## Table 1: Comparative chart of the arbitration rules of the most active institutions in Africa

	London Court of International Arbitration (LCIA) Rules 2014	International Chamber of Commerce (ICC) Rules 2012 as amended effective 2017	The Arbitration Foundation of Southern Africa (AFSA) Rules 2017	The Lagos Court of Arbitration (LCA) Rules 2018	Kigali International Arbitration Centre (KIAC) Rules 2012	The Cairo Regional Centre for International Commercial Arbitration (CRCICA) Rules 2011	MCCI Arbitration and Mediation Center (MARC) Rules 2018	Nairobi Centre for International Arbitration (NCIA) Rules 2015
Default number of arbitrators	Sole arbitrator (Article 5.8)	Sole arbitrator (Article 12.2)	As agreed by the parties or as determined by the Secretariat. (Rule 15)	Sole arbitrator (Article 8)	Sole arbitrator (Article 12)	Three arbitrators (Article 7.1)	As determined by the Court (Article 6.1)	Sole arbitrator (Rule 7.1)
Time limit for arbitrator challenge	Within 14 days of formation of tribunal or becoming aware of the grounds for challenge. (Article 10.3)	Within 30 days of notice of appointment or becoming aware of the grounds for challenge. (Article 14.2)	Within 15 days of becoming aware of the grounds for challenge. (Rule 19.3)	Within 15 days of notice of appointment or becoming aware of the grounds for challenge. (Article 15.4)	Within 14 days of notice of appointment or becoming aware of the grounds for challenge. (Article 18)	Within 15 days of notice of appointment or becoming aware of the grounds for challenge. (Article 13.3)	Within 15 days of notice of appointment or becoming aware of the grounds for challenge. (Article 12.2)	Within 15 days of the formation of the Arbitral Tribunal or on becoming aware of the grounds for challenge. (Rule 11.3)
Availability of emergency arbitrator	Available. (Article 9B)	Available. (Article 29 and Appendix V)	Silent <sup>12</sup> .	Available. (Article 12.1)	Available. (Article 34)	Silent.	Available. (Article 23 and Appendix 4)	Available. (Rule 28.1)
Expedited procedure	Available. (Article 9A)	Available if parties agree or if the amount in dispute does not exceed US\$2 million. (Article 30 and Appendix VI)	Available. (Rule 16.8).	Available. (LCA Expedited Arbitration Rules 2018)	Silent.	Silent.	Available if parties agree or if the amount in disoute does not exceed 25 million MUR. (Article 20.1)	Exoedited formation of the Arbitral Tribunal available. (Rule 10.1)
Interim measures	Available (Article 25.1)	Available. (Article 28.1).	Available. (Rule 33.1)	Available. (Article 28.1)	Available. (Article 33)	Available. (Article 26.1)	Available. (Article 23)	Available. (Rule 27.1)
Time limit for issuing award to the parties	No time limit.	Within 6 months from date of the last signature of the Terms of Reference. (Article 31)	No time limit. (Rule 39).	Silent <sup>13</sup> .	No time limit. (Article 38)	Silent.	Silent.	Within 3 months from the date of close of hearing. (Rule 29.1)
Cost allocation	Tribunal has discretion, but given the general principle that costs should reflect parties' relative success and failure. (Article 28.4)	Tribunal has discretion, taking into account all the relevant circumstances. (Article 38.4)	Tribunal has discretion. (Rule 42.2)	The costs of the arbitration shall in principle be borne by the unsuccessful party, subject to the tribunal's discretion. (Article 44.1)	Tribunal has discretion, taking into account all the relevant circumstances. (Article 42)	The costs of the arbitration shall in principle be borne by the unsuccessful party, subject to the tribunal's discretion. (Article 46.1)	Tribunal has discretion, taking into account all the relevant circumstances. (Articles 32.2 & 32.3)	The costs of the arbitratin shall reflect the parties' relative success or failure, except where the tribunal considers the principle inappropriate. (31.7)