adjournments and the lack of justification provided by the Respondent State.

87. Above all, I consider that the absence, in the record submitted to the Court, of evidence enabling each period of delay to be precisely attributed cannot be used to exonerate the State when such evidence relates primarily to its own judicial system and when the Applicants themselves encountered difficulties in obtaining the relevant court documents.
88. The right to a fair trial would be deprived of part of its substance if a State were able to rely on the shortcomings of its own system for the preservation of and access to court records to evade liability arising from excessively lengthy proceedings.
89. In my view, Article 7(1)(d) of the Charter requires the State not only to provide access to a judge, but also to ensure that a judicial decision is delivered within a timeframe that is compatible with the requirement of effective justice.

Judge Rafaâ Ben Achour



Done at Arusha, this Twenty Fourth Day of September in the Year Two Thousand and Twenty-Six, the French text being authoritative.