AFRICAN BAR ASSOCIATION
2026 ANNUAL CONFERENCE
20TH – 24TH SEPTEMBER 2026
OASIS ATLANTICO HOTEL BELORIZONTE, SAL
REPUBLIC OF CABO VERDE

COMMUNIQUE

WHEREAS

The African Bar Association (AFBA) held its 2026 Annual Conference from 20TH – 24TH September 2026 at the Oasis Atlantico Hotel Belorizonte, Sal**,** Cabo Verde.

(1) The Theme of the Conference was " Resilient Africa's Roadmap For Sustainable Development: Strengthening and Addressing Issues of Military, Security and Economic Stability"

(2) There were fifteen breakout sessions dealing with several subthemes of the conference such as the role of Women as Catalysts for security reform, economic development and sustainable development in Africa, Human Rights, Aviation, Access to Justice, Security, the Great Lakes Region, Taxation, Capital markets, Artificial Intelligence, Infrastructure, Intellectual property, Data privacy, Reparations and the Rule of Law. At the Breakout sessions, participants examined the conference theme from these and other perspectives and made recommendations. There were meetings of various committees and fora of the AFBA as well as social events.

(3) The opening ceremony was held on **Monday 21st September 2026** and the Conference was opened by the Acting President of the Republic of Cabo Verde, Her Excellency Mrs Janira Hopffer Almada. Also present at the Opening Ceremony were the Honourable Minister of Justice and Parliamentary Affairs of the Republic of Cabo Verde, Dr Clóvis Isildo Silva; representative of the Supreme Court of the Republic of Cabo Verde, the Honourable Justice Zaida Lima; the Honourable Julio Lopes, Mayor of Sal; the Honourable Attorney General and Minister of Justice of the Federal Republic of Nigeria Prince Lateef Fagbemi SAN; the Honourable Deputy Attorney General of the Republic of Uganda, the

Honourable Kafuuzi Jackson Karugaba; the representatives of the Honourable Minister of Justice and Human Rights of the Republic of Guinea Bissau, Dr. Luis Alberto Mendes Correia Landim Ribeiro & Dr. Bernardina Aurelia Gomes, Director General of the Administration of Justice and Advisor for the Area of Cooperation and Human Rights respectively, of the Ministry of Justice and Human Rights of the Republic of Guinea-Bissau; the representative of the Honourable Minister of National Defence of the Republic of Angola- Mr Hélder Cafala, Director General of the National Defence Institute (IDN) Angola; the representative of the Armed Forces of the Republic of Gambia- Brigadier General Sait Njie, Deputy Chief of Defence Staff of the Republic of Gambia; Representative of the Chief of Naval Staff Nigeria, Rear Admiral J.N Mamman, Chief of Administration at the Nigerian Navy Headquarters; President of the Ghana Bar Association, Mrs Efua Ghartey; President of the Liberian National Bar Association Counsellor Juah Lawson; 2nd Vice President of the Nigerian Bar Association, Mr Egya Nuhu John; the Secretary General of the Cameroon Bar Association, Mr Serges Martin Zangue; the former President of the International Criminal Court Bar Association, Chief Charles Taku; Military officers and men from Burundi, Cote d'Ivoire, Gambia, Guinea Bissau, Nigeria & Zambia were present. There were also delegates from non-governmental organisations such as the Darfur Diaspora Association and Stand For Our Parents, Centre For African Policy Research and Advisory, Lawyers and Resource Persons from across Africa and other parts of the world such as Angola, Burundi, Cabo Verde, Cameroun, Canada, Cote d'Ivoire, Ghana, Guinea-Bissau, Kenya, Liberia, Netherlands, Nigeria, Sierra Leone, U.S.A, Uganda and Zambia among others.

There were also officials of agencies of Governments and representatives of other International Bodies. The Governing and Executive Council Members of the African Bar Association were all present.

(4) Speeches were delivered by the President of the African Bar Association, High Chief Ibrahim Eddy Mark; the President of the Cabo Verde Bar Association, Dr Julio Martins Jnr; the representative of the Darfur Diaspora Association, Mr. Abdalllah Abu Garda; the representative of Stand For Our Parents-Mr Jean De Dieu Nsanzabandi; the representative of the Chief of Naval

Staff of Nigeria, Rear Admiral J.N. Mamman; the President of the Ghana Bar Association, Mrs. Efua Ghartey; the President of the Liberian National Bar Association, Counsellor Juah Lawson; Mr Egya Nuhu John, the 2nd Vice President of the Nigerian Bar Association; Mr Serges Martin Zangue the secretary General of the Cameroon Bar Association; the representative of the Honourable Minister of Justice and Human Rights of the Republic of Guinea-Bissau, Dr Luis Alberto Mendes Correia Landim Ribeiro; the representative of the Minister of National Defence of the Republic of Angola, Dr Hélder Cafala; the Deputy Attorney General of the Republic of Uganda, Honourable Kafuuzi Jackson Karugaba; the Honourable Attorney General and Minister of Justice of the Republic of Nigeria, Prince Lateef Fagbemi SAN; the Mayor of Sal, Cabo Verde, Honourable Julio Lopes; Honourable Justice Zaida Lima of the Supreme Court of the Republic of Cabio Verde; the Honourable Minister of Justice and Parliamentary Affairs of the Republic of Cabo Verde, Dr Clóvis Isildo Silva and the Acting President of the Republic of Cabo Verde, Her Excellency Mrs. Janira Hopffer Almada.

(5) African Bar Association Medals of Merit in Leadership were presented to the following persons for their outstanding service to Africa through promotion of resilient culture and sustainable development in their areas of endeavour and the promotion of the Rule of law: Honourable Dele Kevin Oye; Mr Serges Martin Zangue SG & Mrs. Ligia Arcangela Lubrino Dias Fonseca.

(6) The Keynote Speaker was Prof Ibrahim Agboola Gambari CFR OCORT, twice a United Nations Under-Secretary General and Special Adviser and currently, a member of the of the African Union's High-Level Panel for the Review of the Africa Union Peace and Security Framework. His keynote speech on the theme of the conference, enunciated the message that Africa's sustainable development depends on restoring constitutional governance, improving security, strengthening the rule of law, and using continental economic integration to build resilience.

(7) The speeches at the Opening Ceremony formed the background for the conference which successfully came to an end on **Thursday 24th September 2026.**

RESOLUTIONS AND RECOMMENDATIONS

Upon deliberation on the speeches and papers presented and the comments and reports received at the conference, the African Bar Association makes the following recommendations and resolutions:

(1) To thank the Acting President of the Republic of Cabo Verde, Her Excellency Mrs. Janira Hopffer Almada and all the officials and people of the Republic of Cabo Verde who were in attendance or contributed to the success of the conference.

(2) To thank the Honourable Minister of Justice and Parliamentary Affairs of the Republic of Cabo Verde, Dr Clóvis Isildo Silva and all the staff of the Ministry of Justice & Parliamentary Affairs for all their actions in making the 2026 Annual Conference a very successful Conference.

(3) To thank the Honourable President of the Constitutional Court of the Republic of Cabo Verde, His Lordship, Honourable Justice Jose Manuel Avelino De Pina Delgado and the Honourable Justices of the Constitutional Court of the Republic of Cabo Verde.

(4) To thank the Honourable President of the Supreme Court of the Republic of Cabo Verde, His Lordship, Honourable Justice Benfeito Mosso Ramos and his representative, The Honourable Justice Zaida Lima and the Honourable Justices of the Supreme Court of the Republic of Cabo Verde.

(5) To thank the President of the Cabo Verde Bar Association and the officers and members of the Association for their roles in achieving a successful conference.

(6) To thank the guests at this year's annual conference for honouring our invitation.

(7) To thank members of the International Steering Committee of the Conference, the Local Organising Committee, the African Bar Association's Continental and Regional Officers and the Chairperson and Members of the African Bar Association, Governing Council and Committees for their contributions to the success of this year's conference.

(8) To thank the Members of the Armed Forces and other Security agencies who participated and supported the conference. To give

special thanks to the Ministers of Defence & Chiefs of Defence Staff of Angola, Burundi, Cabo Verde, Cote D'Ivoire, Gambia, Guinea-Bissau, Nigeria & Zambia.

(9) To thank the sponsors, resource persons and conference participants for their support, contributions and active participation all of which enriched the conference.

(10) To thank our **Keynote Speaker, Prof Ibrahim Agboola Gambari CFR OCORT,** and all our special guests for their valuable contributions.

(11) Noting that the African Bar Association (AFBA), as the continental professional body of lawyers, has both a moral and a professional duty to defend the rule of law, judicial independence, the integrity of international justice mechanisms, the protection of civilians, and the fundamental rights of all persons in Africa;

(12) Considering that the 2026 Annual Conference has received submissions from member associations, victims' groups, and legal experts concerning urgent and ongoing crises requiring immediate attention, including the war in Darfur and Sudan, the crisis in Southern Cameroons, xenophobic violence across the continent, terrorist attacks in the Sahel and West Africa, and the politicisation of international justice mechanisms;

(13) Aware that Africa stands at the center of global attention due to its abundant natural resources, its youthful and growing population, and strategic geopolitical position;

(14) Convinced that Africa's sustainable development depends on restoring constitutional governance, improving security, strengthening the rule of law, and using continental economic integration to build resilience;

(15) Convinced that Africans and African states must eschew division and work together for Africa's sustainable development military security and economic stability;

(16) Conscious that the situation of African states presents opportunities and challenges and that these challenges must be tackled decisively and the opportunities harnessed with focus and determination,

Accordingly, resolves as follows:

On the Darfur Question

(17) Notes the report of the African Union Peace and Security Committee detailing the gruesome nature of the atrocity crimes committed in Darfur and the impunity with which they were committed.

(18) Notes the reports of the Prosecutor of the International Criminal Court to the United Nations Security Council underscoring the need for more robust support by the Security Council, United Nations Member States, and the Assembly of States Parties, and for redoubled support and cooperation to bring the perpetrators of these crimes to justice.

(19) Encourages all victims and persons who consider that their legal rights have been or are likely to be breached to take out legal proceedings against their perceived tortfeasors or agressors pursuant to the African Charter of Human and Peoples Rights or other international legal instruments.

(20) Calls upon the United Nations Security Council and the African Union to urgently provide security and protection to the civilians and victims of crimes against humanity in Darfur.

(21) Urges all African States, States Parties to the Rome Statute, and relevant international institutions to cooperate fully with the International Criminal Court and all other competent accountability mechanisms, including by executing arrest warrants, providing evidence, and ensuring non-refoulement of suspects.

On reparations

(22) ENDORSES the United Nations General Assembly resolution of 25 March 2026 declaring the enslavement of Africans as "the gravest crime against humanity" and calls upon all UN member states to implement its provisions fully, including the immediate and unconditional restitution of cultural property.

(23) ENDORSES the African Union's resolution on reparative justice and the 19-point reparations plan adopted at the 2026 Accra conference, and urges all African states to integrate these commitments into their national legal and policy frameworks.

(24) AFFIRMS that reparatory justice for Africa and people of African descent is a legal obligation, not a charitable gesture, and that it must include, at a minimum: (a) formal apologies at the head-of-state level; (b) comprehensive debt relief and cancellation for affected countries; (c) the establishment of a Global Reparations Fund; (d) restitution of looted cultural property and ancestral remains; (e) compensation for economic and environmental harm caused by resource exploitation; (f) climate justice financing; and (g) guarantees of non-repetition.

(25) AFFIRMS FURTHER that the participation of affected communities is a non-negotiable prerequisite for any restitution or reparation process, and that any attempt by neo-colonial states or other actors to exclude, sideline, or monopolize such processes on behalf of affected communities is illegitimate and contrary to international law and the principles of self-determination.

(26) CALLS UPON former colonial powers, European museums, private collectors, and other holders of looted African cultural property to: (a) engage in good-faith negotiations with affected communities for the return of stolen and looted artifacts; (b) provide full transparency regarding the provenance and location of such artifacts; (c) facilitate access for affected communities to their cultural heritage; and (d) desist from any attempts to monetize, retain, or assert "national character" over artifacts that rightfully belong to the communities from which they were stolen.

ON THE WAR IN EASTERN DEMOCRATIC REPUBLIC OF THE CONGO

(27) Strongly condemns the ongoing offensive by the Rwanda-backed M23/AFC armed group in eastern Democratic Republic of the Congo (DRC), and the documented involvement of Rwandan troops in active combat operations on Congolese territory, including the presence of an estimated 3,000 to 10,000 Rwandan soldiers in North and South Kivu provinces, which has been reported to the United Nations Security Council.

(28) Condemns the grave human rights violations and abuses committed in eastern DRC by all parties, including extrajudicial, summary and arbitrary executions, widespread conflict-related sexual violence targeting particularly women and girls, the abduction of over 130 patients from hospitals, forced recruitment of children, and attacks on schools and health structures, which may amount to war crimes and crimes against humanity.

(29) Condemns the illegal exploitation, smuggling and pillaging of Congolese natural resources, including gold, coltan and cobalt, from mining sites in Masisi and other territories, and the construction of a parallel economy in occupied areas, and calls for accountability for all actors involved in the illegal trade of conflict minerals.

(30) Calls upon all parties to immediately cease hostilities, protect civilians, and ensure safe, rapid and unhindered humanitarian access to populations in need, noting that over 5.8 million persons remain internally displaced, millions face acute food insecurity, and the humanitarian situation constitutes one of the most protracted and severe crises on the continent.

(31) Calls upon all parties, including the DRC Government, the M23/AFC, Rwanda, and regional and international mediators, to engage constructively in the Luanda Process, the Nairobi Process, and the African Union-led peace initiative to achieve a durable ceasefire, address the root causes of the conflict, and facilitate an inclusive political dialogue.

(32) Welcomes the case filed by the DRC against Rwanda at the International Court of Justice regarding decades of violence, and calls upon all parties to cooperate fully with the ongoing investigations of the International Criminal Court into crimes committed in eastern DRC.

(33) Notes the planned withdrawal of MONUSCO forces, including the South African contingent, by the end of 2026, and expresses concern regarding the impact of such withdrawal on civilian protection; the Association further takes note of the phased withdrawal of the SADC Mission in the DRC (SAMIDRC) and calls for a responsible transition that prioritises the protection of

civilians and ensures that the gains made by regional forces are not lost.

(34) Urges the DRC Government and all relevant stakeholders to engage in an inclusive national dialogue that addresses the root causes of the conflict, including issues of citizenship, land rights, and governance in the eastern provinces, with a view to achieving sustainable peace and reconciliation.

ON THE INTERNATIONAL CRIMINAL COURT AND THE POLITICISATION OF INTERNATIONAL JUSTICE

(35) Strongly condemns the imposition of sanctions by any State against judges, prosecutors, and personnel of the International Criminal Court (ICC), including recent sanctions imposed against ICC judges and prosecutors, which constitute an attack on the independence of the Court and the rule of law.

(36) Expresses serious concerns about the politicisation of the disciplinary process which led to the removal of the Prosecutor of the ICC Karim Khan in which the decision of independent judges was disregarded and substituted by a political process. African Bar Association calls on the ICC Assembly of State Parties reform the disciplinary procedures of the Court to guarantee fair procedures and the independence.

(37) Rejects all threats, sanctions, and political pressure directed against the ICC, its judges, its Prosecutor, and its staff, and condemns the politicisation of international justice and the targeting of Africa and African officials through selective or politically motivated prosecutions.

(38) Calls upon all States to respect the independence of the ICC and to refrain from any measures aimed at undermining its mandate, including threats of sanctions or retaliation against Court personnel.

(39) Urges all African States Parties to the Rome Statute to cooperate fully with the ICC, to execute arrest warrants, to provide evidence, and to uphold their obligations under international law.

(40) To monitor the election of new ICC judges in December 2026 and the appointment of a new Prosecutor, and to advocate for

transparent, merit-based processes free from political interference.

ON RATIFICATION OF THE MALABO PROTOCOL

(41) Calls upon all African Union Member States to ratify and domesticate the Protocol on Amendments to the Protocol on the Statute of the African Court of Justice and Human Rights (Malabo Protocol) without further delay.

(42) Notes that Angola has become the first African Union Member State to ratify the Malabo Protocol, and that fourteen other States are still required for its entry into force.

(43) Acknowledges concerns regarding the immunity provision for serving Heads of State and senior officials under the Malabo Protocol, and calls for constructive dialogue to ensure that the Court operates in accordance with the principle of equal application of the Rule of law .

(44) Emphasises that the African Court, once established, should complement national courts, special international courts, and the ICC in the fight against impunity for serious international crimes across the continent.

ON THE CRISIS IN SOUTHERN CAMEROONS

(45) Strongly condemns the ongoing violence in the North-West and South-West regions of Cameroon, including extrajudicial killings, arbitrary arrests and detentions, torture and ill-treatment, sexual and gender-based violence, attacks on schools, students, and aid workers, and the killing of civilians by both government forces and armed separatists.

(46) Calls for internationally mandated mediation to address the root causes of the Anglophone crisis, including historical grievances, marginalisation, and the demand for greater autonomy or federalism, in accordance with international law and human rights standards.

(47) Calls for the establishment of a comprehensive transitional justice mechanism to hold perpetrators of atrocity crimes accountable,

provide reparations to victims, and ensure non-recurrence, with the full participation of affected communities.

(48) Calls for unimpeded humanitarian access to populations in need in the North-West and South-West regions, where more than one million persons have been internally displaced and over 3,000 civilians have lost their lives.

ON XENOPHOBIA AND FAIR IMMIGRATION POLICIES

(49) Strongly condemns all acts of xenophobic violence, discrimination, and hatred against migrants, refugees, and asylum seekers across the African continent, including recent attacks in South Africa and the systematic abuse of migrants in Tunisia and the current attack targeting the Burundians in Nairobi -Kenya.

(50) Calls upon all African States to adopt fair, humane, and rights-based immigration policies that respect the dignity and rights of all persons, regardless of nationality or migration status.

(51) Condemns the practice of collective expulsions and pushbacks of migrants and refugees to territories where they face risk of persecution, torture, or inhuman treatment, in violation of the principle of non-refoulement.

(52) Calls for the enactment and enforcement of laws combating racial discrimination, xenophobia, and related intolerance, and for the prosecution of perpetrators of xenophobic violence.

ON TERRORIST ATTACKS IN THE SAHEL AND WEST AFRICA

(53) Strongly condemns the escalating terrorist attacks by al-Qaida-affiliated and Islamic State-affiliated groups, including Jama'at Nusrat al-Islam wal-Muslimin (JNIM) and the Islamic State Sahel Province (ISSP), across the Sahel and West Africa, which have resulted in thousands of civilian deaths and displacement.

(54) Supports the efforts of ECOWAS, the African Union, and affected States to combat terrorism and violent extremism, including the proposed activation of a 260,000-strong rapid deployment counter-terrorism brigade and the adoption of both kinetic and non-kinetic strategies.

(55) Calls for the protection of vulnerable populations, particularly children in traditional Islamic education systems who are at risk of manipulation by extremist networks, through reform, regulation, and modernisation of these systems while preserving their cultural and educational value.

(56) Emphasises that counter-terrorism measures must comply with international human rights law and international humanitarian law, and calls for accountability for violations committed by security forces in the context of counter-terrorism operations.

(57) Calls upon the United Nations, the African Union, and international partners to provide adequate, predictable, and sustainable financing for African-led peace support operations, including through the full implementation of Security Council Resolution 2719.

On Victoire Ingabire

(58) Unequivocally condemns the arbitrary detention of Ms. Victoire Ingabire Umuhoza and the ongoing violations of her rights to a fair trial, presumption of innocence, confidential legal assistance, freedom of expression and association, and humane treatment.

(59) Demands the immediate and unconditional release of Ms. Ingabire, in full compliance with Opinion No. 3/2026 of the UN Working Group on Arbitrary Detention.

(60) Calls upon the Rwandan Government to comply fully with its obligations under the African Charter on Human and Peoples' Rights, the International Covenant on Civil and Political Rights, and the decisions of the African Court on Human and Peoples' Rights and the UN Working Group on Arbitrary Detention.

(61) Urges the Rwandan authorities to respect the right of accused persons to counsel of their choice, including counsel from other East African Community Partner States, and to ensure the confidentiality of lawyer-client communications.

(62) To monitor the trial proceedings closely, to seek observer status or amicus participation as appropriate, and to engage the Rwandan authorities through diplomatic and professional channels

to secure the release of Ms. Ingabire and the protection of fair-trial standards.

(63) Commits to collaborating with national bar associations, the African Commission on Human and Peoples' Rights, and relevant United Nations mechanisms to ensure sustained international scrutiny of this case.

(64) Mandates the President of the African Bar association and the President of the Cape Verde Bar Association to call on the Acting President of the Republic of Cabo Verde to engage the government of the Republic of Rwanda on the situation of Victoire Ingabire with a view to ensuring that her arbitrary detention is stopped and that she has real opportunity to meet with and be represented by counsel of her choice.

On Human Rights

(65) Calls on African states to incorporate gender and vulnerability perspectives into security, justice and peacebuilding responses, with particular attention to women, children, displaced persons, persons with disabilities and communities disproportionately affected by conflict and insecurity.

(66) Calls for the strengthening of accountability and anti-corruption measures, recognising the relationship between corruption, weakened institutions, insecurity, terrorism financing and sustainable development.

(67) Calls for the promotion of people-centred approaches to security, recognising that sustainable security depends not only on enforcement capacity but also on trust, rights protection, participation and resilient communities.

(68) Calls for the promotion of responsible use of technology and stronger institutional capacity to respond to emerging security threats while safeguarding fundamental rights.

(69) Calls on African States to develop coherent, predictable and sustainable international partnerships that support African priorities and strengthen, rather than duplicate or replace, African institutions and initiatives.

(70) Calls for the strengthening of the engagement among the legal profession, governments, regional institutions, international organisations, civil society, academia and development partners, recognising the complementary responsibilities of these actors in protecting human rights and strengthening the rule of law.

(71) Commit to maintaining follow-up beyond the AFBA Annual Conference 2026, including opportunities for continued dialogue, partnerships and Human Rights Committee engagement on the issues identified during the sessions.

On The Transfer of ICTR/IRMCT Detained, Acquitted and Released Persons to Rwanda and Alternative Proposals

(72) Opposes the transfer of ICTR/IRMCT detained, acquitted and released perons currently held in the Republic of Benin and Republic of Senegal to the Republic of Rwanda.

(73) Opposes the transfer of ICTR/IRMCT archives to Rwanda. These archives contain records of testimonies of witnesses, victims and survivors under court protective measures decisions. The archives should be transferred to the UN Secretariat or to a neutral third State in order to make them available to the public in the long term, to preserve the legacy of the tribunals and the Mechanism for future generations.

(74) Calls upon the United Nations to terminate and declare null and void, based on Rwanda's persistent violations of Human Rights ;the Agreement signed on 4th March 2008 between the Government of Rwanda and the United Nations regarding enforcement of sentences imposed by ICTR which designated Rwanda as an Enforcement State, and AFBA calls for immediate suspension of any preparatory measures for a transfer to Rwanda.

(75) Supports the maintenance and reinforcement of the existing detention arrangements in the Republic of Benin (since 2009) and Republic of Senegal (since 2017), with adequate United Nations funding, as the simplest, most economical, and most rights-respecting solution, and as a priority to transfer the administrative control to the current host States, while maintaining IRMCT

judicial supervision, in accordance with paragraph 28 of report S/2025/787.

(76) Calls for an immediate, dignified, and lasting solution for persons held in the Republic of Niger, including relocation to a willing third State with clear legal status, effective international protection, or implementation of the 2021 settlement agreements with the Republic of Niger.

(77) Calls for the reconsideration, with due regard to the principle of non-retroactivity, of the admission-of-guilt condition introduced by the IRMCT Directive of 15 May 2020 for early release applications, in accordance with IRMCT Rule 126 governing early release conditions.

(78) Calls for the referral to the UN Working Group on Arbitrary Detention and the Special Rapporteur on Torture for independent opinions on the legal and human-rights implications of the proposed transfer. It further calls for the designation of a neutral third State with no connection to the context giving rise to the judgments, meeting the criteria of the Directive of 7 May 2025.

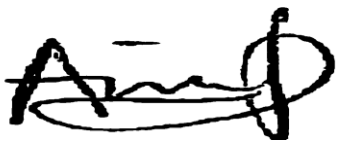
(79) Emphasises the human impact on innocent families, including elderly detainees' health risks, the severance of family links, and the situation of children and grandchildren deprived of contact with their parents and grandparents.

On Aviation

(80) Recalling its several resolutions at the 2025 Accra Annual Conference of the Association, commits to establish a working group to see to the implementation of the several treaties and agreements put in place to ease the free movement of persons around and in Africa and to liaise with governments, government agencies and any person charged with or found instrumental to the ease of air travel around Africa.

Dated at Sal this 24th Day of September 2026.

High Chief Ibrahim Eddy Mark
President



Dr Prudence Acirokop
Secretary-General