



## WHITE & CASE

### IFRC COVID-19 Emergency Decree Pro Bono Research: Gambia

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#### **1. Is there coordination between state and non-state actors, e.g. through a national emergency response mechanism?**

Yes. Gambia is coordinating with non-state actors in response to the coronavirus and has national legislation that facilitates coordination between state and non-state actors during emergencies, including emergencies of public health concern like the coronavirus pandemic.

Gambia's President, Ministry of Health ("MoH") and National Disaster Management Agency ("NDMA") appear to be leading Gambia's national emergency response to the coronavirus.<sup>1</sup> Gambia is coordinating with several non-state actors, including the World Health Organization ("WHO"), the Africa Centre for Disease Control and Prevention ("ACDC"), the West African Health Organisation ("WAHO"), the United States Center for Disease Control and Prevention ("US CDC"), local partners, the Gambian Red Cross Society ("GRCS"), the International Monetary Fund ("IMF") and the media.

Gambia adopted the WHO standard case definition protocols and guidelines for classifying whether an individual has contracted COVID-19.<sup>2</sup> Gambia's MoH appears to be submitting "situation reports" on coronavirus cases in Gambia to WHO on a regular, almost daily, basis.<sup>3</sup> Gambia is otherwise coordinating with WHO, ACDC, WAHO, US CDC and local partners to mobilize resources and develop policies in connection with "case detection and management, sample collection and transportation to designated

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<sup>1</sup> See, e.g., Mustapha K Darboe, *Gambia suspends parliament over coronavirus*, Anadolu Agency (Mar. 19, 2020), <https://www.aa.com.tr/en/africa/gambia-suspends-parliament-over-coronavirus/1771193> (addressing presidential responses to the coronavirus); *Ministry of Health (MoH), World Health Organization and Partners are Working to Strengthen Preparedness and Response Capacity of The Gambia Against the 2019 novel coronavirus*, WHO Africa (last accessed Mar. 30, 2020), <https://www.afro.who.int/news/ministry-health-moh-world-health-organization-and-partners-are-working-strengthen-preparedness> [hereinafter WHO Africa Report] (explaining the MoH's role in responding to the coronavirus); Gambia Red Cross Society et al., *International Disaster Response Law (IDRL) in The Gambia* 30 (2016), available at <https://www.ifrc.org/Global/Publications/IDRL/IDRL%20Report%20The%20Gambia.pdf> [hereinafter Gambia IDRL Report] (explaining that Gambia's National Disaster Management Act 2008 established NDMA "as a body corporate in April 2009 to coordinate all disaster related issues in the country in close collaboration with all relevant partners"); *Covid-19: NDMA donates public sanitary materials worth D200, 000 to institutions*, The Point (Mar. 27, 2020), <http://thepoint.gm/africa/gambia/article/covid-19-ndma-donates-public-sanitary-materials-worth-d200-000-to-institutions> (explaining that the NDMA "is responsible for humanitarian coordination and . . . their primary responsibility [is] to help the state in curbing the deadly disease").

<sup>2</sup> WHO Africa Report.

<sup>3</sup> MoH, *COVID-19* (last accessed Mar. 29, 2020), [www.moh.gov.gm/covid-19-report](http://www.moh.gov.gm/covid-19-report).

laboratories.<sup>4</sup> The GRCS is providing ambulance services<sup>5</sup> and distributing information about COVID-19<sup>6</sup> in Gambia.

On March 23, 2020, the IMF approved a 39-month Extended Credit Facility arrangement for Gambia in the amount of SDR35 million (approximately US\$47.1 million).<sup>7</sup> The arrangement aims to anchor macroeconomic stability while supporting the Government in responding to the coronavirus.<sup>8</sup>

Gambia's Minister of Health, Dr. Ahmadou Lamin Samateh, said the media will play a crucial role and assured the media that the Government's "doors are always open."<sup>9</sup> On March 23, 2020, the APO Group (a media consulting business in Africa and the Middle East) said it "will support the dissemination of coronavirus-related information from African governments [including Gambia] to the press and public."<sup>10</sup>

Historically, civil society and the private sector have also provided non-state-actor assistance in Gambia during national emergencies. Civil society organizations in Gambia have been "recognised by the government as invaluable partners in disaster management,"<sup>11</sup> and the private sector has given "humanitarian assistance in close coordination with" the Government.<sup>12</sup>

Under Gambian law, the National Disaster Management Act 2008 ("NDM Act" or "Act") provides a legal framework for responding to emergencies and facilitates coordination between state and non-state actors.<sup>13</sup> The Act authorizes the President to declare an emergency and request international disaster relief,<sup>14</sup> and establishes the National Disaster Management Agency, which is responsible for coordinating with non-state actors or international relief organizations.<sup>15</sup> However, the Act does not comprehensively regulate the process for obtaining international relief assistance,<sup>16</sup> and the Gambian legal system as a whole has few "clear guidelines and standard operating procedures in place to enhance . . . effective coordination of international assistance."<sup>17</sup>

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<sup>4</sup> WHO Africa Report.

<sup>5</sup> *BBC donates ambulance to Banjul Red Cross*, The Point (Mar. 27, 2020), <http://thepoint.gm/africa/gambia/article/bcc-donates-ambulance-to-banjul-red-cross>; see also *Gambia Confirms Third Case Of Coronavirus*, Foroyaa (Mar. 25, 2020), <https://foroyaa.gm/gambia-confirms-third-case-of-coronavirus/> (referencing Red Cross ambulance transporting infected patient to treatment facility).

<sup>6</sup> Gambia Red Cross Twitter page (last accessed Mar. 30, 2020), [https://twitter.com/GambiaRedCross?ref\\_src=twsrc%5Egoogle%7Ctwcamp%5Eserp%7Ctwgr%5Eauthor](https://twitter.com/GambiaRedCross?ref_src=twsrc%5Egoogle%7Ctwcamp%5Eserp%7Ctwgr%5Eauthor).

<sup>7</sup> *IMF Executive Board Approves US\$47.1 million Extended Credit Facility (ECF) Arrangement for The Gambia*, IMF (Mar. 23, 2020), <https://www.imf.org/en/News/Articles/2020/03/23/pr2099-gambia-imf-executive-board-approves-usd47-1-million-ecf-arrangement>.

<sup>8</sup> *Id.*

<sup>9</sup> WHO Africa Report.

<sup>10</sup> *Coronavirus: APO Group to support African governments in the fight against COVID-19*, APO Group (last accessed Mar. 30, 2020), <https://apo-opa.com/coronavirus-apo-group-to-support-african-governments-in-the-fight-against-covid19/>.

<sup>11</sup> Gambia IDRL Report 43; see also *id.* (stating that the "NDM Act 2008 and Policy clearly recognizes the important role of non-state actors in the delivery of humanitarian assistance during and after disasters" and that in Gambia there is "an enabling environment for NGOs and civil society actors to do an effective job of responding to humanitarian needs").

<sup>12</sup> Gambia IDRL Report 54. Donations from the private sector to the Agency are permitted to the extent they do not contain attached conditions. *Id.*

<sup>13</sup> Gambia IDRL Report 30 ("The NDM Act 2008 provides for an integrated and coordinated disaster management framework focusing on prevention, preparedness, response, mitigation, and recovery from disaster or emergency situations, and the management of their effects.").

<sup>14</sup> Gambia IDRL Report 40-41; see also *Laws of The Gambia, Volume 1 [Act No. 1 of 1997]*, Section 34, p31 (providing presidential power to declare emergencies).

<sup>15</sup> Gambia IDRL Report 32.

<sup>16</sup> Gambia IDRL Report 38.

<sup>17</sup> Gambia IDRL Report 39.

**2. Is there mention of the role of Red Cross (RC) or humanitarian actors? In what areas/sectors? What responsibilities are ascribed to RC?**

Yes. There are mentions of the roles of various humanitarian actors in Gambia, including the GRCS, as described in response to Question 1 and various questions below.

Under Gambian law (and in addition to the NDM Act), the Gambia Red Cross Society Act 1966 requires the Gambia Red Cross Society “to be ready to . . . supplement official services engaged in relief work or in promoting the health and welfare of the people of” Gambia during emergencies.<sup>18</sup> The Act recognizes that other organizations may be engaged in similar work and requires the GRCS to be ready to coordinate with them.<sup>19</sup> The GRCS “performs its auxiliary role independent of government interference.”<sup>20</sup>

**3. Are there exceptions to travel restrictions that will facilitate the movement of RC/humanitarian relief teams and/or aid across borders? What (if any) quarantine requirements or other conditions are attached?**

Yes. While Gambia closed its border with Senegal and suspended all airspace travel for 21 days on March 23, 2020,<sup>21</sup> the border closure provides an exception for “essential services, such as movement of security personnel, foodstuff, medical services, related items and equipment between the two countries,”<sup>22</sup> and the airspace suspension provides an exception for medical cargo flights.<sup>23</sup>

Previously, on March 19, 2020, Gambia suspended flights from the following 13 countries: the United Kingdom, Spain, France, Poland, Germany, Sweden, Denmark, Switzerland, the Netherlands, Norway, Austria, Belgium and Portugal.<sup>24</sup> Gambia also required the all individuals traveling from the following 47 countries to undergo mandatory quarantine for 14 days: China, Republic of Korea, Japan, Malaysia, Australia, Singapore, Philippines, Indonesia, Thailand, India, Italy, Spain, France, Germany, Switzerland, the United Kingdom, the Netherlands, Norway, Austria, Belgium, Sweden, Denmark, Czech, Greece, Portugal, Israel, Finland, Slovenia, Ireland, Estonia, Iceland, Romania, Poland, San Marino, Islamic Republic of Iran, Qatar, Bahrain, Pakistan, Egypt, Saudi Arabia, Kuwait, Iraq, Lebanon, United States of America, Canada, Brazil and Chile.<sup>25</sup> It is unclear if these restrictions provided exceptions for humanitarian relief.

Under Gambian law, there is no “provision for the expedited provision of visas and work permits for humanitarian personnel in the case of disaster response or initial recovery assistance.”<sup>26</sup> Rather, the Director of Immigration has some authority to waive border-crossing requirements on an ad hoc basis.<sup>27</sup> While Gambian law does not otherwise appear to provide express exceptions to travel restrictions for humanitarian organizations, certain mechanisms may allow humanitarian movement within the country, the shipment of supplies (including by air), and categorization of humanitarian organizations as “essential” when responding to emergencies. These mechanisms are discussed in response to Questions 4-6.

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<sup>18</sup> The Gambia Red Cross Society Act states purposes of the GRCS, including “improvement of health” and “prevention of disease.” Laws of The Gambia, [Act No. 7 of 1966], Section 4, p4, available at <https://ihl-databases.icrc.org/ihl-nat/0/22FFE2A3DEE10008412571110036A86B>. The Gambia Red Cross Society Act states purposes of the GRCS, including “improvement of health” and “prevention of disease.” *Id.*

<sup>19</sup> *Id.*

<sup>20</sup> Gambia IDRL Report 42.

<sup>21</sup> *Gambia closes airspace and land borders*, The Point (Mar. 23, 2020), [http://thepoint.gm/africa/gambia/article/gambia-closes-airspace-and-land-borders\\_](http://thepoint.gm/africa/gambia/article/gambia-closes-airspace-and-land-borders_)

<sup>22</sup> *Id.*

<sup>23</sup> *Id.*

<sup>24</sup> *COVID-19: Gambia suspends flights from 13 countries*, The Point (Mar. 20, 2020), <http://thepoint.gm/africa/gambia/article/covid-19-gambia-suspends-flights-from-13-countries>.

<sup>25</sup> *Id.*

<sup>26</sup> Gambia IDRL Report 72.

<sup>27</sup> Gambia IDRL Report 73.

Under international law, Gambia is a party to at least two international treaties that afford border-crossing privileges to humanitarian organizations. Under the Convention on International Civil Aviation, “the Director General of the Civil Aviation shall facilitate the entry into, departure from and transit through the Gambian territory of aircraft engaged in relief flights, as well as ensuring that personnel and articles arriving on relief flights are cleared without delay.”<sup>28</sup> The Economic Community of West African States (“ECOWAS”) has a Protocol Relating to Free Movement of Persons, Residence and Establishment that allows “relief workers who are citizens of other ECOWAS countries [to be] deployed to a disaster relief operation in The Gambia.”<sup>29</sup>

#### **4. Are there exceptions to quarantines, curfews and other restrictions on movement that allow RC/humanitarian organizations access to vulnerable populations (including for psychosocial or non-medical aid)?**

As at the time of writing, there appear to be few express exceptions to quarantines, curfews and other restrictions on movement that allow RC/humanitarian organizations access to vulnerable populations. As noted in response to Question 1, however, the GRCS is providing ambulance services in Gambia.

Under Gambian law, there are no specific policies that grant “access to disaster-affected persons” to humanitarian organizations.<sup>30</sup> However, the NDM Act authorizes the President to declare a public emergency and the NDMA to provide direction on “access to and freedom of movement during a major emergency or disaster to any person or agency and by extension international relief agencies.”<sup>31</sup>

#### **5. Have any special legal facilities or exemptions been put in place for the importation of medical aid or other relief items or personnel (International Disaster Response Law)? What (if any) quarantine requirements or other conditions are attached?**

Yes. Gambia has issued exceptions for importing relief items as set forth in the answer to Question 3. Gambia has accepted medical supplies from the Chinese Ambassador to Gambia to combat the coronavirus.<sup>32</sup> The medical supplies include facemasks, testing kits, and protective clothing and shields.<sup>33</sup>

Under Gambian law, there are few express provisions on importing relief items. The NDM Act does not have “any specific provisions relating to customs arrangements for relief items.”<sup>34</sup> While not in the disaster context, Gambia’s Customs Act may allow the Minister of Finance and Economic Affairs to “fast track the entry and clearance of relief” items and exempt such items from taxes and duties.<sup>35</sup> Gambia’s aviation laws<sup>36</sup> do not have special provisions on aircraft bearing relief items, but “some of the provisions are flexible” and could “facilitate relief flights.”<sup>37</sup> Gambia’s Medicines Act does not contain provisions on importing medications for disaster relief, but Gambia’s Minister of Health may have the “power to make

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<sup>28</sup> Gambia IDRL Report 26. Gambia acceded to The Convention on International Civil Aviation (“Chicago Convention”) on May 13, 1977. *Id.* 25; *see also* *Convention on International Civil Aviation Signed at Chicago on 7 December 1944* (last accessed Mar. 30, 2020), <https://www.icao.int/publications/Documents/chicago.pdf> (listing members to Convention).

<sup>29</sup> Gambia IDRL Report 24; *see also id.* (explaining also that individuals only need “a valid travel document and international health Certificate” and can stay up to 90 days without a visa). Gambia ratified this protocol on October 30, 1980. *Id.*; *see also* *Protocol Relating to Free Movement of Persons, Residence and Establishment*, Refworld (last accessed Mar. 30, 2020), <https://www.refworld.org/docid/492187502.html> (listing members to protocol).

<sup>30</sup> Gambia IDRL Report 82.

<sup>31</sup> Gambia IDRL Report 82.

<sup>32</sup> *The Gambia receives donations from China's Jack Ma to fight COVID-19*, Chinga.org (Mar. 29, 2020), [http://www.china.org.cn/world/2020-03/29/content\\_75873533.htm](http://www.china.org.cn/world/2020-03/29/content_75873533.htm).

<sup>33</sup> *Id.*

<sup>34</sup> Gambia IDRL Report 56.

<sup>35</sup> Gambia IDRL Report 57.

<sup>36</sup> Including Civil Aviation Act 2004 (as amended) and the Civil Aviation Regulations 2005.

<sup>37</sup> Gambia IDRL Report 78. For example, “the Act confers power to the Director General of The Gambia Civil Aviation Authority (GCAA) to make regulations, rules and orders for the better implementation of the Act.” *Id.*

regulation[s]” that can “facilitate the speedy entry into the country of medicinal products.”<sup>38</sup> In practice, Gambia’s civil society organizations “can be direct consignees of international relief” items through coordination with the NDMA,<sup>39</sup> and organizations seeking to bring relief items into Gambia may be able to request approval from the Permanent Secretary of the Ministry of Foreign Affairs.<sup>40</sup>

Under international law, Gambia is party to at least two treaties that may allow importation of medical aid and other relief supplies. Under the Convention on International Civil Aviation, “the Director General of the Civil Aviation shall facilitate the entry into, departure from and transit through the Gambian territory of aircraft engaged in relief flights, as well as ensuring that personnel and articles arriving on relief flights are cleared without delay.”<sup>41</sup> The Convention on Facilitation of International Maritime Traffic of 1965 provides measures related to facilitating disaster relief shipments.<sup>42</sup> Gambia has not ratified the Convention on Temporary Admission (the “Istanbul Convention”), which in “Annex B9 is concerned with goods imported for humanitarian purposes such as medical, surgical and laboratory equipment and relief consignments.”<sup>43</sup> Gambia has not ratified Specific Annex J.5 of the International Convention on the Simplification and Harmonization of Customs Procedures (“revised Kyoto Convention”), which “is dedicated to processing of relief consignments.”<sup>44</sup>

## **6. Is the RC (or humanitarian organizations) categorized as 'essential' or 'emergency' services, for the purposes of exemptions to restrictions on business operations and opening hours?**

Yes, but to a limited extent. As set forth in the answer to Question 1, the border closure with Senegal provides an exception for the “foodstuff” and “security personnel” categorizations, and as set forth in the answer to Question 2, the GRCS should “be ready to” afford emergency assistance.

Under Gambian law, the NDM Act does not “have specific provisions conferring legal [status to] national and international organizations when responding to an emergency.”<sup>45</sup> But, various laws “provide wide discretionary powers to a Director General of a Government Agency or a Minister to confer certain privileges,” and thus conceivably legal status, to national and international organizations responding to an emergency.<sup>46</sup> For example, Gambia’s Diplomatic Privileges (International Organizations) Act authorizes the President to confer privileges to members of the United Nations, IFRC, and other international organizations in the event of disaster and relief operations.<sup>47</sup>

## **7. What other measures are provided in the emergency decrees? (for governmental actors, for communities, for health workers, etc)?**

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<sup>38</sup> Gambia IDRL Report 64-65; see also Laws of The Gambia, Vol. 6, CAP 40:01, Medicines Act [Act No. 2 of 1984], Section 16(2), p10; International disaster response law (IDRL) in The Gambia, <https://www.ifrc.org/Global/Publications/IDRL/IDRL%20Report%20The%20Gambia.pdf>.

<sup>39</sup> Gambia IDRL Report 44.

<sup>40</sup> Gambia IDRL Report 78. “This is an administrative process which can be approved within twenty-four hours. For example, overflight and landing clearance was granted to a Turkish Military flight bringing Turkish Red Cross relief items to The Gambia. This was in the immediate aftermath of the 2010 major floods that resulted in a declaration of a State of National Disaster and the request for International relief assistance.” *Id.*

<sup>41</sup> Gambia IDRL Report 26. Gambia acceded to The Convention on International Civil Aviation (“Chicago Convention”) on May 13, 1977. *Id.* 25; see also *Convention on International Civil Aviation Signed at Chicago on 7 December 1944* (last accessed Mar. 30, 2020), <https://www.icao.int/publications/Documents/chicago.pdf> (listing members to Convention).

<sup>42</sup> Gambia IDRL Report 24; see also *Member States*, IMO (last accessed Mar. 30, 2020), <http://www.imo.org/en/About/Membership/Pages/MemberStates.aspx>.

<sup>43</sup> Gambia IDRL Report 26; see also *Summary of Treaty*, European Union Treaties Offices Database (last accessed Mar. 30, 2020), <http://ec.europa.eu/world/agreements/prepareCreateTreatiesWorkspace/treatiesGeneralData.do?step=0&redirect=true&treatyId=533#> (listing treat members).

<sup>44</sup> Gambia IDRL Report 25.

<sup>45</sup> Gambia IDRL Report 48.

<sup>46</sup> Gambia IDRL Report 48.

<sup>47</sup> Gambia IDRL Report 48.

Gambia has implemented several emergency measures, including:

1. Declaring a public emergency;<sup>48</sup>
2. Closing “non-essential outlets in all markets and enclosed shopping areas”;<sup>49</sup>
3. Closing “non-essential public places, such as bars, cafeterias, cinemas, video clubs, gymnasiums, museums, nightclubs, public swimming pools, event halls, casinos, gaming parlours and sporting venues”;<sup>50</sup>
4. Closing all public places of worship;<sup>51</sup>
5. Closing all schools, including universities, madrassas, daras, and majilis;<sup>52</sup>
6. Directing police to patrol cities and towns to ensure the closures;<sup>53</sup>
7. Ordering non-essential government employees to stay home for a period of 21 days, and ordering essential staff to alternate shifts;<sup>54</sup>
8. Issuing travel restrictions as discussed in the answer to Question 3;
9. Implemented surveillance at all strategic points of entry, including the Gambia International Airport, where routine temperature monitoring and travel history screening is enforced;<sup>55</sup>
10. Limiting the number of people attending any social events such as weddings, naming ceremonies and funerals a maximum of ten people;<sup>56</sup>
11. Limiting public transportation systems to transport half the amount they are normally permitted;<sup>57</sup>
12. Suspending parliament;<sup>58</sup>
13. Suspending human rights commission investigations;<sup>59</sup>
14. Providing regular updates via Facebook;<sup>60</sup>
15. Establishing an emergency fund for the Ministries of Economy and Health to fight COVID-19;<sup>61</sup>
16. Freezing the prices of essential commodities;<sup>62</sup>
17. Establishing an isolation center for suspected cases of COVID-19;<sup>63</sup>

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<sup>48</sup> COVID-19 information Gambia, U.S. Embassy in The Gambia (last accessed Mar. 30, 2020), <https://gm.usembassy.gov/u-s-citizen-services/covid-19-information/>.

<sup>49</sup> Gambia State House Facebook page, <https://www.facebook.com/PresidencyGambia/>; see also COVID-19 information Gambia, U.S. Embassy in The Gambia.

<sup>50</sup> Gambia State House Facebook page, <https://www.facebook.com/PresidencyGambia/>; see also COVID-19 information Gambia, U.S. Embassy in The Gambia.

<sup>51</sup> Gambia State House Facebook page, <https://www.facebook.com/PresidencyGambia/>; see also COVID-19 information Gambia, U.S. Embassy in The Gambia.

<sup>52</sup> COVID-19 information Gambia, U.S. Embassy in The Gambia.

<sup>53</sup> *Gambian police on raid to enforce state of emergency*, Journal du Cameroun (Mar. 29, 2020), <https://www.journalducameroun.com/en/gambian-police-on-raid-to-enforce-state-of-emergency/>.

<sup>54</sup> Omar Bah, *Gov't asks non-essential workers to stay home*, Standard (Mar. 25, 2020), <https://standard.gm/govt-asks-non-essential-workers-to-stay-home/>.

<sup>55</sup> WHO Africa Report.

<sup>56</sup> Gambia State House Facebook page, <https://www.facebook.com/PresidencyGambia/>; see also COVID-19 information Gambia, U.S. Embassy in The Gambia.

<sup>57</sup> Gambia State House Facebook page, <https://www.facebook.com/PresidencyGambia/>; see also COVID-19 information Gambia, U.S. Embassy in The Gambia.

<sup>58</sup> Mustapha K Darboe, *Gambia suspends parliament over coronavirus*, Anadolu Agency (Mar. 19, 2020), <https://www.aa.com.tr/en/africa/gambia-suspends-parliament-over-coronavirus/1771193>.

<sup>59</sup> Mustapha K Darboe, *Gambia suspends parliament over coronavirus*, Anadolu Agency (Mar. 19, 2020), <https://www.aa.com.tr/en/africa/gambia-suspends-parliament-over-coronavirus/1771193>.

<sup>60</sup> Gambia State House Facebook page, <https://www.facebook.com/PresidencyGambia/>; see also COVID-19 information Gambia, U.S. Embassy in The Gambia.

<sup>61</sup> President Barrow's Address to the Nation on COVID-9, Gambia State House Facebook page, <https://www.facebook.com/PresidencyGambia/>.

<sup>62</sup> Yankuba Jallow, *President Barrow Freezes Price Of Rice, Other Essential Commodities*, Foroyaa (Mar. 24, 2020), <https://foroyaa.gm/president-barrow-freezes-price-of-rice-other-essential-commodities/>.

<sup>63</sup> WHO Africa Report.

18. Implementing a national hotline to provide updates on COVID-19;<sup>64</sup>
19. Executing various epidemiologic responses to the virus, including testing, tracking, etc.<sup>65</sup>

**8. Have restrictions been adopted or put in place that ban the export of protective medical equipment?**

No. At the time of writing, it appears there are no restrictions banning the export of protective medical equipment in connection with the coronavirus or otherwise.

Under Gambian law, the Customs and Excise Act 2010 has “no restrictions on the transit of relief goods or relief personnel to other countries or on the sending of international relief goods and personnel from The Gambia.”<sup>66</sup>

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<sup>64</sup> Gambia State House Facebook page, <https://www.facebook.com/PresidencyGambia/>; see also COVID-19 information Gambia, U.S. Embassy in The Gambia.

<sup>65</sup> MoH, *COVID-19* (last accessed Mar. 29, 2020), [www.moh.gov.gm/covid-19-report](http://www.moh.gov.gm/covid-19-report).

<sup>66</sup> Gambia IDRL report 90.