**ADOPTION OF CHILDREN IN CAMEROON: A BLEND OF THE PROCEDURES BEFORE THE CIVIL AND COMMON LAW COURTS OF CAMEROON**

**BY**

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**ABSTRACT**

Adoption is a process that provides comfort and relief to potential parents who are unable to conceive, as well as a God-given opportunity for disadvantaged children to grow up in a stable and dependable home to secure their education and general well-being. Most countries have adopted a law on adoption as well as are party to different bilateral and multilateral conventions. Cameroon on its part does not have any stringent law on adoption matters except when recourse is made to received English and French laws owing to the colonial past of the State. This presents a serious problem in understanding the procedure for adoption in Cameroon as courts on the two divides of the country and especially in Anglophone Cameroon continue to make use of different pieces of legislation. This article therefore sets to discuss the procedure for adoption common to the courts of the civil and common law jurisdictions of Cameroon. Findings indicate that no matter the form of adoption wherever it is sort, the paramount concern of the courts is the welfare of the child to which unperturbed consent of either parties must be given for adoption to be granted. Cameroon is also encouraged to ratify the 1993 Hague Convention as most adoptions made in Cameroon are by foreigners.

**INTRODUCTION**

Adoption is a legal process in which a child becomes legally attached to a parent to whom he or she is not biologically related. This is a common practise in certain high-income countries. The acceptance of adoption does not depend just on the level of education but also on the socio-economic status. In addition, social beliefs constitute a non-negligible influence on attitude towards adoption.[[1]](#footnote-1)

Following World War II, there was a huge increase in adoption worldwide. The challenge of finding acceptable homes and responsible tutelage for the innumerable orphans left by the conflict emphasised the need for the creation of a suitable legal organisation. For most countries in Europe the answer was sought in the heretofore little-used institution of adoption.[[2]](#footnote-2) Adoption was commonly performed in Cameroon before and after independence, according to local customs and traditions.

In Cameroon, child abandoning is on the rise. The problem is the outcome of unrestrained sex among adolescents, parental irresponsibility and poverty against a backdrop of diminishing ancestral bonds of solidarity, which, in recent times, has deteriorated with the impact of HIV/AIDS and the problem of child trafficking and slavery. Over 300,000 orphans and vulnerable youngsters are at risk of being abandoned by their families.[[3]](#footnote-3) This is one of the issues expressed in Cameroon’s 1996 constitution, which states in the preamble that everyone has the right to a family.[[4]](#footnote-4)

As the number of children in Cameroon without parents or families grows, two types of alternative care are currently available: interim alternative care and permanent alternative care. Interim care is typically used in an emergency case where a child's physical safety necessitates an instant reaction. In such instances, the departmental delegation for social affairs, acting on a report from the head of a refuge for children in distress or any other person responsible, temporarily places the kid in such a facility. Once the child’s parents are discovered, the centre will care for the child.

In Cameroon, adoption is the only permanent type of alternative care. Essentially, it aims to address the problem of a person or family who is unable to produce children, as well as the problem of a child who has no parents. Adoption is now governed by a patchwork of rules based on both national and international legal instruments, with no special legislation dealing with adoption in place. There are two types of adoption: simple adoption (by mutual consent) and full adoption. Cameroon has made adoption one of the primary issues to be included in the preliminary draft code on the protection of children, which aims to govern both domestic and international adoption, in order to harmonise and modernise the legal framework.[[5]](#footnote-5)

We shall, for a better apprehension of the legal framework regulating adoption in Cameroon, the procedure for adoption in Cameroon, the types of adoption practiced, the requirements, the requisite formalities to be respected and the competent jurisdictions to be sought for adoption.

**THE LEGAL FRAMEWORK ON ADOPTION IN CAMEROON**

Adoption in Cameroon is only permitted in the best interests of the child under the French civil law system. The French Civil Code, promulgated by the order of 5th November 1830,[[6]](#footnote-6) in its Article 343, provides that ‘no adoption shall take place unless for just motives and is of advantage to the adopted child’. The English Children’s Act of 1975 governs adoption in Anglophone Cameroon. Section 3 of the Act states that:

‘In reaching any decision relating to the adoption of a child, the court or adoption
agency shall have regard to all the circumstances, first consideration being given to the need to safeguard and promote the welfare of the child through his childhood; and shall ascertain the wishes and feelings of the child regarding the decision to give consideration to them, having regard on his age and understanding.’[[7]](#footnote-7)

In adoption proceedings, the preceding principle addresses the child's best interests.

The draft Cameroonian Child Protection Code also includes a new concept known as “customary placement,” which is similar to *confiage* in Burkina Faso.[[8]](#footnote-8) According to the Code, customary placement refers to child custody intended to ensure better living conditions for the child that are more conducive to the child’s growth.[[9]](#footnote-9) According to the Code, customary placement is a legal act in which a mother and father or parent to whom the child is affiliated request to confine the child to a member of the extended family or a friendly family, who agrees to receive and raise the child without discrimination.[[10]](#footnote-10)

While customary placement is similar to *confiage* in Burkina Faso, the former is a legal process that considers children’s right to appropriate alternative care mechanisms. In addition to the Child Protection Code, Cameroonian legislature has also drafted the family and Persons Code. Once adopted, this Code will also address children’s rights, particularly in the areas of adoption, affiliation, and succession. Adoption will be given special attention in this Code due to previous legal loopholes that resulted in a significant increase in child adoption by foreigners. As a result, the Family and Persons Code is expected to strengthen adoption procedures in Cameroon in order to prevent child trafficking.[[11]](#footnote-11)

Unfortunately, Cameroon lacks a comprehensive adoption law and instead relies on other pieces of legislation dealing with child adoption issues, such as the Convention on the Rights of the Child (CRC) and the African Charter on the Rights and Welfare of the Child (ACRWC), both of which Cameroon has ratified. Unfortunately, another piece of international legislation, that is, the 1993 Hague Convention on the Protection of children and cooperation in respect of intercountry Adoption that deals exclusively with adoption has not been ratified by Cameroon.

Article 21 of the CRC and Article 24 of the ACRWC, addresses a number of substantive issues concerning intercountry adoption. These provisions address adoptability, the subsidiarity principle, and illegal activities in intercountry adoption, such as trafficking and improper financial gains. Other issues addressed by Article 21 of the CRC and Article 24 of the ACRWC include the establishment of equivalent standards for domestic and international adoption, post-adoption follow-up, and the conclusion of bilateral or multilateral agreements to regulate international adoption.[[12]](#footnote-12)

Other pieces of legislation of an important standing with respect to adoption in Anglophone Cameroon include:

* the Ordinance No. 81-02 of 29 June 1981 relative to the organization of the civil status and other provisions related to conditions of physical persons,
* Law No. 84/04 of 04 July 1984 fixing the conditions of adoption and guardianship of state orphans,
* Circular Letter No. 22/MISAP/DAS/BDI of 27 June 1974 relative to the techniques of enquiry in issues of child adoption,
* Circular Letter No. 81/0018/LC/MINAS/DDS/SPF of 18 September 1981 relative to the granting of authorization for the temporary custody of the children
* Circular Letter No. 90/02759/LC/MINASCOF/DPIF/SDPF of 05 December 1990 reiterating the procedures in questions of temporary custody of abandoned children, and
* Law No. 2005/015 of 29 Dec. 2005 relating to the fight against child trafficking and slavery.

**TYPES OF ADOPTION PRACTICED IN CAMEROON**

Whatever type of adoption occurs in Cameroon, it can only become effective and valid with a court judgment. However, the Ministry of Social Affairs is concerned about social inquiries and cases of foreigners wishing to adopt, as well as the adoption of children under the age of five. The said Ministry is also expected to follow up on adoption cases in order to prevent abuse.

**Simple Adoption**

Simple adoption is not recognized in English law, and thus in Anglophone Cameroon. However, in Francophone Cameroon, it is possible and known as *‘adoption simple’ (gré a gré)*, that is, as agreed between the parties involved. Simple adoption is revocable, and the adopted person maintains family ties with the biological family. However, the adopted person has rights of succession to the estate of the adoptive parents. According to Article 358 of the applicable civil code, simple adoptions can involve both minors and adults. This person must give his or her consent in front of a notary public. In the case of a minor, both parents (or, in the event of a divorce or separation, the person with custody) must agree. Simple adoption has no effect on the adopted person's nationality, though a name change may be granted at the adopter’s request.[[13]](#footnote-13)

**Full or Plenary Adoption**

When we talk about full adoption, we mean adoption that results in the severance of family ties between the adoptee and his or her biological family. With a plenary adoption, all previous blood relationships are severed, and the adoptee is now a member of his adopted family, with no succession rights within his natural family. All of his rights now stem from his adopted family, and the adoptee now has the same rights as if he/she were a born child of the family, including all succession rights vis-à-vis his adopter. However, in England and Wales the courts allows the adoptive parents and the family of the adoptee to keep in contact with each other[[14]](#footnote-14) just to maintain some sort of family ties as one should not be totally separated from his blood

**THE REQUIREMENTS AND CRITERIA TO ADOPT A CHILD**

The determination of eligibility to adopt is a matter of national law, which has several consequences, including the difficulty caused by the adoption of a wide range of criteria relating to age, residency, marriage status, sexual orientation, and income, among others. This is done in order to promote the best interests of the adopted child.

1. **Capacity to Adopt**

This are the requirements that an adoptive parent must fulfil when intending to adopt.

**Minimum Residency**

When the adoptive parents are Cameroonians who live in Cameroon, they must live within the jurisdiction of the court where the adoption application is filed. Residency is encouraged but not required in cases of adoption by foreigners. However, before being matched with a child, prospective adoptive parents are not required to live in Cameroon. The Cameroon Ministry of Social Affairs may require prospective adoptive parents to visit Cameroon for at least three months to get to know the child to be adopted.

**Age of Adopting Parents**

Cameroonian law requires that a single prospective adoptive parent or one person in a married couple be over the age of 40 to adopt. If neither person is over the age of 40 and the couple has been married for ten years, at least one person must be over the age of 35. If neither of these conditions is met, the couple may submit a medical certificate from a physician confirming their infertility to have the age requirement waived.

The prospective adoptive parent must be at least 15 years older than the child for single-parent adoptions. The age difference can be as much as ten years if the adoptee is the kid of the prospective adoptive parent's spouse. The President of the Republic may grant an exemption from the age difference criterion.[[15]](#footnote-15)

**Minimum Income**

The prospective adoptive parent(s) must demonstrate their financial ability to support the adopted child. Bank statements, asset evidence, pay slips, and other financial papers are examples of such evidence.[[16]](#footnote-16)

**Consent of the Adoptive Parents**

Where adoption is sought by married persons, both spouses must agree to the adoption. One spouse may not adopt without the other spouse’s consent. The court, being aware of such may rescind the adoption especially if the other spouse is in disagreement.

**Best Interest of the Child in Adoption**

Whatever form of adoption is used in Cameroon, it must be profitable and in the best interests of the person being adopted. This is in accordance with Article 21 of the Convention on the Rights of the Child of 1989. (CRC).

1. **Requirements of the Adoptee**

These are criteria that touches on the child to be adopted.

**Consent of the child and/or parents or guardian**

The child’s legal parents, guardians, or other entity with legal custody of the child must consent in writing to the child’s irrevocable and unconditional release for adoption, and they must comprehend the nature and consequences of the adoption. In the case of a plenary adoption, such permission removes all parental rights and obligations between the individual(s) or entity and the child. If the youngster is 16 or older, he or she must also offer written approval. For a full and final adoption, a child must be regarded abandoned, or his or her parents’ rights must have been relinquished, or the parents must be unknown or deceased.[[17]](#footnote-17)

**Age of the Adoptive Child**

Before a child can be adopted in Cameroon, they must be at least 5 years old for plenary adoption.[[18]](#footnote-18) However, under Cameroonian law, children below the age of 5 years can be adopted under special circumstances. There however is no maximum age for adoption but one may only presume based on the age of majority. This too presents a difficulty as different pieces of legislation provide for different age of majority.

**Child that can be adopted**

In Cameroon, children whose parents are unknown or deceased, abandoned children, children already related by a relationship or alliance to the adoptive parent or one of them, if the adoption is made by spouses, children whose parents or legal representative has consented to the adoption, and orphans of the nation as defined by Law No. 84/04 of 04 July 1984[[19]](#footnote-19) can be adopted.

**THE FORMALITY FOR ADOPTION**

The Ministry of Social Affairs and the High Court[[20]](#footnote-20) of the place of residency of the child to be adopted have jurisdiction. The process for adopting a child in Cameroon often includes multiple steps. The steps are divided into three stages: investigation, evaluation, and experimentation, judicial, and post-adoption supervision and monitoring.

**The Investigation, Evaluation and Experiment Phase**

This phase comprises the time when an adoptive parent decides to adopt a child and takes the initial step by applying. This will include identifying a youngster for adoption. A social welfare officer is assigned to do background checks on the adoptive parents and the family with whom the adopted child will live. If the investigations and appraisal of the adoptive parent are favorable or not, the social welfare officer will file a report, whether good or poor.[[21]](#footnote-21)

**The Judicial Phase**

In order to make a decision on the adoption, a complete court hearing is required. The adoptive parents are scrutinized in court by a judge throughout this procedure, and the State Counsel is the pivot in such hearings as he represents the state in order to determine whether the adoption is in the best interests of the kid. If the child to be adopted is present in court, and is not a teenager, he may be questioned to discover his permission. The judge may rule in favor or against the petitioner. In the event of denial, the applicant has three months to file an appeal.

Before issuing an adoption decree, the Cameroonian High Court must assess that the following four criteria have been met:

* That each person whose consent is required has agreed to and understands the nature and consequences of the adoption. Such permission is irrevocable and serves all legal relationships between the biological parents and the child in perpetuity.
* That adoption will improve the child's well-being. Parents must demonstrate how they can provide for their child in ways that others cannot.
* The adoption was motivated by the fact that there was no payment or reward.
* That the potential adoptive parent is in good health.

**The Post-adoption control and Monitoring Phase**

This entails monitoring after an adoption is completed in order to guarantee that the adopted child is living in good health. This is a condition that the Cameroonian authorities frequently fail to meet.

**THE AUTHORITIES TO GRANT ADOPTION**

In Cameroon, the High Court has jurisdiction to hear and decide on adoption issues. In Anglophone Cameroon, Section 15 of the SCHCL grants the High Court competence to consider adoption cases. Adoption cases are also brought to court under Section 18 (1) (b) of Law N° 2011/027 on Judicial Organization, which states that “the High Court shall have jurisdiction to hear and determine suits and proceedings relating to status of persons; civil status, marriage, divorce, affiliation, adoption, and inheritance.” The Ministry of Social Affairs is the Ministry that is in charge of investigations and evaluation for placing of children on adoption. This ministry has regional, divisional and sub-divisional offices around the country.

**THE DILEMMA SURROUNDING THE PROCEDURE FOR ADOPTION IN CAMEROON**

Cameroon operates a bi-jural legal system owing to its colonial past. That is, the Common Law Legal System (derived from Great Britain) and the Civil Law Legal System (derived from France). The Common Law system operates in Former Southern Cameroon on the one part, while the Civil Law system operates in the regions of Former Western Cameroon (French speaking regions) on the other part.[[22]](#footnote-22)

In Anglophone Cameroon, the courts have always had the problem of interpretation of Sections 10 of the Southern Cameroons High Court Law, as to the use of post 1900 English Statute with regards to the issue of adoption as evident in the ***Bernard Fonlon’s*** Case. This is due to the fact that Cameroon lacks a stringent local legislation on the subject. This gives room for complex issues with regards to adoption in Cameroon and anglophone Cameroon in particular.

The procedure for adoption in Cameroon is outlined in sections 343 to 370 of the Civil Code, as well as section 41 of Ordinance No. 82/02 of 29 June 1981[[23]](#footnote-23), as revised on May 6, 2011,[[24]](#footnote-24) to relating to Civil Status Registration and Status of Persons in Cameroon.

Adoption applications or petitions are non-adversarial proceedings.[[25]](#footnote-25) There are no plaintiff(s) or petitioner(s) on the one hand, and no defendant/respondent to the complaint on the other. Yet, it is a sensitive subject to build an artificial legal relationship out of a previously non-existent relationship. It is a matter of public order to which the state must pay attention, and as such, the Legal Department must always submit before the court can issue its decision approving or refusing adoption.[[26]](#footnote-26)

It is worth noting that as a party to the proceedings, the Legal Department may appeal a court decision granting adoption, as seen in the case of ***Ntamack Therese contre Qui de Droit***,***[[27]](#footnote-27)***where the Supreme Court of Cameroon, in deciding an appeal filed before it by the Legal Department, quashed the decision of the original court that had granted adoption to the applicant, Miss Ntamack, despite the fact that she was only 29 years old at the time she filed for adoption. As a result, it ruled that the originating court had erred in law, by not respecting the provisions of the which states that adoption rights are only granted to people above the age of 40 who file individual petitions.[[28]](#footnote-28)

Adoption is under the purview of issues of public order, resulting in the state’s and courts’ protectionist stance. The Legal Department must file submissions in support of or against the application’s approval. Adoption attempts to establish a legal tie where there was previously no biological or natural link.

The court’s primary responsibility is to determine the adoptee's best interests. As such, before granting adoption, the court may conduct any relevant inquiry to ascertain this paramount interest. The aforementioned interests are both moral (or ethical) and material-financial in nature. Moral, in the sense that the applicant should not be a gangster or a criminal incapable of giving the adoptee with the moral standards expected of an ordinary person in society. Above all, the applicant must be mentally sound. On the other hand, in terms of material-financial interest, adoption cannot be allowed in order to transfer a kid from a better (financially) to an impoverished household..[[29]](#footnote-29)

A significant issue with adoption proceedings is the fact that the court or judge in proclaiming its decision does not have to justify it, that is, there is no requirement that the court expressly disclose in its decision the circumstances, doctrines, and principles that guided him in reaching the same.

The court begins by determining if all legal requirements for adoption have been met. As a result, the court may conduct additional inquiries, even through intermediaries such as social services or other individuals, as the situation may be. As a result, the court has broad discretion.[[30]](#footnote-30)

**The Lack of an Applicable Law on Adoption in Anglophone Cameroon**

Given that in questions of adoption, reliance must be made to applicable English law, it is important noting that the concept of legal adoption was unknown under common law. According to Section 11 of the Southern Cameroons High Court Law 1955, the Adoption Act of 1926 and subsequent acts are not applicable in Anglophone Cameroon. Adoption was made legal in England and Wales by the Adoption of Children Act 1926. Further Acts were passed, including the Adoption of Children (Regulations) Act of 1939, as well as the Adoptions Acts of 1950, 1960, 1964, and 1968. The Children Acts of 1975 and 1976 later consolidated portions of the 1958 Act. The law is ever-changing, and adoption in England is now controlled by the Adoption and Children Act 2002.[[31]](#footnote-31)

As a result, the position in Anglophone Cameroon regarding substantive adoption legislation remains unclear. Adoption is not governed by substantive law. Because of this gap in the legislation, judges tend to rule on adoption issues using English law. As a result, full adoption is recognized under substantive English law. The precise English statute governing adoption is, however, left to the presiding judge in any individual adoption proceeding before the courts, producing an imprecise position. The courts took the lead and adopted the precedent set by the Court of Appeal in ***Bernard Fonlon v. Judith Fonlon & Others***.*[[32]](#footnote-32)* In that case, the Court of Appeal rejected the High Court’s decision to decline jurisdiction in adoption cases due to a lack of substantive law. The Court of Appeal dismissed the appeal for failure to comply with the consent requirements of Section 3(1) of the 1958 English Adoption Act. The Court based its ruling on Section 10 of the Southern Cameroons High Court Law 1955, which, as critics have pointed out, refers to procedural rather than substantive law.[[33]](#footnote-33)

Court decisions approving adoption have generally followed this precedent, applying the 1958 English Adoption Act and subsequent adoption acts. Judges in Cameroon in general use Section 18(1) of the 2011 Law on Judicial Organization to consider adoption cases. The judges in Anglophone Cameroon further make reference to Section 10 of the Southern Cameroons High Court Law 1955 as allowing them to apply English law, namely post-1900 statutes. However, the lack of a comprehensive law on adoption in Cameroon and Anglophone Cameroon continue to presents problems as judges in Anglophone Cameroon make use of different English statutes. In the case of ***Ngam Theresia Lum V. The State of Cameroon, Esther Bei Muchoh & Neh* *Muchoh Adeline****,[[34]](#footnote-34)* the judge in making the adoption order, relied on the provisions of the 1958 English Adoption Act as read with section 21 of the CRC and Section 24 of the ACRWC. On the other hand, in the case of ***Dr. Diggelmann Martin V The People of Cameroon & Tabi* *Rachel Anderson***,[[35]](#footnote-35) the presiding judge rather relied on the provisions of the English Adoption Act 2002 as well as the provisions of the United Nations CRC and the ACRWC.

As a result, it is unclear which English statute should apply in adoption proceedings heard in the English common law courts of the two English-speaking regions. Section 50 of the Adoption and Children Act of 2002 states that an adoptive parent must be at least 21 years old (a parent adopting his or her own child with their partner need only be 18 years of age). The 2002 Act controls unique features of adoption in England, such as its consequences on succession rights and the agencies involved. Only children under the age of 18 can be adopted under the 1975 Children Act, and the applicant or joint applicants must be at least 21 years old. This exemplifies the state of confusion in Anglophone Cameroon’s adoption laws.

**Conflict of Laws on the Age of Majority**

There is the problem of conflict of laws with regards to the age of majority in Cameroon. different pieces of legislation provide different ages of majority thereby presenting a challenge to adoption in Cameroon. The civil status ordinance for example provides 15 years for a lady and 18 years for the male as minimum marriage age, criminal culpability is 18 years, electoral age is 20. With all these differences in the age of majority in different legal instruments, the process of adoption becomes wanting in regards of the maximum age of a person to be adopted. This will now leave us to define who a child or minor is as per Cameroonian law.

**Conclusion**

The Convention on the Rights of the Child expressly recognizes adoption as one of four types of alternative care choices. Article 21 includes a set of standards intended to ensure that adoption is governed by the best interests of the child. They include requiring that all adoptions be approved by competent authorities and that all parties involved, including birth parents, provide informed consent (unless consent is impossible or not required for some other reason). Unfortunately, our courts of law continue to err in following these procedures.

Moreso, the lack of a comprehensive piece of legislation regulating issues of adoption in Cameroon and Anglophone Cameroon in particular has been a difficulty for the common law courts to address. Different judges make use of different English statutes, meanwhile others deny jurisdiction altogether. This hinders a smooth observance of the procedure for adoption.

In order to regulate intercountry adoption, one option available to countries is to enter into cooperation agreements. Both the CRC and the ACRWC suggest this option for States, but very few African countries with Cameroon not being among, have entered into bilateral and multilateral agreements of this nature.

One of the important roles of the 1993 Hague Convention on intercountry adoption is promoting children’s best interests, and particularly in addressing illegal intercountry adoption practices. It is unfortunate that Cameroon is not party to the Hague Convention relating to inter-country adoption despite the fact that most children adopted in Cameroon are done by foreigners. It will be in the best interest of Cameroonian children placed on adoption and the State in general for Cameroon to be a party to this convention as well as other bilateral and multilateral conventions and treaties.

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18. Fombo L. Nuyebga. (2021). ‘Legal and Regulatory Framework for the Adoption Procedure in Cameroon’. <https://www.linkedin.com/pulse/legal-regulatory-framework-adoption-procedure-fombo-lega-nuyebga-> (accessed on the 18th of March 2023). [↑](#footnote-ref-18)
19. Law No. 84/04 of 04 July 1984 fixing the conditions of adoption and guardianship of state orphans [↑](#footnote-ref-19)
20. Section 15 of the Southern Cameroon High Court Law and Section 18 of Law N° 2011/027 on Judicial Organization in Cameroon [↑](#footnote-ref-20)
21. Fombo L. Nuyebga, *supra.* [↑](#footnote-ref-21)
22. Fombo L. Nuyebga *supra* [↑](#footnote-ref-22)
23. Ordinance No. 82/02 of 29 June 1981 to Organise Civil Status Registration in Cameroon. [↑](#footnote-ref-23)
24. Law No.2011/011 of 6th May 2011 modifying and completing specific provisions of ordinance No.81-02 of June 29th, 1981 applying to the organization of civil status and various provisions relating to the status of persons. [↑](#footnote-ref-24)
25. Adoption proceedings are commenced by petition before the High Courts of Cameroon. [↑](#footnote-ref-25)
26. Wirngo Alexanda Suiy, The Legal Framework of Adoption in Cameroon (Part One: In the French Speaking Regions of Cameroon) at <https://www.linkedin.com> (accessed on the 31st of March 2022)*.* [↑](#footnote-ref-26)
27. Arret no. 67/CC du 18 Mai 2000. [↑](#footnote-ref-27)
28. See Article 344 of the Code Civil [↑](#footnote-ref-28)
29. *Ibid* [↑](#footnote-ref-29)
30. *Ibid*  [↑](#footnote-ref-30)
31. Irene Ngum Asanga, (2020), *supra*  [↑](#footnote-ref-31)
32. Appeal N° BCA/2/75 (Unreported) [↑](#footnote-ref-32)
33. Ephraim N. Ngwafor, Family Law in Anglophone Cameroon, The University of Regina Press, 1993, p. 243 [↑](#footnote-ref-33)
34. Suit N° HCF/095/OM/2018(Unreported) [↑](#footnote-ref-34)
35. Suit N° HCF/001/OM/2018 (Unreported) [↑](#footnote-ref-35)