

*Soft Landing Recovered Space
and Priority*



<https://bit.ly/4eFxuiz>

AFPUB-2026-IPv4-001-DRAFT02



AFPUB-2026-IPv4-001-DRAFT02

3.1 Staff Interpretation and Understanding of the Proposal

The policy proposals map a way forward on how the recovered IPv4 space should be managed by being cleaned and returned to the available pool, where the resources can be delegated under the prevailing Soft Landing policy rules.

It further acknowledges that the Soft Landing policy phases are irreversible, such that no phase 1 conditions can be applied in phase 2, and the current phase conditions shall apply to all available IPv4 space, space reserved for future use as per the policy statement and recovered space, unless another policy that states otherwise is adopted.

In practice, AFRINIC shall maintain the quarantine period of its recovered pool to 12 months and may adjust to 6 months should the need arise. The cleaned up addresses will then be moved to the available pool. In the event that AFRINIC is unable to satisfy a request from its available pool, the reserved /12 prefix will then be brought to the available pool.

The proposal also introduces a positive change by removing some obsolete sections of the CPM (specifically 5.5.1.2.1, 5.5.1.4.1 and 5.6.3), thereby removing one of the major pain points to the current CPM since these pre-softlanding sections were conflicting with some profound conditions of the softlanding (5.4.3.2 and 5.4.6.1 in particular).

It also corrects the projected period of needs from 12 months to 8 months in sections 5.5.1.9 and 5.5.1.13.3.2

In the case that any other condition still conflicts with the softlanding conditions, the Soft Landing section takes precedence.

AFPUB-2026-IPv4-001-DRAFT02

- **Benefit to AFRINIC:** The policy clarifies the ambiguities that surrounded how the recovered space shall be handled.
- **Impact on Resource Members:** The policy will improve the readability of the CPM since conflicting sections will be removed

3.2 Clarity of Policy Text

None

3.3 Areas of Impact

3.3.1 Interaction with Existing CPM

The policy interaction with CPM Section 5.4.7.2 shall invalidate the “Preserve” state of the /12 prefix and make it available.

3.3.2 Interaction with Other DPPs Under Discussion

Removing sections 5.5.1.2.1, 5.5.1.4.1 and 5.6.3 helps the integration of other policy proposal AFPUB-2026-ipv4-002-DRAFT01

3.3.3 Impact on IP Numbers Registry Systems

AFPUB-2026-IPv4-001-DRAFT02

3.3.4 Member Services Operations

- **Procedures:**
 - Introduce an automated cleanup and monitoring tool.
- **Website & Communications:** Web content updates, FAQs, announcement plan.

3.3.5 IT

None. Existing systems will be used

3.4.6 HR

None. Existing skillsets will be used

3.4.7 Legal

No legal issue

3.4.8 Finance

None. subject to Existing skillsets be used

4. Recommendations on Policy Wording

None

5. Staff Clarification Requests

None

6. Implementation Plan

- **AFRINIC** will require 6 months to implement the automated workflow to enhance the monitoring and clean-up procedures.

*PDP Working Group (WG)
Guidelines and Procedures*



AFPUB-2026-GEN-001-DRAFT01

<https://bit.ly/4vqVbll>

AFPUB-2026-GEN-001-DRAFT01

3.1 Staff Interpretation & Understanding of the Proposal

The proposal obsoletes sections 3.3 & 3.5 and amends section 3.4.4 of the AFRINIC CPM.

Purpose & scope — The document establishes formal guidelines for the Policy Development Working Group (PDWG), defining how AFRINIC's open forum for Internet number resource policy operates, including roles, procedures, and decision-making.

PDWG co-chairs — Two volunteer co-chairs are appointed for staggered two-year terms by working group consensus. They manage the working group, moderate the mailing list, chair PPM sessions, and guide proposals through the PDP.

Number Council (NC) — Composed of the two co-chairs, two community-elected NRO NC members, and one board-appointed NRO NC member. The NC is chaired by a community-elected NRO NC member and decides by majority.

NRO NC elections — Community-elected NRO NC members are chosen at PPMs via online voting. Eligible voters include AFRINIC member organisations (one vote each via corporate/authorised contacts) and qualifying registered PPM attendees from the service region. Staff cannot vote.

Co-chair eligibility & appointment — Candidates must reside in the AFRINIC service region, be active on the mailing list, and have attended at least 4 of the last 6 PPMs (including one in person). Appointment is by consensus at the PPM; ties are broken by drawing lots.

AFPUB-2026-GEN-001-DRAFT01

3.1 Staff Interpretation & Understanding of the Proposal

The proposal obsoletes sections 3.3 & 3.5 and amends section 3.4.4 of the AFRINIC CPM

6. Co-chair recall & resignation — A co-chair can be recalled for missing two consecutive PPMs without reason, or via a written request supported by 10 persons from 10 different organisations. The Recall Committee (same as the Appeal Committee) investigates and issues a binding decision within 4 weeks.

7. Meeting & discussion management — Co-chairs may restrict participation (not attendance) at PPMs to ensure forward progress, and can reject input that is old, minor, out of scope, or untimely. Disruptive individuals may have posting privileges suspended for up to 30 days after warnings.

AFPUB-2026-GEN-001-DRAFT01

3.1 Staff Interpretation & Understanding of the Proposal

8. Appeal & conflict resolution — Three bodies handle disputes: the Appeal Committee (posting suspensions and general conflicts), the Recall Committee (co-chair removal), and the Number Council (appointment disputes). Appeals require support from 3 working group participants and must be filed within two weeks. Decisions are final and binding.

9. Consensus-based decisions — All working group decisions, including co-chair appointments and policy outcomes, are made by consensus as defined in the PDP.

10. Policy ratification & petition mechanism — Co-chairs recommend consensus policies to the AFRINIC Board for ratification. If the Board fails to ratify within 60 days without reasons, a PDWG member can petition for automatic ratification, provided the petition is supported by at least 15 registered contacts from distinct members across at least 3 AFRINIC sub-regions, and a fresh staff analysis finds no new issues.

AFPUB-2026-GEN-001-DRAFT01

Legal Assessment

Comprehensive legal assessment has been provided.

Policy Liaison Inputs

1. Instead of 2 PDP Co-chairs, we recommend 3 co-chairs with a quorum of 2 at any PPM for the following reasons :-

a) Balances the workload of the co-chairs in regard to the Policy Proposals

b) Ensures continuation of the PDP in the event that one co-chair is unable to attend a PPM or resigns or is recalled

2. 3.3.2 Responsibilities of PDWG co-chairs

The section is silent as to how the co-chairs shall handle competing or overlapping policy proposals being tabled for discussion in a same period

AFPUB-2026-GEN-001-DRAFT01

3. 3.3.7 Individual Behaviours

The AFRINIC Code of Conduct AFRINIC Community Code of Conduct provides the guidelines for enforcing the code of conduct .

4. Where members are mentioned , the authors to clarify if they mean Resource Members , Registered Members or Associate Members
5. Consensus - A definition of consensus/rough consensus is recommended as it will also serve as a guiding principle to newcomers in the PDWG
6. Availability of eligible persons for the Number Council

ASO-AC representatives elected by the community will have additional responsibilities on the appeal and recall committees and past co-chair will join the Appeal Committee

These are volunteer roles and may become less appealing due to 'extra' workload.

Amendment of Utilisation in Soft Landing

*Soft Landing Recovered Space
and Priority*



<https://bit.ly/4eFxuiz>

AFPUB-2026-IPv4-002-DRAFT02

3.1 Staff Interpretation & Understanding of the Proposal

The 90% threshold requirement remains the underlying condition to assess eligibility for receiving additional IPv4 resources from AFRINIC. However, some technical constraints deem it necessary to override this threshold requirement. Operational constraints shall not be considered as justification to override this threshold requirement.

- **Benefit to AFRINIC:** Hostmasters will have a clearly documented policy for guidance when dealing with such cases.
- **Impact on Resource Members:** Members will be able to use the policy if faced with such technical constraints while having used less than 90% of their allocations and assignments.

3.2 Clarity of Policy Text

- Overall, the proposal is clear and easy to understand.

AFPUB-2026-IPv4-002-DRAFT02

3.3 Areas of Impact

3.3.1 Interaction with Existing CPM

Policy will update Section 5.4.6.1 of the CPM

3.3.2 Interaction with Other DPPs Under Discussion

No overlaps detected

3.3.3 Impact on IP Numbers Registry Systems

None

AFPUB-2026-IPv4-002-DRAFT02

3.3.4 Member Services Operations

- Procedures:

MS Procedures will be updated to include policy provisions.

The procedure will also have to evolve in a way that fraudulent requests are identified, and there is no abusive use of the policy section

- Website & Communications: Updates to FAQs.

3.4.5 IT

- No impact

3.4.6 HR

- No Impact.

3.4.7 Legal

- No legal issue

3.4.8 Finance

- No impact

AFPUB-2026-IPv4-002-DRAFT02

4. Recommendations on Policy Wording

- None

5. Staff Clarification Requests

- None

6. Implementation Plan

Proposal can be implemented within the prescribed timelines in the CPM.

6.1 Timeline

- Within 30 days of date of ratification

*Require newly created AS-SETs to
have hierarchical names*



AFPUB-2026-ASN-001-DRAFT02

<https://bit.ly/4xPNx6g>

AFPUB-2026-ASN-001-DRAFT02

3.1 Staff Interpretation & Understanding of the Proposal

Problem context. AS-SET names are not currently required to be unique across authoritative IRR databases, including the five IRR databases operated by the Regional Internet Registries (RIRs). Where name collisions occur, resolving them is extremely difficult because network operators do not own specific AS-SET names. Although industry practice is to choose a name that clearly identifies the associated network (e.g., "AS-AMAZON" for Amazon), any name may be used, making AS-SET names inherently ambiguous. If AS-SET name squatting is carried out intentionally or maliciously, the affected party has limited recourse to have the squatted AS-SET removed, particularly when it exists in a different IRR database.

What the proposal mandates. To address this, the proposal mandates that any newly created AS-SET in the AFRINIC WHOIS database must use a hierarchical name as defined by RFC 2622 Section 5. Practically, the name must contain a colon, start with the holder's ASN as the first element (e.g., AS12345:AS-CUSTOMERS), followed by an AS-SET element beginning with "AS-", with optional further colon-delimited elements. The rule applies only at creation time: existing non-hierarchical AS-SETs are not to be renamed, and edits to existing objects must not force renaming. Other set types (e.g., route-sets) are explicitly excluded.

AFPUB-2026-ASN-001-DRAFT02

How this solves the problem. Hierarchical naming makes AS-SET names unique because the AS number at the front is uniquely assigned by the RIR. This also authorises the user of the AS-SET, since only the operator of that AS number can create hierarchical AS-SET names starting with it — the creator is required to have the authentication details of their AS Number. Furthermore, contact details for the AS-SET will be apparent from the WHOIS database, enabling traceability back to the responsible operator.

- **Assumptions:** Enforcement is limited to authoritative AFRINIC IRR creation workflows; mirroring/resolver behaviour is out of scope. Validation will occur server-side and in any exposed create-forms/APIs. No retroactive clean-up or bulk migration is intended.
- **Benefit to AFRINIC:** Reduced risk of global name collisions and squatting; clearer authorisation linkage between ASNs and sets; fewer misconfigurations propagated via resolvers; alignment with other RIR practices (APNIC, RIPE, LACNIC; ARIN accepted request), improving ecosystem consistency.
- **Impact on Resource Members:** New AS-SET creators must follow hierarchical syntax; minor learning curve and potential updates to automation/tooling that currently assume flat names. Existing non-hierarchical sets remain valid and editable, limiting disruption. Members may need guidance and examples to avoid creation failures.

AFPUB-2026-ASN-001-DRAFT02

3.2 Clarity of Policy Text

Can the author consider the following text for the purpose of clarity?

7.8 AS-SET

7.8.1 Any AS-SET created within the AFRINIC Whois Database shall, at the time of its creation, bear a hierarchical name.

7.8.2 For the purposes of this provision, the term “hierarchical name” shall have the meaning ascribed to it in Section 5 of RFC 2622 and shall comply with the following requirements:

- **(a) the name shall contain at least one colon (:) character;**
- **(b) the first element of the name shall consist of an Autonomous System Number (“ASN”);**
- **(c) the second element of the name shall consist of an AS-SET name prefixed with “AS-”; and**
- **(d) any subsequent element of the name may consist of either an ASN or an AS-SET name.**

AFPUB-2026-ASN-001-DRAFT02

7.8.3 The present provision shall apply exclusively to AS-SETs and shall not extend to other set types, including but not limited to route sets.

7.8.4 Existing AS-SETs bearing non-hierarchical names shall not be subject to mandatory renaming, in view of the substantial risk of data inconsistencies and the absence of a reliable programmatic method to determine the ASN associations of such existing AS-SETs within the AFRINIC Database.

7.8.5 Any AS-SET existing as at the date of commencement of this provision and bearing a non-hierarchical name may continue to retain and operate under such name.

AFPUB-2026-ASN-001-DRAFT02

7.8.6 The modification or editing of an existing AS-SET shall not impose upon the maintainer any obligation to rename the relevant AS-SET so as to conform to the hierarchical naming requirements set out herein.

7.8.7 Exceptions for the creation of hierarchical names may be granted where necessary. AFRINIC shall document the reason for any exception.

Ambiguities/clarifications:

- None

3.3 Areas of Impact

3.3.1 Interaction with Existing CPM

No overlaps or conflicts with current CPM sections and any policies awaiting ratification or implementation have been identified.

3.3.2 Interaction with Other DPPs Under Discussion

None

AFPUB-2026-ASN-001-DRAFT02

3.3.3 Impact on IP Numbers Registry Systems	
System	Impact
WHOIS	The WHOIS systems will require software changes to restrict the creation of non-hierarchical AS-SETs through all its touch points.
RDAP	Will reflect the change on whois for queries on as-sets
MyAFRINIC (Hostmaster, Member Portal, Transfer Tool)	The MyAfrinic IRR interface will require software changes to restrict further creation of non-hierarchical AS-SETs
NetSuite	None
NMRP	None
RPKI	None

AFPUB-2026-ASN-001-DRAFT02

3.3.4 Member Services Operations

- Procedures: There will be minimal impact on the current processes and procedures as the hierarchical sets are already functional in the WHOIS database

3.3.5 IT

- None. Will be implemented on WHOIS and myafrinicv2 systems.

3.3.6 HR

- Existing skill sets will be used for the implementation

3.3.7 Legal

- No legal issue

3.3.8 Finance

None, subject to existing skill sets being used for implementation

AFPUB-2026-ASN-001-DRAFT02

4. Recommendations on Policy Wording

- See 3.2 above

5. Staff Clarification Requests

- None

6. Staff Observations

We note the exception highlighted in 7.8.6 that could allow restoration of deleted objects. However, we feel that such recalls may introduce operational loopholes, and it may also reduce the effective objective for the policy in general. In the instance that an unintended deletion happens, the affected members may take the opportunity to create aligned AS-SETs.

7. Implementation Plan

Policy can be implemented as written.

The CPM mandates that the implementation date should be less than six months after the end of the Last Call unless a waiver is requested.

Since at present, all resources have been channelled to the myafrinic v2 project which expected to go live by 15 November 2026, the implementation of this policy proposal shall be prioritised once the myafrinicv2 implementation is concluded.

*IPv6 as a criteria in IPv4 Soft
Landing*



AFPUB-2026-v6-001-DRAFT02

<https://bit.ly/4eFyGCz>

AFPUB-2026-v6-001-DRAFT02

Proposal Overview: IPv6 Adoption & IPv4 Soft-Landing

- The proposal maintains the current soft-landing approach for IPv4 requests during exhaustion while adding new eligibility conditions tied to IPv6 adoption.
- New and existing members requesting IPv4 must also request, justify, and satisfy IPv6 allocation criteria, including a coherent deployment plan.
- For members already holding IPv6, additional IPv4 requests trigger a retrospective review of their IPv6 needs and utilization.
- Introduces measurable deployment expectations based on the top 25 IPv4 traffic destinations that are IPv6-enabled.
- Minimum IPv6 compliance thresholds: 25% within 12 months, 50% within 24 months, and 75% within 48 months.
- Failure to meet eligibility or follow the deployment plan results in IPv4 ineligibility and may be treated as a policy breach.

AFPUB-2026-v6-001-DRAFT02

Benefit to AFRINIC

The proposal aims to encourage concrete IPv6 deployment rather than passive IPv6 holdings, and introduces stronger accountability for organisations seeking scarce IPv4 resources during exhaustion. It may support AFRINIC's broader policy and stewardship objectives by linking remaining IPv4 access to demonstrated IPv6 transition intent.

Impact on Resource Members

- Members without immediate IPv6 deployment plans would be required to justify IPv6 resources and provide additional operational evidence before receiving IPv4.
- Creates a more demanding request process, especially for members with limited IPv6 capability, expertise, or infrastructure constraints.
- May disproportionately affect smaller operators (e.g., WISPs) due to device compatibility, commercial realities, or technical readiness.
- Staff considers that this may create tension with CPM fairness objectives where justified applicants are denied IPv4 due to practical barriers to IPv6.

AFPUB-2026-v6-001-DRAFT02

3.3 Clarity of Policy Text

The proposal introduces meaningful implementation expectations, but several parts require clarification before reliable and consistent operational enforcement is possible.

- It is unclear whether the retrospective evaluation of already-issued IPv6 should assess both the original stated need and actual deployment progress over the initial 12-month period.
- The policy requires requesters to satisfy IPv6 eligibility criteria under sections 6.5.1.1.3, 6.5.1.1.4, and 6.8.2.2.d, but it does not clearly address the interaction with CPM section 6.4.4, which explicitly allows existing IPv4 service providers to justify larger IPv6 requests based on present IPv4 customers transitioning to IPv6.
- The phrase requiring a “coherent IPv6 deployment and addressing plan” is operationally significant, but the standard for coherence is not defined.
- The mechanism for measuring the top 25 IPv4 traffic destinations, validating which are IPv6-enabled, and assessing progress against the percentage thresholds is not specified.
- The proposal does not state what evidence is acceptable to demonstrate compliance, partial compliance, or justified delay in deployment.
- Specific CPM and procedural touchpoints requiring clarification include section 6.4.4 and the IPv6 eligibility provisions in sections 6.5.1.1.1 through 6.5.1.1.4 and 6.8.2.2.d.

AFPUB-2026-v6-001-DRAFT02

3.4 Areas of Impact

3.4.1 Interaction with Existing CPM

- **CPM 6.4.4:** The proposal appears to overlook the existing provision that allows current IPv4 customer bases to support justification for larger IPv6 requests in transition scenarios.
- **CPM 6.5.1.1.1 to 6.5.1.1.4:** These LIR-related IPv6 qualification clauses become directly relevant to IPv4 eligibility under the proposal, creating a tighter policy coupling between IPv4 exhaustion handling and IPv6 allocation conditions.
- **CPM 6.8.2.2.d:** End-user IPv6 qualification also becomes a gating condition for IPv4, expanding the operational scope of IPv6 evaluation.

This interaction materially changes how staff would assess IPv4 requests during exhaustion by making IPv6 readiness and deployment evidence part of the decision path.

3.4.2 Interaction with Other DPPs Under Discussion

No direct interaction with other DPPs under discussion has been identified at this stage.

AFPUB-2026-v6-001-DRAFT02

3.4.3 Impact on IP Numbers Registry Systems

MyAFRINIC (Hostmaster, Member Portal, Transfer Tool)

Workflow and user-interface changes will be required to support linked IPv4 and IPv6 request handling, capture deployment and addressing plans, trigger retrospective reviews, and generate internal notifications or compliance tasks.

NetSuite

Billing and integration updates may be required depending on whether simultaneous IPv4 and IPv6 evaluation or additional review steps affect membership and resource processing flows.

NMRP

Process updates will be required to reflect new resource request criteria and retrospective review conditions.

AFPUB-2026-v6-001-DRAFT02

3.4.4 Member Services Operations

- **Procedures:** The Member Services IPv4 and IPv6 resource evaluation procedures will require revision. Retrospective evaluation of previously allocated or assigned IPv6 resources, together with review of deployment plans and compliance evidence, will add significant workload and complexity.
- **Contractual Agreements:** No contractual updates have been identified from the current text.
- **Website & Communications:** Public web content, process guidance, FAQs, and implementation communications will need updates. Members will need clear explanations of new evidence requirements, review triggers, and the consequences of non-compliance.

3.4.5 IT

IT changes are expected primarily in MyAFRINIC and related internal workflow tooling. The request flow would need to support simultaneous or linked IPv4 and IPv6 submissions, structured capture of deployment-plan information, review checkpoints, and internal status tracking. Depending on implementation choices, IT may also need to support reminder notifications, compliance milestone tracking, and auditable decision reco

AFPUB-2026-v6-001-DRAFT02

3.4.6 HR

The proposal is likely to require additional staff capacity and targeted training, particularly for Hostmasters involved in evaluating request justification and deployment evidence. Training would need to cover the new policy logic, interpretation standards, evidence assessment, and consistent handling of retrospective reviews. If the expected case volume increases materially, additional recruitment may be required.

3.4.7 Legal

No legal issue.

3.4.8 Finance

Financial impact is expected from staff training, and potentially increased operational headcount. Ongoing costs may include additional review time per request, and member support effort. A detailed cost estimate would depend on the final policy wording and the level of automation required.

4. Recommendations on Policy Wording

Staff recommends that the deployment-plan compliance details be moved to the relevant IPv6 sections of the CPM rather than being introduced indirectly through the IPv4 soft-landing context. This would improve structural clarity, reduce ambiguity during evaluation, and better align the operational obligations with the policy sections that already govern IPv6 qualification.

Additional wording improvements should explicitly define:

- what constitutes a coherent IPv6 deployment plan;
- how retrospective review is to be conducted for existing IPv6 holders;
- what evidence is required to show progress against the 12-, 24-, and 48-month thresholds;
- how section 6.4.4 should be applied when existing IPv4 infrastructure is part of the IPv6 justification; and
- what operational consequence follows from partial compliance, justified delay, or non-compliance.

AFPUB-2026-v6-001-DRAFT02

5. Staff Clarification Requests

The following clarification is requested from the DPP authors :

- Current IPv6 demand is generally assessed over a 12-month period, with a minimum allocation of /32 and minimum assignment of /48. In many cases, these minimum amounts are already sufficient for operators in the region. How should AFRINIC staff assess the coherence of a member's position when only a minimal amount of initially issued IPv6 space has been used after 12 months, but the member is requesting additional IPv4?
- Should retrospective review test both the original IPv6 justification and the member's actual deployment performance against the stated plan?
- What evidence source should be used to determine the requester's top 25 IPv4 traffic destinations and whether each destination is IPv6-enabled?
- How should AFRINIC treat cases where deployment delays are caused by upstream dependencies, customer equipment limitations, or market constraints outside the member's direct control?

6. Implementation Plan

6.1 Timeline

A high-level implementation period of approximately 6 months is anticipated from ratification to production readiness.

AfriNIC Policy Compliance



AFPUB-2026-GEN-002-DRAFT01

*[https://afrinic.net/afpub-2026-gen-002-draft01#im-
pact](https://afrinic.net/afpub-2026-gen-002-draft01#impact)*

AFPUB-2026-GEN-002-DRAFT01

Staff Interpretation & Understanding of the Proposal

The proposal introduces a new CPM section establishing a Policy Compliance Dashboard. It requires AFRINIC to monitor member compliance with CPM resource policies on a periodic and automated basis, notify members when non-compliance is detected, escalate persistent non-compliance to staff, and define procedures for service withholding, revocation, or member closure. It also introduces a Board-level exception mechanism for cases involving critical internet infrastructure.

This would allow AFRINIC to exercise authority to act on non-compliance under the RSA and the Bylaws. This proposal fills that gap at the policy level.

AFPUB-2026-GEN-002-DRAFT01

System

MyAFRINIC (Hostmaster, Member Portal, Transfer Tool)

Impact

- A new compliance dashboard must be built showing each member their compliance status per resource policy. Members see their own data only, authorised staff see all.
- The system must run automated checks against WHOIS contact accuracy, abuse-c validity, route object consistency, RPKI ROA coverage where relevant, and reverse DNS requirements. These checks must feed into the dashboard state automatically.
- The dashboard must track compliance states per member per finding. State for each one to be tracked example(Policy compliant, First notice sent, 2nd notice sent, Remediation in Progress, Escalated, Closed) Every state transition must be logged with timestamp for audit purposes.
- Automated email notifications to members and staff must be triggered by state changes.

AFPUB-2026-GEN-002-DRAFT01

3.3.4 Member Services Operations

- Procedures: New procedure for monitoring and actioning on non-conformance
- Website & Communications: Web publication of the notification and service withholding procedure

3.3.5 IT

- Implementation on existing systems

3.4.6 HR

- Recruitment of new staff will be required due to the workload introduced that will require Hostmasters work with members to overcome the non-compliances and ensuring revocation of resources are minimal.

AFPUB-2026-GEN-002-DRAFT01

Legal

Legal Issues of the Draft Policy Proposal

The main and substantive legal issues of this present draft policy proposal are as follows: Delegation of Powers to Staff

Several clauses leave substantive matters to be determined later by staff. Examples include:

- "Persistent non-compliance ... need to be defined by the Staff"
- "The Staff should define and publish a specific procedure"
- "Specific rules should be defined"

Such an approach creates a legal uncertainty problem because while the draft policy itself establishes obligations and potential sanctions, it leaves essential elements undefined, such as what, e.g., constitutes persistent non-compliance.

AFPUB-2026-GEN-002-DRAFT01

Lack of Provision Concerning Due Process

Having regard to the principles of legal certainty and predictability, the draft proposal does not provide sufficient or adequate procedural safeguards. Consequently, as presently drafted, it may expose AFRINIC to allegations of procedural unfairness, arbitrary decision-making, and unequal treatment of members.

Conflict with Existing RSA Provisions

The proposal repeatedly refers to the RSA. However, the legal relationship is governed primarily by contract. Therefore, I take it that the intent of the authors is to merely operationalise existing RSA rights and not to create new contractual remedies. The latter could create enforceability issues. Hence clarity is required.

AFPUB-2026-GEN-002-DRAFT01

Board Powers in Clause 6

The proposed paragraph is drafted in overly broad and vague terms, making it difficult to discern the specific issue or problem that it seeks to address.

In particular, the proposed exception reads - "the AFRINIC Board may take special measures".

Furthermore, there are essential terms that have been left undefined such as:

- "special measures"
- "essential strategic infrastructure"
- "political instability"
- "exceptional situations"

From a governance perspective, such wording may be criticised for granting discretionary powers that are insufficiently constrained.

AFPUB-2026-GEN-002-DRAFT01

Privacy and Data Protection

The proposal contemplates automated compliance reviews and compliance dashboards. Yet it is silent on the following:

- What member data will be collected and processed;
- How compliance determinations will be made;
- Whether third-party data sources are used;
- Retention periods;
- Accuracy verification; and
- Members' rights to challenge data.

AFPUB-2026-GEN-002-DRAFT01

Risk of Conflating Objective Metrics with Policy Compliance

The proposal stands to be grounded on the premise that compliance can be objectively measured. It is apposite to recall that many AFRINIC policies involve qualitative assessments, such as:

- Justification of needs;
- Proper resource utilisation; and
- Documentation requirements.

Accordingly, an automated dashboard may incorrectly suggest that all policy compliance can be reduced to objective metrics. Therefore, the proposal should distinguish between objective compliance indicators and matters requiring human assessment.

AFPUB-2026-GEN-002-DRAFT01

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- Documentation requirements.

Accordingly, an automated dashboard may incorrectly suggest that all policy compliance can be reduced to objective metrics. Therefore, the proposal should distinguish between objective compliance indicators and matters requiring human assessment.

AFPUB-2026-GEN-002-DRAFT01

In the circumstances, the recommended course of action would be to limit the policy to establishing the principle of compliance monitoring, while leaving investigations, sanctions, appeals, and revocations for separately adopted, transparent operational procedures and contractual instruments that expressly incorporate due-process safeguards.

AFPUB-2026-GEN-002-DRAFT01

4. Recommendations on Policy Wording

- Limit the policy wording to compliance monitoring and transparency. Redraft the proposal so that the CPM establishes the principle, scope, and member-facing purpose of the Policy Compliance Dashboard, while avoiding language that creates new enforcement powers beyond the RSA and AFRINIC's existing contractual framework.
- Replace open-ended delegation to staff with defined operational procedures. Where the draft says that staff "should define" persistent non-compliance, special rules, or procedures, use wording that requires AFRINIC to publish transparent operational procedures approved through the appropriate governance process before enforcement actions are applied.
- Clarify the relationship with the RSA and Bylaws. State that the dashboard and related notices operationalise existing rights and obligations under the RSA, Bylaws, and applicable policies, and do not create new contractual remedies unless those remedies are expressly incorporated through the appropriate contractual process.
- Phase implementation to reduce operational and user impact. Recommend a staged rollout beginning with visibility-only reporting, followed by member notifications, staff review workflows, and only later enforcement-related steps once systems, procedures, staffing, and communications are ready.

