

**Aceris Law LLC's Quick Reference Guide:
Limitation Periods for Recognition and Enforcement of Foreign Awards¹**

Country	Limitation Period	Starting Point	Statute
Albania	10 years (unless a shorter period is specified by law for the particular dispute).	From the date the award becomes final.	Law No. 8116 dated 29 March 1996, Civil Procedure Code, as amended.
Algeria	15 years	From the day the award becomes enforceable.	Act No. 08-09 of 25 February 2008, Algerian Code of Civil Procedure, in force from 23 April 2008, Article 630.
Angola	None	N/A	N/A
Argentina	5 years (general time limit for contractual obligations).	From the date on which creditors may exercise their rights.	Civil and Commercial Code, Article 2560.
Australia	There are two relevant limitation periods: 1. a limitation period to recognize a foreign award as a judgment of an Australian court; 2. a limitation period to enforce the resulting Australian judgment.		
	1. Limitation Period to Recognize a Foreign Award as a Judgment of an Australian Court		
<ul style="list-style-type: none"> • <i>New South Wales, Queensland, Western Australia, Tasmania (& territories)</i> 	12 years (where the arbitration agreement is made by deed) or 6 years (in any other case).	From the first default for which enforcement is sought.	Limitation Act 1985 (Australian Capital Territory) s. 17; Limitation Act 1969 (New South Wales), s. 20(2); Limitation of Actions Act 1974 (Queensland), ss. 10(1), (3); Limitation Act 2005 (Western Australia), ss. 13, 18; Limitation Act 1974 (Tasmania), s. 4.
<ul style="list-style-type: none"> • <i>Victoria & South Australia</i> 	15 years (where the arbitration agreement is made by deed) or 6 years (in any other case).	From the first default for which enforcement is sought.	Limitation of Actions Act 1958 (Victoria), ss. 5(1),(3); Limitation of Actions Act 1936 (South Australia), ss. 34-35.
<ul style="list-style-type: none"> • <i>Northern Territory</i> 	12 years (where the arbitration agreement is made by deed) or 3 years (in any other case).	From the first default for which enforcement is sought.	Limitation Act (Northern Territory), s. 18.

¹ Based on the third edition of the ICC Guide to National Procedures for Recognition and Enforcement of Awards under the 1958 New York Convention (the “NYC”), which reflect the state of the various national laws as they stand on 1 October 2018.

**Aceris Law LLC's Quick Reference Guide:
Limitation Periods for Recognition and Enforcement of Foreign Awards¹**

Country	Limitation Period	Starting Point	Statute
2. Limitation Period to Enforce the Resulting Australian Judgment			
• <i>New South Wales</i>	12 years	From the date the award first becomes enforceable.	IAA, ss. 8(2), 8(3); Limitation Act 1969 (New South Wales), s. 17(1).
• <i>Victoria</i>	15 years	From the date the award became enforceable.	IAA, ss. 8(2), 8(3); Limitation of Actions Act 1958 (Victoria), s. 5(4).
• <i>Northern Territory</i>	12 years	From the date the award first becomes enforceable.	IAA, ss. 8(2), 8(3); Limitation Act 1981 (Northern Territory), s. 15(1).
• <i>Queensland</i>	12 years	From the date the award first becomes enforceable.	IAA, ss. 8(2), 8(3); Limitation of Actions Act 1974 (Queensland), s. 10(4).
• <i>Tasmania</i>	12 years	From the date the award first becomes enforceable.	IAA, ss. 8(2), 8(3); Limitation Act 1974 (TAS), s. 4(4).
• <i>Western Australia</i>	6 years	From the date of accrual of the cause of action, i.e., the date when default in observance of the award first occurs.	IAA, ss. 8(2), 8(3); Limitation Act 2005 (Western Australia), s. 13(1), 64.
• <i>Australian Capital Territory</i>	12 years	From the date when the award first becomes enforceable.	IAA, ss. 8(2), 8(3); Limitation Act 1985, s. 14(1) (Australian Capital Territory).
• <i>South Australia</i>	15 years	From the date of accrual of the cause of action.	IAA, ss. 8(2), 8(3); Limitation of Actions Act 1936 (South Australia), ss. 34, 35.
Austria	Not specified, yet prudent to apply 30 years by analogy (limitation period for enforcing judgments).	From the date of the award.	Regulation of the Austrian Federal Ministry of Justice dated 21 July 1858 in respect of limitation periods (Verordnung des Justizministeriums vom 21. Juli 1858 zur Verjährungsfrist), RGeBl. No. 105/1858, published 24 July 1858.
Bahrain	Not specified.	N/A	N/A

**Aceris Law LLC's Quick Reference Guide:
Limitation Periods for Recognition and Enforcement of Foreign Awards¹**

Country	Limitation Period	Starting Point	Statute
Belgium	<p>10 years (for arbitrations commenced after 1 September 2013). Prior to that, not specified, yet by analogy (limitation periods for judicial claims):</p> <p>30 years (for arbitrations commenced prior to 1 September 2013 related to immovable rights); or</p> <p>10 years (for arbitrations commenced prior to 1 September 2013 related to rights <i>in personam</i>).</p>	<p>From the date the award is communicated to the parties.</p> <p>From the date of the award.</p> <p>From the date of the award.</p>	<p>Judicial Code, Article 1722.</p> <p>Civil Code, Article 2262.</p> <p>Civil Code, Article 2262.</p>
Bolivia	Not specified, yet prudent to apply 5 years by analogy (general Bolivian limitation period).	From the date the award was formally notified to the parties.	Civil Code, Articles 1503, 1507.
Brazil	Not specified, yet prudent to apply 10 years for both recognition and enforcement by analogy (general Brazilian limitation period; shorter time limits apply to certain claims, i.e., for insurance claims: 1 year).	<p>From the date the award was formally notified to the parties (for recognition).</p> <p>From the day following the publication of the STJ's decision recognizing the award in the Official Gazette (for enforcement).</p>	Brazilian Code of Civil Procedure, Article 965; Supremo Tribunal de Federal Ruling No. 150; Brazilian Civil Code, Articles 205, 206.
Brunei	6 years	From the date the judgment became enforceable.	Limitation Act (CAP 14), s. 46.
Bulgaria	Not specified, yet prudent to apply 5 years .	From the date of the award.	Private International Law Code, Article 63; Law on Obligations and Contracts, Article 117(2).
Cameroon	Not specified; yet prudent to apply 30 years by analogy (limitation period for enforcement of judgments).	From the date of the award.	Civil Code, Article 2262.
Canada	6 years (before Federal Court; yet varies in individual provinces).	From the date of the award (yet not clearly specified).	Federal Courts Act, s. 39(2); <i>Compania Maritima Villa Nova S.A. v. Northern Sales Co.</i> , [1992] 1 F.C. 550 (C.A.); Federal Courts Rules, r. 329(1)(h).

**Aceris Law LLC's Quick Reference Guide:
Limitation Periods for Recognition and Enforcement of Foreign Awards¹**

Country	Limitation Period	Starting Point	Statute
Chile	Not specified, yet prudent to apply 5 years by analogy (limitation period for enforcement of domestic judgments and awards).	From the date the award became final under the law of the country where it was made.	Civil Code, Articles 2514, 2515.
China	2 years	From the last day of the period specified in the award for its performance; and if no such period is specified, from the day when the award takes effect.	Civil Procedure Law 2017, Article 239; 2015 Supreme People's Court's Interpretation of the Civil Procedure Law, Article 547.
Colombia	Not specified for recognition. 5 years for enforcement once recognized (by analogy from domestic judgments).	From the date the award become final.	Civil Code, Articles 15, 2535, 2536.
Costa Rica	4 years	From the date the award is enforceable or became final under the law of the country where it was made.	Law No. 9342, Article 26; Law No. 3284, Article 874, 984.
Croatia	Not specified, yet prudent to apply 10 years (for enforcement, by analogy from final court judgments).	From the expiry of the time for voluntary compliance with the award.	Execution Act, Article 46, 50(1)/11; Law on Obligations, Article 233, para. 1.
Cyprus	Not specified, arguably between 6-10 years .	From the last moment the debtor party should have complied with the award.	Cyprus – Prescription of Causes of Action Law N. 66(I)/2012, ss. 4, 7, 10; United Kingdom – Limitation Act 1980, ss. 7, 8; <i>National Ability SA v Tinna Oils & Chemicals Ltd, The Amazon Reefer</i> [2010] 1 Lloyd's Rep. 222, <i>ED&F Man Sugar Ltd v Lendoudis</i> [2007] EWHC 2268 (Comm).
Czech Republic	Not specified, arguably 10 years (if conflict-of-laws rules lead to the application of Czech substantive law, as limitation periods are considered matters of substance, rather than procedure).	From the date the award becomes enforceable, i.e., on the day following the expiry of the period for performance.	Law No. 89/2012 Coll., Articles 1, 46, 640-642, 648.
Denmark	Not specified, arguably 10 years by analogy (limitation period for monetary claims)	From the date on which the creditor may claim	Consolidated Act No. 1238 of 9 November 2015 on the limitation of monetary claims, ss. 2, 5, 16,

**Aceris Law LLC's Quick Reference Guide:
Limitation Periods for Recognition and Enforcement of Foreign Awards¹**

Country	Limitation Period	Starting Point	Statute
	established by binding decision).	payment (the due date) under the award.	19(3), 30(1); Act No. 274 of 22 December 1908.
Dominican Republic	Not specified.	N/A	N/A
Ecuador	10 years	From the moment the award becomes <i>res judicata</i> under the law of the place of the arbitration (for recognition). From the moment the award is recognized in Ecuador (for enforcement).	Civil Code, Articles 2414, 2415.
El Salvador	No limit (for recognition) yet 2 years might apply by analogy; 2 years (for enforcement).	From the time the award becomes definitive.	Code of Civil and Commercial Procedure, Article 553.
Estonia	Not specified, yet arguably 10 years by analogy (same as general rule that a claim recognized by an enforceable deed expires after ten years).	From the date when the award was rendered.	General Part of the Civil Code Act, Article 157(1),(2).
Finland	Not specified, yet arguably 5 years by analogy (same as court judgments) or as specified by the law of the place where the award was issued.	From the date of the award.	Law on the Expiry of Debts 728/2003, Article 13.
France	Not specified, yet arguably: 30 years (for awards rendered before 17 June 1983); or 5 years (for awards rendered between 17 June 1983 and 17 June 2008); or 5 years (for awards rendered after 17 June 2008).	From the date of notification of the award to the parties. From 17 June 2008. From date of notification of the award to the parties.	Civil Code, Article 2224, as modified by law 2008-561 of 17 June 2008.
Germany	None	* Yet, unclear whether the German Code of Civil Procedure allows a defence to be brought against an application to enforce a foreign award in Germany, if the limitation period for setting aside such an award at the seat of the arbitration has expired.	

**Aceris Law LLC's Quick Reference Guide:
Limitation Periods for Recognition and Enforcement of Foreign Awards¹**

Country	Limitation Period	Starting Point	Statute
Greece	None	N/A	Athens Court of Appeal, No. 1390/1972, Nomiko Vima 1972, p. 1324.
Guatemala	None, yet arguably 5 years or 10 years by analogy.	From the date the award was issued.	Civil and Commercial Procedural Code, Article 296, which provides that a judgment will no longer be binding from 5 years after it has been issued if it contains an unsecured obligation, and 10 years after it has been issued if it contains an obligation secured with a mortgage or a pledge.
Hong Kong	6 years or 12 years (if the arbitration agreement is made under seal).	From the date of failure to honor the award.	Limitation Ordinance (Cap. 347, Laws of Hong Kong), s. 4; Arbitration Ordinance (Cap. 609, Laws of Hong Kong), ss. 14, 84, 87.
Hungary	None, yet arguably 5 years (limitation period applicable to claims).	When the time set in the award for payment has passed without payment being made.	Enforcement Act, s. 57; Civil Code, s. 6:22.
India	Not specified, court decisions vary, e.g., 3 or 12 years .	From the date the right to apply for such recognition and enforcement accrues, i.e., the date the foreign award becomes final and binding between the parties in the jurisdiction where it was made.	Limitation Act, 1963 (Act 36/1963), Schedule, Articles 136, 137; <i>Noy Vallesina Engineering SPAA Corporation v. Jindal Drugs Limited</i> (Bombay High Court; 2006 (3) Arb. LR 510); <i>Compania Naviera v. Bharat Refineries</i> (Madras High Court; AIR 2007 Mad 251).
Indonesia	None	N/A	N/A
Iran	None	N/A	N/A
Ireland	6 years or 12 years (if the arbitration agreement is made under seal).	From the date on which the cause of action accrued.	Statute of Limitations, 1957, ss. 11 (1) (d) & (5) (b).
Israel	Not specified.	* It follows from a Supreme Court decision rendered in a domestic case that Israeli courts may deny such requests if filed many years after the award was rendered under circumstances amounting to a breach of the procedural duty of good faith by the party seeking enforcement; CPA Permission for Civil Appeal, <i>The Major Synagogue 'Shore Halachot' v. Netania Municipality</i> , 11 September 2007 (Israel Supreme Court).	

**Aceris Law LLC's Quick Reference Guide:
Limitation Periods for Recognition and Enforcement of Foreign Awards¹**

Country	Limitation Period	Starting Point	Statute
Italy	Not specified, yet arguably 10 years by analogy (same as ordinary statute of limitation).	From the date a court action can be brought, i.e., when the foreign award has become binding.	Civil Code, Article 2946.
Japan	None	N/A	N/A
Jordan	15 years	From the date of the issuance of the award.	Law of the Enforcement of Foreign Judgments, No. 8 of 1952 (Official Gazette No. 1100, 16 Feb. 1952).
Kenya	6 years	From the date when the award becomes binding on the party against whom it is intended to be enforced, i.e., all challenges and/or appeals have been concluded.	
Korea	10 years	From the date of the award.	Arbitration Act, Article 35; Civil Act, Article 165, para. 2.
Kuwait	15 years	From the date of issuance of the award	
Lebanon	Not specified, yet arguably 10 years (same as judgments)	From the date the award was rendered.	Lebanese Code of Obligations and Contracts, Articles 344, 349.
Lithuania	Not specified, yet arguably 5 years by analogy (as the execution writ issued by the court after its judgment recognizing and allowing enforcement of an award must be submitted for execution within 5 years from when the award takes effect).	From the time the award takes effect.	Code of Civil Procedure No. IX-743, 28 February 2002, Official Gazette 2002, No. 36-1349, 42, Art. 606 Pt 2.; Law on Commercial Arbitration No. I-1274, 2 Apr. 1996, Official Gazette 1996, No. 39-961, 45, Art. 41 Pt 5, 7.
Luxembourg	Not specified, yet arguably 30 years (same as judgments).	From the date of the award.	Civil Code, Article 2224, 2262.
Malaysia	None	N/A	N/A
Mauritius	None	N/A	N/A
Mexico	Not specified, yet arguably 10 years (generic time limit for all actions).	From the date the final award is notified to the party requesting enforcement of the award	Commerce Code, Articles 1419, 1040, 1047, 1419; Federal Code of Civil Procedures, Article 1159.

**Aceris Law LLC's Quick Reference Guide:
Limitation Periods for Recognition and Enforcement of Foreign Awards¹**

Country	Limitation Period	Starting Point	Statute
Monaco	None typically, yet arguably 30 years .	Since the applicant obtained an enforceable writ of execution for the award from the courts of Monaco.	Code of Civil Law, Article 2082.
Mongolia	None	N/A	N/A
Morocco	None	* Yet, if rendered in Morocco, the award must be recorded/registered at the commercial court within 7 days of the issuance of the award. If rendered abroad, the time limit is as set forth in the relevant legislation in force in the country in which the award was rendered; Moroccan Code of Civil Procedure, as modified by Law No. 08-05; Articles 327.31, 327.32.	
Netherlands	20 years	From the day following that of the decision or, if conditions have been set for its enforcement (the fulfilment of which does not depend on the will of the person who obtained the decision), from the day following that on which such conditions were fulfilled.	Dutch Civil Code, Article 3:324.
New Zealand	6 years , which may be waived by the court if considered just to do so (exceptions and extensions apply in cases of setting aside, minority, incapacity, acknowledgement of the debt, part-payment or fraud).	From the date on which the award became enforceable by action in New Zealand.	Limitation Act 2010, s. 36; Part 4 (ss. 39(4), 44-48).
Nigeria	6 years	From the date of accrual of the cause of action leading to the arbitration, in which the award was made.	<i>City Engineering Nigeria Limited v. Federal Housing Authority</i> [1997] 9 NWLR (Pt 520) 244; <i>see also Tulip Nigeria Ltd v. Noleggioe Transport Maritime S.A.S</i> (2011) 4 Nigerian Weekly Law Report, Pt 1237, p. 254; <i>Murmansk State Steamship v. Kano Oil Millers Limited</i> (1974) All Nigeria Law Report 893.

**Aceris Law LLC's Quick Reference Guide:
Limitation Periods for Recognition and Enforcement of Foreign Awards¹**

Country	Limitation Period	Starting Point	Statute
Pakistan	3 years	From the date of the award.	Limitation Act 1908, Article 181.
Panama	Not specified, yet arguably 7 years by analogy (same as general Panamanian limitation period).	From the date the award became firm as <i>res judicata</i> .	Civil Code, Articles 1701, 1709.
Peru	10 years	From the date the action can be initiated, i.e., the date the award was rendered.	Legislative Decree No. 295 (Peruvian Civil Code), Articles 1993, 2001(1).
Philippines	Not specified, yet arguably 10 years by analogy (same as general limitation periods for initiating suits).	From the date on which the cause of action accrued.	Civil Code, Article 1144; <i>see also</i> Custodio Parlade, author of the chapter on the Philippines in Arbitration in Asia (M. Moser (ed.), 2nd ed., 2010, § 2.2.
Poland	Not specified, yet arguably, if the claim is governed by Polish substantive law, by analogy, either 6 years ; or 3 years (if the claim is also for periodic performances).	From the date of service of the award on the party. From the date of the award.	Civil Code, Article 125.
Portugal	None	N/A	N/A
Qatar	10 years (for commercial awards); 15 years (for all other awards).	From the date of issuance of the award.	Law No. 27 of 2006 (Commercial Code), Article 87; Law No. 22 of 2004 (Civil Code), Article 415/2.
Romania	None	Yet, enforcement will not be granted if the right to seek enforcement of that award is barred under the law of the State where the seat of the arbitration is situated; CPC, Articles 1.104 para. 1, 1.100, 1.129(f).	
Russia	3 years (yet, even if expired, it may be restored by the Arbitrazh court, upon the applicant's request, for a valid reason for non-compliance with the limitation period.)	From the date on which the award entered into legal force.	Arbitrazh Procedural Code, Article 246.
Senegal	Not specified, yet arguably 10 years by analogy (same as general time limit for legal actions) or 5 years (applying to commercial matters).	From the date of notification of the award to the parties.	

**Aceris Law LLC's Quick Reference Guide:
Limitation Periods for Recognition and Enforcement of Foreign Awards¹**

Country	Limitation Period	Starting Point	Statute
Serbia	Not specified, yet arguably 10 years by analogy (same as judgments).	From the date the award becomes final and binding on the parties, running on the first day following the date of the award.	Code of Obligations, Article 379(1).
Singapore	6 years	From the date it becomes binding on the parties.	International Arbitration Act, s. 8A; Limitation Act (Cap. 163), s. 6.
Slovakia	10 years	From the date the debtor was to perform under the award, provided that the award has been delivered to all parties and is final.	Civil Code, Article 110.
Slovenia	10 years (only for awards subject to Slovenian substantive law, as the limitation periods are considered matters of substantive and not procedural law). Also, the defence of statute of limitations must be invoked and is not applied <i>ex officio</i> .	From the date the debtor was to perform according to the award, provided that the award has been delivered to all parties and is final.	Obligations Code, Official Gazette of the Republic of Slovenia, No. 83/2001.
South Africa	Unclear, variously said to be 3 or 4 years .	From the date of publication of the award, i.e., from the date the tribunal delivers the final, binding award to the parties or their representatives.	Prescription Act 68 of 1969; <i>Primavera Construction SA v Government, North-West Province</i> , 2003(3) SA 579 TPD; <i>Society of Lloyds v. Price</i> ; <i>Society of Lloyds v. Lee</i> , 2005(3) SA 549 (T); <i>Myathaza v Johannesburg Metropolitan Bus Services (SOC) Limited t/a Metrobus and Others</i> , 2017 (4) BCLR 473 (CC).
Spain	5 years (for enforcement; not specified (for recognition)).	Unclear: either from the moment the award is recognized in Spain or from the moment the award has become final.	Law 29/2015, of 30 July 2015, on International Judicial Cooperation on Civil Matters, Article 50; Civil Procedure Law 1/2000 of 7 January 2000, Article 518; Decision of the Court of Appeal of Zamora, 27 November 2009 and Decision of the Court of Appeal of Soria, 19 December 2011.

**Aceris Law LLC's Quick Reference Guide:
Limitation Periods for Recognition and Enforcement of Foreign Awards¹**

Country	Limitation Period	Starting Point	Statute
Sweden	None	N/A	N/A
Switzerland	Not specified.	* Limitation periods are considered to be a matter of substance, rather than procedure. That said, Swiss courts may refuse to enforce a foreign award on the ground that the claim(s) under the award have become time-barred under the applicable substantive law of the country in question (i.e., Swiss or other substantive law applicable to the facts of the case).	
Thailand	3 years	From the date on which the award becomes enforceable, i.e., normally, on the date it was rendered.	Arbitration Act, s. 42.
Tunisia	None, yet arguably 20 years .	* A general rule in the Code of Civil and Commercial Procedure provides that any judgment becomes without effect 20 years after it is rendered.	
Turkey	Not specified, yet arguably 10 years (same as judgments).	From the date the judgment was served on the party seeking enforcement.	Turkish Enforcement and Bankruptcy Law, No. 2004, 19 June 1932, Article 39; Baki Kuru, Civil Procedure Law, 6th ed., Istanbul 2001, vol. III, p. 3160.
Ukraine	3 years	From the date the award was rendered.	Code of Civil Procedure of Ukraine, 18 March 2004, No. 1618-IV, Article 475(3).
United Arab Emirates	None	N/A	N/A
United Kingdom	6 years or 12 years (if the arbitration agreement is made under seal). Yet, if on enforcement of the award the law of another country falls to be taken into account, the Foreign Limitation Periods Act 1984 provides that the law of that other country relating to limitation shall apply.	From the date of failure to honor the award.	Limitation Act 1980, ss. 7, 8; Foreign Limitation Periods Act 1984, ss. 1-4; <i>Agromet Motoimport Ltd v. Maulden Engineering Co. (Beds) Limited</i> [1985] 2 All E.R. 436; <i>The Good Challenger</i> [2004] 1 Lloyd's Rep. 67, 71; <i>National Ability SA v. Tinna Oils & Chemicals Ltd</i> [2009] EWCA Civ 1330.
United Kingdom Scotland	20 years	From the date the award becomes enforceable, i.e., the date the award is delivered to one of the parties to the arbitration.	Prescription and Limitation (Scotland) Article 1973, s. 7.

**Aceris Law LLC's Quick Reference Guide:
Limitation Periods for Recognition and Enforcement of Foreign Awards¹**

Country	Limitation Period	Starting Point	Statute
United States of America	Generally, 3 years (but may vary based on state laws).	From the date the award is made, i.e., the date that it is issued.	9 U.S.C. § 207; <i>Seetransport Wiking Trader Schiffahrtsgesellschaft MBH & Co., Kommanditgesellschaft v. Navimpex Centrala Navala</i> , 989 F.2d 572 (2d Cir. 1993).
Uruguay	None (yet, the defendant may file a defence based on a statute of limitations or expiry of the obligation whose enforcement is sought.)	N/A	N/A
Venezuela	10 years	From the date the parties are notified that the award has been rendered.	Civil Code, Article 1977.
Vietnam	3 years	From the date the award has legal effect, i.e., the date of its issuance.	Civil Procedure Code, Article 451.1; Law on Commercial Arbitration no. 54/2010/QH12 of the National Assembly, Article 61.5.