

<b>Country/entity</b>	South Sudan
<b>Region</b>	Africa (excl MENA)
<b>Agreement name</b>	Lou Nuer-Dinka Bor-Murle Action for Peace, Jonglei State
<b>Date</b>	25 Mar 2021
<b>Agreement status</b>	Multiparty signed/agreed
<b>Interim arrangement</b>	Yes

**Agreement/conflict level** Intrastate/local conflict

### **Sudan Conflicts (1955 - )**

Agreements relate to several distinct dyads, and also the negotiated independence of South Sudan, and subsequent internal conflict in South Sudan. Sudan-South Sudan. The long-standing conflict between the north and the south of the country dates back to colonial times, where the British introduced a so-called 'Southern Policy', severely hampering population movements between these big regions. Immediately after gaining independence in 1956, southern movements started to fight for independence; this fight became professionalised in 1983 with the foundation of the soon internationally supported Sudan People's Liberation Army (SPLA). When the Islamic Front government introduced strict sharia laws in the south after it took over power in 1988 the war intensified. A decade later, the military situation reached a stalemate, enabling internationally facilitated peace negotiations to begin in 1997. After more fighting, a final negotiation push began in 2002, leading to the signing of the Comprehensive Peace Agreement (CPA) in January 2005.

Sudan-South Sudan post referendum. South Sudan became independent in July 2011; since then, relations between the two countries are complicated and violent conflict led by the SPLM (North) in the Sudanese Nuba mountains region has since intensified.

Darfur. Other long-standing violent conflicts are in the east and the west of the country. In the east, the Beja Congress, established in 1957, is the spearhead of a currently 'peaceful' opposition movement. In the west, the violent conflict in Darfur intensified in the early 2000s and rapidly gained international attention, even resulting in genocide charges against leading figures of the Sudanese government. The situation on the ground is complex, with over a dozen organisations (most notably the Sudanese Liberation Movement and the Justice and Equality Movement) fighting the Sudanese government and allied groups like the Janjaweed – although all parties have switched sides on numerous occasions. Several mediation attempts have not been successful, due to the shaky commitment of the Sudanese central government and the distrust among the armed opposition.

#### **South Sudan - internal**

In December 2013, after president Salva Kiir accused opposition leader Riek Machar of attempting a coup, violent conflict broke out between government forces of the SPLM/A and anti-governmental groups. In addition, several other political militias as well as communal militias have joined the conflict. In 2015 the Agreement on the Resolution of the Conflict in South Sudan (ARCSS) was signed. Due to unsuccessful implementation the agreement was revitalized in 2018. In September 2019, Kiir and Machar agreed to establish a power-sharing government after struggles on forming a unity transitional government.

Close

Sudan Conflicts (1955 - )

**Stage** Framework/substantive - partial

**Conflict nature** Inter-group

<b>Peace process</b>	South Sudan: Post-secession Local agreements
<b>Parties</b>	<p>Liyliy Yieh Chan - Lou Nuer Youth Leaders' Representative</p> <p>Kangach Chiok Deng - Lou Nuer Paramount Chiefs' Representative</p> <p>Mary Nyapet Puok - Lou Nuer Women's Representative</p> <p>Alek Many - Dinka Bor Youth Leaders' Representative</p> <p>Malak Ayuen Mayen + Dinka Bor Paramount Chiefs' Representative</p> <p>Alek Manyuon Deng – Dinka Bor Women’s Representative</p> <p>Turyal Peluk Oleyo – Murle Youth Leaders’ Representative</p> <p>Nyathiko Gola Labarech – Murle Paramount Chiefs’ Representative</p> <p>Mary Beri Oleyeo – Murle Women’s Representative</p>
<b>Third parties</b>	<p>Page 5:</p> <p>Guaranteed by</p> <p>Gok Deng Dak Kueth Deng</p> <p>Spiritual leader</p> <p>...</p> <p>The facilitation of the Conference was supported by UK Aid, USAID and UNMISS</p>
<b>Description</b>	<p>This local agreement aims to resolve the violent conflict between the Lou Nuer, Dinka Bor, and Murle groups in Jonglei, South Sudan. The violence among these groups resulted in deaths, abductions of women and children, cattle theft. This agreement is the result of wide inter-communal talks, which included the chiefs, women's groups and youth groups, and which were supported by Gok Deng Dak Kueth Deng (Spiritual leader) and facilitated by UK Aid, USAID and UNMISS. In the agreement, the communities pledge to support peace efforts, and develop modalities for punishment of perpetrators, return of abducted women and children, and return of stolen cattle.</p>
<b>Agreement document</b>	<p><a href="#">SS_210324 Dinka Bor Murle Agreement.pdf (opens in new tab)</a>   <a href="#">Download PDF</a></p>

## Groups

### Children/youth

Groups→Children/youth→Substantive

Page 2:

Resolutions

1 . Regarding abducted children and women

1 .1 . Youth leaders are the ones to lead the collection of abducted children.

1 .2. Women have committed to participate in the child identification and recovery effort.

1 .3. Collection will be done in close collaboration with chiefs and local authorities in the areas. If someone refuses to surrender a child, the government can intervene.

1 .4. The Conference agrees that the reunification process will be ongoing, beginning with the exchange of all the women and children currently held in Pibor and Pieri.

1 .5. The Conference requests construction of transitional centres for children in Pieri, Pibor and Bor Town that include provision for incoming and outgoing abductees. This may be extended to Akobo East and possible other centres.

1 .6. NGOs are requested to support with the construction and services of the transitional centres and with transporting of the women and children.

1 .7. Youth leaders and chiefs, as necessary, are to travel between communities during the collection of abducted children so as to help the tracing process.

1 .8. Reunification of children is to be undertaken as soon as practicable in order that communities build trust and confidence in the peace process, also to encourage perpetrators and communities to surrender the remaining children.

1 .9. Final verification can be completed through the transitional centres.

1 .10. In more complicated cases, for example women who were abducted and have become mothers, will first be returned and if there is a marriage request the case can be picked up from their community of origin.

1 .11 . Women demanded that they be included in all steps of these processes.

Page 3-4:

5. Regarding the dissemination of the Peace

5.8. Youth leaders requested three Thuraya phones, or a general improvement to mobile network coverage, to facilitate their work of collecting the abducted children, curb cattle raiding and related criminal activities.

Page 4:

6. Regarding measures to strengthen development

6.1. The Conference reaffirmed the development priorities outlined in Section 6 of the Rumbek Commitment to Peace, with further emphasis on the following:

...

6.1.3. The Conference, and women in particular, repeated the proposal for a tri-communal boarding school to be established in the border areas, for confidence and trust building. The Conference also proposed the introduction of Pastoralist Education schemes.

...

6.1.6. The Conference requested the provision of agricultural tools and vocational training for youth, to transition to a sustainable livelihood beyond conflict.

### Disabled persons

No specific mention.

<b>Elderly/age</b>	No specific mention.
<b>Migrant workers</b>	No specific mention.
<b>Racial/ethnic/ national group</b>	No specific mention.
<b>Religious groups</b>	No specific mention.
<b>Indigenous people</b>	No specific mention.
<b>Other groups</b>	No specific mention.
<b>Refugees/displaced persons</b>	No specific mention.
<b>Social class</b>	No specific mention.

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**Gender**

## **Women, girls and gender**

Page 1:

Preamble

We, representatives of youth leaders, traditional leaders, and women from the Dinka Bor, Murle and Lou Nuer communities;

Aware that the current conflict has caused deep and prolonged suffering in all our communities, particularly affecting women and children;

Page 2:

Resolutions

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1.1. Youth leaders are the ones to lead the collection of abducted children.

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1.10. In more complicated cases, for example women who were abducted and have become mothers, will first be returned and if there is a marriage request the case can be picked up from their community of origin.

1.11. Women demanded that they be included in all steps of these processes.

Page 3-4:

5. Regarding the dissemination of the Peace

5.4. The women have underlined the importance of peace and reconciliation, love and forgiveness, and praying to God together for mercy and grace. Women will return and commit to warning their sons to stop raiding other communities. If a problem persists, they have warned they will milk out the milk from their breasts to the floor as a curse to the young men who have violated the peace.

5.5. Women from the three communities must stand up to ensure that this peace is holding, particularly through advocacy and moving between locations, talking to people. Women must unite, regardless of their tribe. They should be provided with communication tools, as well as the men. Women have requested radio talk shows to publicise the message of peace among the three tribes; to be known nationwide, regionally, and globally.

5.6. Women propose the formation of a Women's Peace Committee, and three (one from each community) appointed as an initial Steering Committee. They request being given a uniform of the same colour and this committee is the one to move from Dinka Bor to Murle to Lou Nuer as a Committee that preaches peace. If the women are together in a location, youth may also fear to attack.

5.7. Women will encourage inter-marriages between the three tribes; they are the guardians of the daughters.

Page 4:

6. Regarding measures to strengthen development

<b>Men and boys</b>	No specific mention.
<b>LGBTI</b>	No specific mention.
<b>Family</b>	No specific mention.

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## **State definition**

<b>Nature of state (general)</b>	No specific mention.
<b>State configuration</b>	No specific mention.
<b>Self determination</b>	No specific mention.
<b>Referendum</b>	No specific mention.
<b>State symbols</b>	No specific mention.
<b>Independence/secession</b>	No specific mention.
<b>Accession/unification</b>	No specific mention.
<b>Border delimitation</b>	No specific mention.
<b>Cross-border provision</b>	No specific mention.

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## **Governance**

<b>Political institutions (new or reformed)</b>	No specific mention.
<b>Elections</b>	No specific mention.
<b>Electoral commission</b>	No specific mention.
<b>Political parties reform</b>	No specific mention.



<b>Civil society</b>	No specific mention.
<b>Traditional/ religious leaders</b>	<p>Page 3:</p> <p>4. Regarding traditional justice and governance mechanisms</p> <p>4.1. Perpetrators since the beginning of this process, 10 December 2021 , must be arrested and face the justice process.</p> <p>4.2. If a perpetrator remains in hiding, the Chief of their community will be arrested as the community representative responsible for his community.</p> <p>4.3. The traditional chiefs call for the establishment of a Traditional Leaders' Circuit Court that moves through the three communities to address inter-communal issues. The Court would be responsible for addressing issues of inter-communal raiding, abductions and violence, and disputes over abducted children, and women.</p> <p>4.4. The Conference requests the support of the international community with the transport and logistics of the Traditional Leaders' Circuit Court.</p> <p>4.5. Traditional leaders requested capacity building on good governance, with particular reference to conflict resolution.</p> <p>4.6. The Chiefs have said the compensation must be paid for the deaths in the period since December. The agreed compensation for the recent killings should be 50 cows.</p>
<b>Public administration</b>	No specific mention.
<b>Constitution</b>	No specific mention.

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## **Power sharing**

<b>Political power sharing</b>	No specific mention.
<b>Territorial power sharing</b>	No specific mention.
<b>Economic power sharing</b>	No specific mention.
<b>Military power sharing</b>	No specific mention.

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## **Human rights and equality**

<b>Human rights/RoL general</b>	No specific mention.
<b>Bill of rights/similar</b>	No specific mention.
<b>Treaty incorporation</b>	No specific mention.

<b>Civil and political rights</b>	No specific mention.
<b>Socio-economic rights</b>	Human rights and equality→Socio-economic rights→Education Page 4: 6. Regarding measures to strengthen development 6.1. The Conference reaffirmed the development priorities outlined in Section 6 of the Rumbek Commitment to Peace, with further emphasis on the following: ... 6.1.3. The Conference, and women in particular, repeated the proposal for a tri-communal boarding school to be established in the border areas, for confidence and trust building. The Conference also proposed the introduction of Pastoralist Education schemes. ... 6.1.6. The Conference requested the provision of agricultural tools and vocational training for youth, to transition to a sustainable livelihood beyond conflict.

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## **Rights related issues**

<b>Citizenship</b>	No specific mention.
<b>Democracy</b>	No specific mention.
<b>Detention procedures</b>	No specific mention.
<b>Media and communication</b>	No specific mention.
<b>Mobility/access</b>	Page 4: 6. Regarding measures to strengthen development 6.1. The Conference reaffirmed the development priorities outlined in Section 6 of the Rumbek Commitment to Peace, with further emphasis on the following: 6.1.1. Roads as a critical enabler of livelihoods, especially between Pibor and Pieri, between Twic East and Pibor, and between Lekuangole and Akobo, as a supplement to the existing international agency plans. ... 6.1.7. Common Markets will be an essential factor of trade and improved livelihoods across the Greater regions.
<b>Protection measures</b>	No specific mention.
<b>Other</b>	No specific mention.

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**Rights institutions**

**NHRI**                      No specific mention.

**Regional or  
international  
human rights  
institutions**              No specific mention.

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## **Justice sector reform**

**Criminal justice and emergency law** No specific mention.

**State of emergency provisions** No specific mention.

**Judiciary and courts** Page 3:

4. Regarding traditional justice and governance mechanisms
- 4.1. Perpetrators since the beginning of this process, 10 December 2021 , must be arrested and face the justice process.
- 4.2. If a perpetrator remains in hiding, the Chief of their community will be arrested as the community representative responsible for his community.
- 4.3. The traditional chiefs call for the establishment of a Traditional Leaders' Circuit Court that moves through the three communities to address inter-communal issues. The Court would be responsible for addressing issues of inter-communal raiding, abductions and violence, and disputes over abducted children, and women.
- 4.4. The Conference requests the support of the international community with the transport and logistics of the Traditional Leaders' Circuit Court.
- 4.5. Traditional leaders requested capacity building on good governance, with particular reference to conflict resolution.
- 4.6. The Chiefs have said the compensation must be paid for the deaths in the period since December. The agreed compensation for the recent killings should be 50 cows.

**Prisons and detention** No specific mention.

**Traditional Laws** Page 3:

4. Regarding traditional justice and governance mechanisms
- 4.1. Perpetrators since the beginning of this process, 10 December 2021 , must be arrested and face the justice process.
- 4.2. If a perpetrator remains in hiding, the Chief of their community will be arrested as the community representative responsible for his community.
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## Socio-economic reconstruction

<b>Development or socio-economic reconstruction</b>	<p>Socio-economic reconstruction→Development or socio-economic reconstruction→Socio-economic development</p> <p>Page 4:</p> <p>6. Regarding measures to strengthen development</p> <p>6.1. The Conference reaffirmed the development priorities outlined in Section 6 of the Rumbek Commitment to Peace, with further emphasis on the following:</p> <p>6.1.1. Roads as a critical enabler of livelihoods, especially between Pibor and Pieri, between Twic East and Pibor, and between Lekuangole and Akobo, as a supplement to the existing international agency plans.</p> <p>6.1.2. Women request equitable provision of tailoring machines, soap making and other activities for women.</p> <p>6.1.3. The Conference, and women in particular, repeated the proposal for a tri-communal boarding school to be established in the border areas, for confidence and trust building. The Conference also proposed the introduction of Pastoralist Education schemes.</p> <p>6.1.4. Women request for micro-finance schemes for youth in order for them to improve livelihoods.</p> <p>6.1.5. Youth have requested seed funding to establish a revolving fund, to be administered jointly by the Youth Peace Implementation Committee.</p> <p>6.1.6. The Conference requested the provision of agricultural tools and vocational training for youth, to transition to a sustainable livelihood beyond conflict.</p> <p>6.1.7. Common Markets will be an essential factor of trade and improved livelihoods across the Greater regions.</p> <p>6.1.8. Women have proposed the establishment of business centres and cooperatives for women of the three communities in different locations across the Greater Jonglei.</p> <p>Socio-economic reconstruction→Development or socio-economic reconstruction→Infrastructure and reconstruction</p> <p>Page 3-4:</p> <p>5. Regarding the dissemination of the Peace</p> <p>5.8. Youth leaders requested three Thuraya phones, or a general improvement to mobile network coverage, to facilitate their work of collecting the abducted children, curb cattle raiding and related criminal activities.</p> <p>Page 4:</p> <p>6. Regarding measures to strengthen development</p> <p>6.1. The Conference reaffirmed the development priorities outlined in Section 6 of the Rumbek Commitment to Peace, with further emphasis on the following:</p> <p>6.1.1. Roads as a critical enabler of livelihoods, especially between Pibor and Pieri, between Twic East and Pibor, and between Lekuangole and Akobo, as a supplement to the existing international agency plans.</p>
<b>National economic plan</b>	No specific mention.
<b>Natural resources</b>	No specific mention.
<b>International funds</b>	No specific mention.

**Business**

Page 4:

6. Regarding measures to strengthen development

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6.1.2. Women request equitable provision of tailoring machines, soap making and other activities for women.

6.1.3. The Conference, and women in particular, repeated the proposal for a tri-communal boarding school to be established in the border areas, for confidence and trust building. The Conference also proposed the introduction of Pastoralist Education schemes.

6.1.4. Women request for micro-finance schemes for youth in order for them to improve livelihoods.

6.1.5. Youth have requested seed funding to establish a revolving fund, to be administered jointly by the Youth Peace Implementation Committee.

6.1.6. The Conference requested the provision of agricultural tools and vocational training for youth, to transition to a sustainable livelihood beyond conflict.

6.1.7. Common Markets will be an essential factor of trade and improved livelihoods across the Greater regions.

6.1.8. Women have proposed the establishment of business centres and cooperatives for women of the three communities in different locations across the Greater Jonglei.

**Taxation**

No specific mention.

**Banks**

Socio-economic reconstruction→Banks→Personal or commercial banking

Page 4:

6. Regarding measures to strengthen development

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6.1.5. Youth have requested seed funding to establish a revolving fund, to be administered jointly by the Youth Peace Implementation Committee.

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## **Land, property and environment**

**Land reform/rights** No specific mention.

### **Pastoralist/ nomadism rights**

Page 2-3:

2. Regarding Cattle-related incidents since December

2.1. All three communities condemned ongoing criminal incidents, and underlined the urgency of finding a more conclusive response to ongoing criminal raids.

2.2. Cattle stolen since the December Pieri Agreement must be returned to their rightful owners. The meeting commends the GPAA Chiefs and Youth Leaders for collecting some of the stolen cattle.

2.3. Cattle losses, including the colour of individual cattle, are to be registered before the transfer of cattle.

2.4. Murle are to separate the cattle that were stolen on the side of Dinka Bor from those stolen on the side of Lou Nuer, and drive them to Gadiang and Pieri, respectively. They will be accompanied by local government officials.

2.5. Returned cattle will be processed by the local authorities in those centres, and that process will be their responsibility.

3. Regarding future cattle related incidents

3.1. Youth strongly affirmed their ownership of the peace process and commitment to stop attacks.

3.2. All communities reject immediate retaliation against incidents. It is not a legitimate response to conflict incidents.

3.3. The Conference noted that Murle youth are still dispersed in bush areas and have not received the peace message. They are suspected to be those violating the agreement since December.

3.4. The Conference accepted that the Murle would be given further time to address issues of ongoing theft in these bush areas.

3.5. The Youth Leaders will form a Peace Implementation Committee that will be the appropriate channel for reporting and peacefully responding to any future cattle related incidents.

3.6. The Youth proposed that the Committee should be facilitated to move for two weeks every two months to cover the dissemination of the peace across the three greater areas and address any emerging issues.

3.7. Youth Leaders proposed that there be established a joint protection force of the three youth communities, to be deployed as needed by the Peace Implementation Committee.

**Cultural heritage** No specific mention.

**Environment** No specific mention.

**Water or riparian rights or access** No specific mention.

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**Security sector**

**Security Guarantees** No specific mention.

**Ceasefire** No specific mention.

**Police** No specific mention.

**Armed forces** No specific mention.

**DDR** No specific mention.

**Intelligence services** No specific mention.

**Parastatal/rebel and opposition group forces** Page 3, Resolutions  
3. Regarding future cattle incidents  
3.7. Youth Leaders proposed that there be established a joint protection force of the three youth communities, to be deployed as needed by the Peace Implementation Committee.

**Withdrawal of foreign forces** No specific mention.

**Corruption** No specific mention.



<b>Crime/organised crime</b>	<p>Page 2, Resolutions</p> <p>1 . Regarding abducted children and women</p> <p>1 .1 . Youth leaders are the ones to lead the collection of abducted children.</p> <p>1 .2. Women have committed to participate in the child identification and recovery effort.</p> <p>1 .3. Collection will be done in close collaboration with chiefs and local authorities in the areas. If someone refuses to surrender a child, the government can intervene.</p> <p>1 .4. The Conference agrees that the reunification process will be ongoing, beginning with the exchange of all the women and children currently held in Pibor and Pieri.</p> <p>1 .5. The Conference requests construction of transitional centres for children in Pieri, Pibor and Bor Town that include provision for incoming and outgoing abductees. This may be extended to Akobo East and possible other centres.</p> <p>1 .6. NGOs are requested to support with the construction and services of the transitional centres and with transporting of the women and children.</p> <p>1 .7. Youth leaders and chiefs, as necessary, are to travel between communities during the collection of abducted children so as to help the tracing process.</p> <p>1 .8. Reunification of children is to be undertaken as soon as practicable in order that communities build trust and confidence in the peace process, also to encourage perpetrators and communities to surrender the remaining children.</p> <p>1 .9. Final verification can be completed through the transitional centres.</p> <p>1 .10. In more complicated cases, for example women who were abducted and have become mothers, will first be returned and if there is a marriage request the case can be picked up from their community of origin.</p> <p>1 .11 . Women demanded that they be included in all steps of these processes.</p>
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**Drugs** No specific mention.

**Terrorism** No specific mention.

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## Transitional justice

**Transitional justice general** No specific mention.

**Amnesty/pardon** No specific mention.

**Courts** No specific mention.

**Mechanism** No specific mention.

**Prisoner release** No specific mention.

**Vetting** No specific mention.

**Victims**

Page 2:

**Resolutions****1 . Regarding abducted children and women**

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- 1 .2. Women have committed to participate in the child identification and recovery effort.
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- 1 .9. Final verification can be completed through the transitional centres.
- 1 .1 0. In more complicated cases, for example women who were abducted and have become mothers, will first be returned and if there is a marriage request the case can be picked up from their community of origin.
- 1 .1 1 . Women demanded that they be included in all steps of these processes.

**Missing persons**

No specific mention.

## **Reparations**

Transitional justice→Reparations→Material reparations

Page 2:

2. Regarding Cattle-related incidents since December

2.2. Cattle stolen since the December Pieri Agreement must be returned to their rightful owners. The meeting commends the GPAA Chiefs and Youth Leaders for collecting some of the stolen cattle.

Page 3:

4. Regarding traditional justice and governance mechanisms

...

4.6. The Chiefs have said the compensation must be paid for the deaths in the period since December. The agreed compensation for the recent killings should be 50 cows.

## Reconciliation

Page 3:

Regarding future cattle incidents

3.6. The Youth proposed that the Committee should be facilitated to move for two weeks every two months to cover the dissemination of the peace across the three greater areas and address any emerging issues.

Page 3-4:

5. Regarding the dissemination of the Peace

5.1. Following the Conference, Chiefs commit to taking an active role in the dissemination of the Pieri Action for Peace, in Pibor and Bor, and with any communities who need to hear the message, as well as with the community leaders of the three Greater regions.

5.2. The Chiefs will also take responsibility for appropriate rituals to be conducted in Pibor and Bor to complement the ceremonies in Pieri led by Dak Kueth.

5.3. The Conference agreed that the communities of Ayod and Jikany need to be reached urgently with the peace dissemination. The communities propose a caravan to take leaders from those communities to the other two sides.

5.4. The women have underlined the importance of peace and reconciliation, love and forgiveness, and praying to God together for mercy and grace. Women will return and commit to warning their sons to stop raiding other communities. If a problem persists, they have warned they will milk out the milk from their breasts to the floor as a curse to the young men who have violated the peace.

5.5. Women from the three communities must stand up to ensure that this peace is holding, particularly through advocacy and moving between locations, talking to people. Women must unite, regardless of their tribe. They should be provided with communication tools, as well as the men. Women have requested radio talk shows to publicise the message of peace among the three tribes; to be known nationwide, regionally, and globally.

5.6. Women propose the formation of a Women's Peace Committee, and three (one from each community) appointed as an initial Steering Committee. They request being given a uniform of the same colour and this committee is the one to move from Dinka Bor to Murle to Lou Nuer as a Committee that preaches peace. If the women are together in a location, youth may also fear to attack.

5.7. Women will encourage inter-marriages between the three tribes; they are the guardians of the daughters.

5.8. Youth leaders requested three Thuraya phones, or a general improvement to mobile network coverage, to facilitate their work of collecting the abducted children, curb cattle raiding and related criminal activities.

5.9. The Conference agreed that a representative delegation from the Pieri meeting would travel to Juba to disseminate the Action for Peace among the Country's leadership.

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**Implementation**

**UN signatory** No specific mention.

**Other international signatory** No specific mention.

**Referendum for agreement** No specific mention.

**International mission/force/similar** No specific mention.

**Enforcement mechanism** No specific mention.

**Related cases** No specific mention.

**Source** No specific mention.

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