

**EXECUTIVE
BOARD
MEETING**

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March 5, 2020

To: Members of the Executive Board

From: The Secretary

Subject: **The Gambia—First Review of the Staff-Monitored Program and Request for a 39-Month Arrangement Under the Extended Credit Facility**

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*The authorities have indicated that they consent to the Fund's publication of this paper.



THE GAMBIA

March 4, 2020

FIRST REVIEW OF THE STAFF-MONITORED PROGRAM AND REQUEST FOR A 39-MONTH ARRANGEMENT UNDER THE EXTENDED CREDIT FACILITY

EXECUTIVE SUMMARY

Context. The Gambia remains a fragile state, grappling with a large public debt burden and the legacy of mismanagement left by the previous regime. Considerable progress has been achieved under the transitional justice agenda and broader initiatives aimed at improving governance. Building on successful macroeconomic stabilization with financial support from the IMF, the World Bank, and other international partners, the authorities established a satisfactory performance track record through the Staff-Monitored Program (SMP) covering 2019, approved by the IMF Management in April 2019.

Extended Credit Facility (ECF) Arrangement. The Gambian authorities are requesting a thirty-nine-month financial arrangement under the ECF in an amount of SDR 35 million (56.3 percent of quota), to support their medium-term economic reform program anchored on their 2018–21 National Development Plan (NDP).

Program objectives. The proposed ECF-supported program aims at sustaining high and inclusive growth and poverty reduction in the context of the NDP. In the short term, the program will focus on strengthening public financial management and domestic revenue mobilization, while mitigating fiscal risks stemming from state-owned enterprises. These efforts will help entrench macro-stability and reduce debt vulnerabilities, in part thanks to the breathing space gained through voluntary debt service deferrals granted by most of The Gambia's bilateral and plurilateral creditors. The key medium-term goals include: (i) expanding the fiscal space for infrastructure projects and social programs; (ii) improving the business environment, by reducing perceived corruption and strengthening digital infrastructure; and (iii) expanding financial inclusion, mainstreaming gender equality, and making progress on addressing the impact of climate change.

Risks to the program. Risks emanate from building political tensions in the run-up to presidential elections next year, which could also give rise to expenditure overruns, and, more broadly, from weak management of state-owned enterprises (SOEs), vulnerability to corruption, and political capture of the public investment program. The authorities' commitment to macroeconomic stability and sound fiscal management, as demonstrated in the 2019 SMP, would help contain these risks.

Staff supports the authorities' request for IMF support. The implementation of the program would strengthen The Gambia's economic prospects and help catalyze additional donor financing, particularly in the form of grants for budget support.

Approved By
Annalisa Fedelino
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Goodman (SPR)

The missions to Banjul during December 9–17, 2019 and February 3–11, 2020 comprised Messrs. Wieczorek (head), Kumah, Norat (all AFR), Daal (FAD, first mission), and Khan (SPR), and Ms. Devine (AFR, second mission) with support from Messrs. Barry (resident representative) and Mendy (local economist). Mr. Jappah (OEDAE) participated in the policy discussions. The team met with President Barrow, Finance Minister Njie, Central Bank Governor Jammeh, other public officials, private sector operators, and members of the diplomatic and donor community. Ms. Quartey and Mr. Treilly assisted in the preparation of this report.

CONTENTS

Acronyms	4
CONTEXT	5
RECENT DEVELOPMENTS, OUTLOOK AND RISKS	8
POLICIES SUPPORTING THE PROGRAM	12
A. Expanding the Fiscal Space	12
B. Debt Sustainability	14
C. Monetary Policy and Financial Sector Issues	16
D. Governance and Other Structural Reforms	17
DATA ISSUES AND CAPACITY DEVELOPMENT	18
PROGRAM MODALITIES, FINANCING ASSURANCES, AND RISKS	18
STAFF APPRAISAL	20
FIGURES	
1. Recent Economic Developments, 2013–19	24
2. Fiscal and Financial Sector Developments, 2013–19	25
3. Medium-Term Economic Outlook, 2018–25	26
TABLES	
1. Selected Economic Indicators, 2018–25	27
2. Statement of Central Government Operations, 2018–25 (Millions of local currency)	28
3. Statement of Central Government Operations, 2018–25 (Percent of GDP)	29

4. Statement of Central Government Operations, 2019–20 (Cumulative, millions of local currency) _____	30
5. Monetary Accounts, 2018–21 (Millions of local currency) _____	31
6. Monetary Accounts, 2018–21 (Percent change) _____	32
7. Monetary Accounts, 2019–20 (Millions of local currency) _____	33
8. Balance of Payments, 2018–25 (Millions of U. S. dollars) _____	34
9. Balance of Payments, 2018–25 (Percent of GDP) _____	35
10. External Financing Needs, 2020–25 _____	36
11. Financial Soundness Indicators for the Banking Sector, 2015–19 _____	37
12. Indicators of Capacity to Repay the Fund, 2019–25 _____	38
13. Proposed Disbursements Under the ECF Arrangement, 2020–23 _____	39

ANNEXES

I. Strengthening Governance and Tackling Corruption and Trafficking in Persons _____	40
II. Lending into Arrears to Official Bilateral Creditors _____	45
III. World Bank Sectoral SOE Reform Progress _____	46
IV. Risk Assessment Matrix _____	47
V. Capacity Development Strategy for FY2021 _____	48

APPENDICES

I. Letter of Intent _____	56
Attachment I. Memorandum of Economic and Financial Policies _____	58
Attachment II. Technical Memorandum of Understanding _____	86

Acronyms

AfDB	African Development Bank
BoP	Balance of Payments
BRP	Banjul Rehabilitation Project
CBG	Central Bank of The Gambia
CPI	Consumer Price Index
DSA	Debt Sustainability Analysis
ECF	Extended Credit Facility
EU	European Union
FSSR	Financial Sector Stability Review
FX	Foreign Exchange
GBoS	The Gambia Bureau of Statistics
GDP	Gross Domestic Product
GIABA	The Inter-Governmental Action Group against Money Laundering in West Africa
GMD	The Gambian dalasi
GNPC	The Gambia National Petroleum Corporation
GPPA	The Gambia Public Procurement Authority
GRA	The Gambia Revenue Authority
IFI	International Financial Institution
IFMIS	Integrated Financial Management Information System
IsDB	Islamic Development Bank
IT	Indicative Target
ITFC	Islamic Trade Finance Corporation
LOI	Letter of Intent
MDAs	Ministries, Departments, and Agencies
MEFP	Memorandum of Economic and Financial Policies
MoFEA	Ministry of Finance and Economic Affairs
MOU	Memorandum of Understanding
MTDS	Medium-Term Debt Strategy
MTEF	Medium-Term Fiscal Framework
NAWEC	National Water and Electricity Corporation
NDB	Net Domestic Borrowing
NDP	National Development Plan
NFSPMC	National Food Security, Processing, and Marketing Corporation
NPLs	Non-Performing Loans
OIC	Organization of Islamic Cooperation
PACD	Program for Accelerated Community Development
PC	Performance Criterion
PFM	Public Financial Management
PIMA	Public Investment Management Assessment
RAM	Risk Assessment Matrix
SB	Structural Benchmark
SDF	Standing Deposit Facility
SMP	Staff-Monitored Program
SOEs	State-Owned Enterprises
TA	Technical Assistance
TADAT	Tax Administration Diagnostic Tool
TMU	Technical Memorandum of Understanding
TRRC	Truth, Reconciliation and Reparations Commission
TSA	Treasury Single Account

CONTEXT

1. The Gambia's newly found democracy is weathering challenges. Until recently, President Barrow's tenure was characterized by a relative calm, although punctuated by several government reshuffles, eventually leading to a departure of his coalition partners. Beginning in late 2019, opposition groups started to launch political protests calling on the President to step down at the third anniversary of his induction in January 2020, reportedly as agreed with former coalition partners.¹ Notwithstanding these challenges, the government has advanced transitional justice initiatives to strengthen the rule of law, uproot high-level corruption, and bring to light human rights violations committed during former President Jammeh's rule (see Annex I).

2. The Gambia is overcoming the dire economic situation inherited from the previous regime. The political turmoil preceding the democratic transition had reduced tourism and put the government finances in a precarious position. Official reserves waned and public debt surged. In mid-2017, The Gambian authorities requested support under the IMF's shocks window of the Rapid Credit Facility (RCF) and committed to a one-year SMP (later extended by six months) to build a track record toward an ECF-supported program. The macroeconomic situation stabilized but mixed performance under that SMP and unsustainable public debt delayed the transition to an ECF-supported program. The new SMP, put in place in 2019, strengthened policy implementation and provided the framework for The Gambia to exit from external debt distress, building on the commitments of debt restructuring expressed by most of its creditors at the roundtable discussions held on the sidelines of the 2019 Spring Meetings.

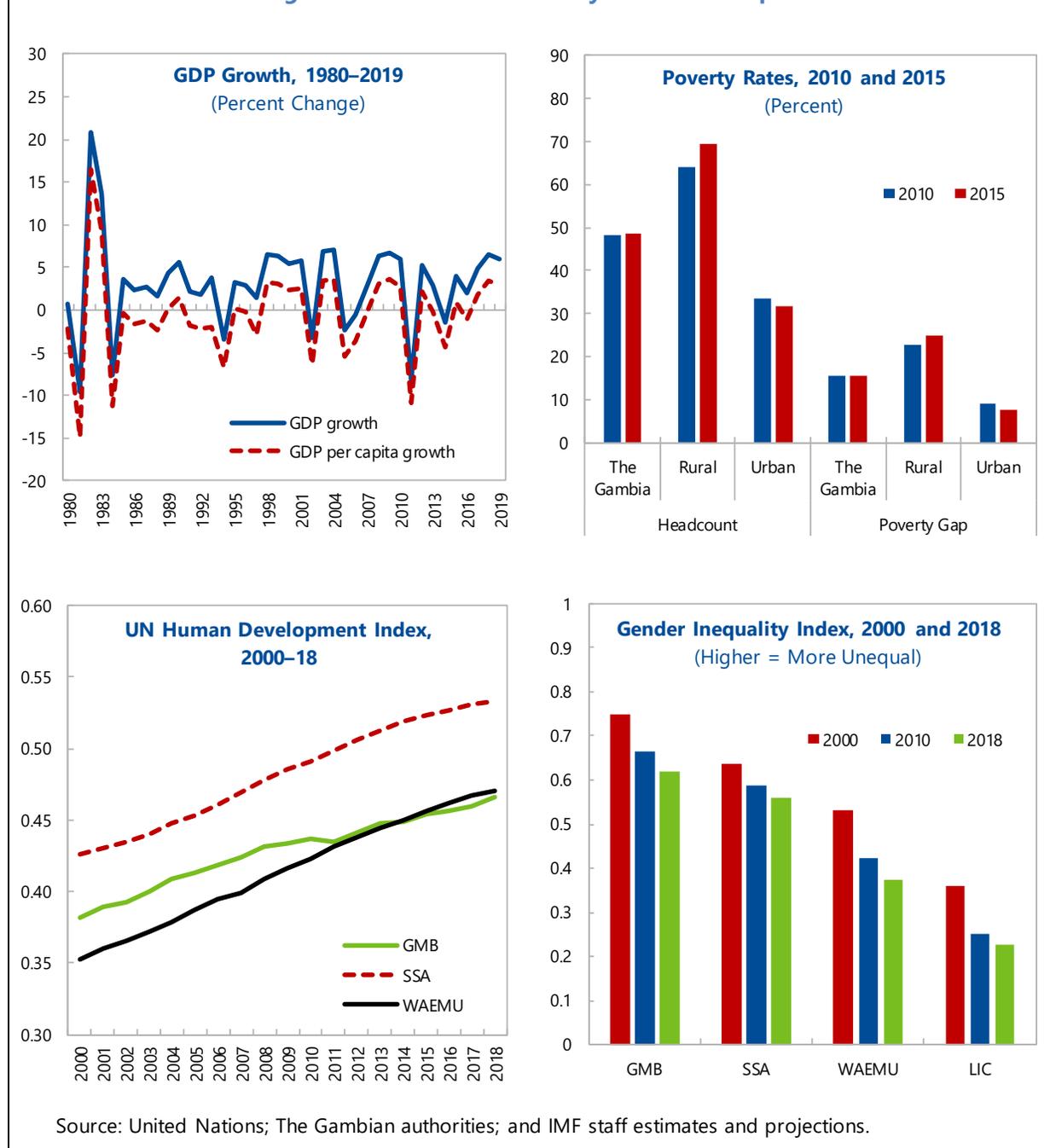
3. Nonetheless, The Gambia's socioeconomic situation remains fragile. According to the Integrated Household Survey (IHS, 2015/16), in 2015, the poverty rate in The Gambia was 48.6 percent (with rural poverty at 69.5 percent) placing it among the poorest and most fragile countries in Sub-Saharan Africa (Text Figure 1). In the World Bank's view, this has hardly changed in the last five years,² despite achievements documented in the 2019 annual performance review (APR) of the 2018–21 National Development Plan (NDP) showing satisfactory progress on nearly half of the indicators, but also notable weaknesses in agriculture and youth empowerment. The planned extension of the NDP will aim to align it better with the Sustainable Development Goals (SDGs).

4. The Gambia has secured credible assurances of debt relief needed for transitioning to the ECF-supported program. The total debt service deferred between 2020 and 2024 amounts to US\$158 million (equivalent to 9 percent of 2019 GDP), which contributes to making the proposed ECF-supported program fully financed and The Gambia's public debt sustainable on a forward-looking basis. Binding debt restructuring offers have been made by most participating creditors,

¹ President Barrow took post in early 2017, following disputed elections that led to the departure from The Gambia of the former President Jammeh, who took power through a military coup in 1994 and was elected for four consecutive terms, starting in 1996. The presidential terms last 5 years.

² The World Bank, The Gambia Social Safety Net Project, Project Appraisal Document, April 26, 2019.

Text Figure 1. The Gambia: Poverty and Social Deprivation



while in two cases these offers are still being finalized. A debt restructuring proposal from OPEC Fund for International Development (OFID) is currently undergoing a final review by its management and is expected to be finalized in March 2020. ECOWAS Bank for International Development (EBID) is finalizing its proposal for debt deferral in consultation with India, a source of funds on-lent by EBID. Reaching agreements will likely require more time in three cases, involving official creditors (Libya, Venezuela, and Taiwan Province of China). The authorities are disputing the claims to Libya due to a disagreement over the amount owed and they will continue to run arrears to Venezuela

due to international financial sanctions (Annex II).³ In the case of Taiwan Province of China, discussions, which got delayed pending the opinion from the Ministry of Justice, are expected to resume at a later stage and debt service obligations are being met in the meanwhile. The authorities are not expected to pursue agreement with the private claimant, M.A. Kharafi & Sons, recognizing that this debt is originating from an earlier rescheduling of payments due to the domestic subsidiary of this international construction company (Text Table 1). The non-participation of these creditors does not qualitatively affect the results of the debt sustainability analysis (DSA, see ¶19).

	Outstanding	Debt Service Reduction			Principal Deferral	Maturity Extension	Interest Deferral	Comments
	Debt end-2019	2020	2021	2020–24				
<i>Confirmed offers</i>								
The Islamic Development Bank (IsDB)	147.8	8.2	8.7	42.5	5 years	x	x	Principal deferral on all equity-funded loans representing 45 percent of debt service due in 2020–24. Maturities of certain market-funded loans extended by up to two years. The option of accessing a grant window is being explored.
Arab Bank for Economic Development (BADEA)	55.9	2.3	2.1	9.8	5 years	5 years	x	
Saudi Fund for Development (SFD)	47.9	0.0	0.0	7.2	7 years	4 years	x	For SFD, "Debt Service Reduction" reflects only the deferral of payments due in 2022–24. This is in addition to US\$5.6 million for debt service due in 2018–21 that was deferred in January 2018 and already reflected in the baseline.
Kuwait Fund for Arab Economic Development (KFAED)	48.9	1.0	3.1	17.7	5 to 7 years	x	x	
Export-Import Bank of India (EXIM Bank)	41.7	2.5	4.8	25.2	5 years	5 years	✓	Interest deferral funded by a new interest-bearing loan.
Abu Dhabi Fund for Arab Economic Development (ADFD)	14.4	1.3	1.3	6.4	5 years	5 years	x	
<i>Pending offers</i>								
OPEC Fund for International Development (OFID)	45.2	5.9	6.4	29.2	-	-	-	Governing body decision expected in March 2020. Principal and interest expected to be deferred until 2025.
ECOWAS Bank for International Development (EBID)	22.8	1.9	2.1	10.5	-	-	-	The proposal to defer principal and interest until 2025 is being finalized in consultation with India, a source of funds on-lent by EBID.
<i>Technical issues/disputed claims</i>								
Libya ¹	4.0	0.7	0.7	2.5	-	-	-	Disputed claims, not expected to be serviced.
Venezuela ¹	15.1	1.4	1.4	6.9	-	-	-	Not serviced (international sanctions).
Taiwan Province of China ²	14.3	0.0	0.0	0.0	-	-	-	Discussions continue.
<i>Memorandum item (private claims)</i>								
M. A. Kharafi and Sons ²	36.9	0.0	0.0	0.0	-	-	-	The authorities intend to service this debt, which originates from an earlier rescheduling of claims.
Total	494.9	25.2	30.6	157.9				
Source: IMF staff estimates.								
¹ Payments in arrears are recorded as debt service reduction.								
² Authorities are current on payments.								

³ In the context of this ECF request, the IMF's lending into official arrears (LIOA) policy applies to the case of Venezuela. Since, at present, the IMF does not recognize any government of Venezuela, the application of the LIOA policy leans on the fulfillment of the following criteria: (i) there is a need for prompt financial support from the Fund and the member is pursuing appropriate policies; (ii) the debtor is acting in good faith to resolve the arrears; and (iii) the decision to lend into unresolved arrears owed to an official bilateral creditor will not have an undue effect on the Fund's ability to mobilize future financing packages. Staff ascertained that in this case all three criteria are met.

5. Progress on SOE reforms has also helped reduce debt vulnerabilities (Annexes I and III, MEFP1112 and 14, and 31–33). Improved monitoring of financial performance of SOEs and better understanding of their deficiencies helped contain fiscal risks, which had flared up in 2018, and reduced the government’s exposure to potential external default by preventing the recurrence of arrears to the International Islamic Trade Finance Corporation (ITFC). All SOEs have now undergone forensic audits whose recommendations are forming the basis for individual action plans and broader strategic reforms. These will be reflected in the wholesale revision to the SOE law, which is proceeding in step with the ongoing constitutional revisions to eliminate executive interference in SOEs and strengthen their governance.

RECENT DEVELOPMENTS, OUTLOOK AND RISKS

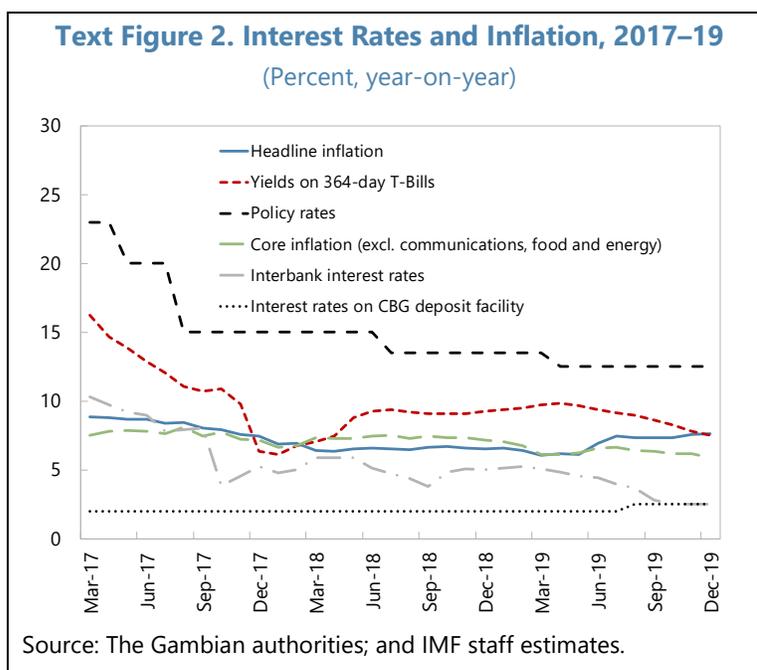
6. The Gambian economy continues to perform well (Figure 1). GDP growth in 2019 reached 6 percent, despite rainfall deficit with long dry spells reducing agricultural production by 10 percent and the financial collapse of Thomas Cook, UK (TCUK) at the start of the 2019/20 tourism season requiring a rapid repositioning of the tourism sector to achieve targeted performance. Growth factors included a more reliable power supply, lower interest rates, and continued strong activity in tourism and other services, complementing the impetus from the public investment program.

7. Fiscal performance improved in 2019, reflecting strong revenue collection and better expenditure control (Figure 2 and Tables 2–4). The authorities’ efforts were supported by intensive technical assistance (TA), with the posting of resident advisors at the Gambia Revenue Authority (GRA) and the Ministry of Finance and Economic Affairs (MoFEA), which helped boost revenue collection and improve public financial management:

- Tax collections increased by 0.9 percent of GDP, mostly due to administrative improvements, drawing on the assessment conducted in 2018 with the use of the IMF’s Tax Administration Diagnostic Assessment Tool (TADAT), while the receipts of nearly 0.9 percent of GDP in signature bonuses from the prospecting petroleum companies (BP and FAR Gambia Limited) helped boost nontax revenue.
- Expenditure control and treasury cash management strengthened and, unlike in 2018, major expenditure overruns and accumulation of arrears were avoided.
- As a result, the overall fiscal deficit declined from 6.2 percent of GDP in 2018 to 2.6 percent of GDP in 2019. Over the same period, the domestic primary surplus increased from 0.6 to 1.8 percent of GDP, and net domestic borrowing declined from 3.3 to 1.2 percent of GDP.

8. Inflation pressure and business sentiments remained favorable, enabling monetary easing and contributing to the build-up of official reserves (Text Figure 2). Domestic food price increases (associated with Ramadan and delayed erratic rains) and a one-time hike in postal charges pushed headline inflation from an average of 6.5 percent in 2018 to 7.1 percent in 2019. The dalasi remained stable during the year, depreciating against the U.S. dollar by 3.2 percent (y/y) in nominal

terms at year's end. Core inflation (excluding food, energy, and communication) declined to 5.6 percent. Citing well-anchored inflation expectations and favorable business sentiments, the CBG reduced the policy rate from 13.5 percent to 12.5 percent effective March 2019 but kept it unchanged thereafter as reported headline inflation picked up. In order to narrow the interest corridor and improve the transmission of interest signals, the CBG raised the deposit facility rate in August 2019 from 2 percent to 2.5 percent. Drawing on the increased FX inflows from private sources, the CBG made frequent FX purchases, which helped ensure adequate liquidity in response to



growing demand for the dalasi and seasonal pressures. This also helped the banking system to meet the demand for credit expansion, facilitated the build-up of official reserves, and prevented undesirable dalasi appreciation, given the need to strengthen The Gambia's competitiveness in the light of the analysis in the 2017 Article IV report.

9. Financial intermediation picked up further, with banks increasingly looking for retail business as their FX buffers increased and T-bill rates softened. Credit to the private sector expanded by 35.8 percent (y/y) in 2019, despite still elevated average lending rates of around 21 percent, which translated into a 1.5-percentage-points increase (relative to 2018) in the credit-to-GDP ratio to 8.7 percent. At the same time, bank capitalization remained high and profitability improved. However, the share of non-performing loans (NPLs) increased from 3.3 percent at end-2018 to 4.5 percent at end-2019, due to a localized deterioration in asset quality (Figure 2 and Table 11). Going forward, the CBG is expecting the banks to exercise greater prudence with regard to demand for credit and maintain strong FX buffers to meet import-related demand for foreign exchange, and other current account transactions, including the remittance of profits.

10. The external position improved, helping further build-up of external buffers (Figure 2 and Tables 1 and 8–9).

- An increase in tourism, official transfers, and remittance inflows improved the current account balance, with the deficit of 8.5 percent of GDP more than fully financed by capital and financial inflows (including capital transfers by the diaspora investing in real estate).
- With the overall balance-of-payments (BoP) surplus exceeding 4 percent of GDP, gross official reserves reached US\$225 million (3.4 months of prospective imports) at end-2019.

11. Performance under the 2019 SMP was strong overall, creating a positive track record needed to support the request for an ECF-supported program (MEFP Tables 1 and 3). The main challenge to the implementation of the SMP related to the authorities' decision to launch the Banjul Rehabilitation Project (BRP). This delayed the completion of the first review under the SMP. In the end, the issues surrounding the BRP were satisfactorily resolved (see ¶13). Program implementation was strong in most other areas, in particular with regard to domestic revenue mobilization, and all quantitative targets were met at all test dates, except the floor for poverty-reducing spending at end-September 2019 and the continuous zero ceiling on external arrears accumulation, which was breached through mid-November 2019, and all but two structural benchmarks (SBs) were met:

- The end-December 2019 ceiling on the NDB as adjusted for a minor shortfall in budget support was met with a margin of 1.0 percent of GDP, which was helped by the ringfencing of signature bonuses received from prospecting oil companies.
- The end-December 2019 ceiling on the CBG's net domestic assets and the end-December 2019 floor for net usable international reserves (the latter also adjusted for budget support shortfalls) were met with margins of 1.5 billion dalasi and US\$54 million, respectively.
- The zero ceiling on new external payment arrears (a continuous target) was breached at end-April and at all subsequent quarterly test dates, as the accumulating arrears to Paris Club creditors were cleared in November 2019. The zero ceilings on (i) new non-concessional external debt contracted or guaranteed; (ii) outstanding stock of external public debt with original maturity of one year or less; and (iii) central bank credit to the central government on non-market terms were all met at all test dates through the year.
- Two SBs were missed but the overdue actions were subsequently completed: (i) the audit of domestic arrears and preparation of a strategy for their clearance (both due at end-June) were completed in stages until December 2019; and (ii) the publication of audited 2018 financial statements of the CBG (due at end-September) took place in November 2019.

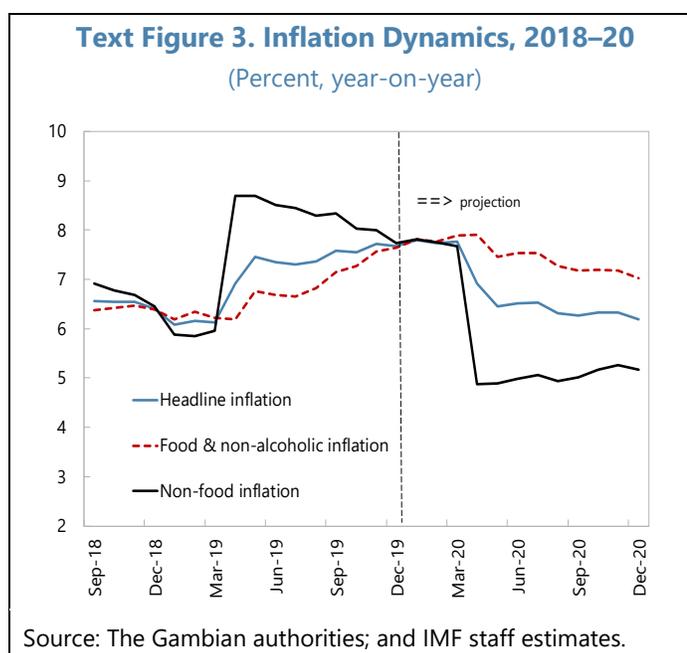
Management has approved The Gambia's completion of the first review under the SMP, albeit with a delay, and staff assesses performance under the remainder of the SMP to be also satisfactory.⁴ On the basis of this overall strong track record, staff supports the authorities' request for an ECF arrangement.

12. Strengthened oversight of SOEs was critical to this performance. Most notably, in 2019 the government signed a memorandum with the utility company NAWEC (the largest SOE) to resolve the nexus of arrears among NAWEC, other SOEs, the government, and the GRA. Similar steps have also been taken to improve the performance of other SOEs—all resulting in a reduction and more transparent definition of subsidy needs in the 2020 budget.

⁴ The second review under the SMP was not completed due to staff's and the authorities' focus on discussions for a subsequent financing arrangement.

13. The SMP also helped lay the basis for strengthening public investment process based on the Public Investment Management Assessment (PIMA) conducted in June 2019. Concrete measures in this area helped address challenges that surfaced in the context of the BRP, given its single sourcing and potential contracting of non-concessional external debt (equivalent of 2 percent of GDP). In the event, (i) the financing arrangement was revisited to ensure that payments would be made in dalasi through annual budgets as the project is being implemented; (ii) to ensure value-for-money, the implementation of the project is being monitored by an independent consulting company; and (iii) terms of reference for project appraisal process have been revised in line with PIMA recommendations. As a prior action for this ECF request, a revised draft of The Gambia Public Procurement Authority (GPPA) Act has been submitted to the Cabinet and further steps to improve project selection are to be taken in 2020 (see ¶118).

14. The medium-term economic outlook remains favorable (Text Table 2). In the medium term, growth is expected to average 5.5 percent in 2020–25, on the back of strong growth in private sector activity (construction and tourism) supported by improvements in public infrastructure and services. As the impact of the change in postal charges wanes, inflation is expected to decline to around 6.5 percent by mid-2020 and then converge gradually to the CBG’s target of 5 percent (Text Figure 3).⁵ With strong import growth to support expansion in tourism and private investment, the current account deficit is expected to widen; however, the capital and financial account would remain strong, reflecting disbursements of funds for public investment and private capital transfers. Gross official reserves are projected to increase to the equivalent of 4½ months of prospective imports by 2022.



- **Downside risks** stem from climatic shocks, deterioration in the political environment, and possible weakening of fiscal discipline, notably, in the run-up to the 2021 elections. The macroeconomic outlook is also subject to risks stemming from weak administrative capacity and vulnerability to corruption, which could undermine the implementation of the program (see ¶134 and Annex IV) and curtail The Gambia’s access to financial support from development partners.

⁵ Starting in 2020, reported inflation will also be affected by the recent revisions to CPI coverage based on the 2015/16 Integrated Household Survey and methodological revisions (including better treatment of missing values and use of geometric means, an international best practice).

- **Upside risks** stem from infrastructure projects ahead of the Organization of Islamic Cooperation (OIC) summit, to be held in The Gambia in 2022, and confirmed discovery of economically viable oil reserves.

Text Table 2. The Gambia: Economic Performance and Medium-Term Projections, 2018–25

	2018	2019	2020	2021	2022	2023	2024	2025
	Act.	Prel.	Projections					
(annual percent change, unless otherwise indicated)								
Growth and Inflation								
Real GDP growth	6.5	6.0	6.3	5.8	5.5	5.2	5.2	5.0
Headline inflation (average)	6.5	7.1	6.7	6.0	5.5	5.1	5.0	5.0
(percent of GDP, unless otherwise indicated)								
Fiscal Sector								
Total revenue (incl. grants)	15.4	22.2	22.9	22.5	22.0	21.6	21.3	21.3
Total expenditure	21.6	24.8	24.6	24.2	23.4	22.7	22.0	21.7
<i>of which:</i> Investment expenditure	7.6	9.8	10.3	10.2	9.5	8.8	8.1	8.2
Overall fiscal balance	-6.3	-2.6	-1.7	-1.8	-1.4	-1.1	-0.7	-0.4
Primary balance	-3.0	0.6	1.0	0.8	0.8	1.1	1.3	1.5
Net domestic borrowing	3.3	1.2	0.5	0.0	0.0	0.0	0.0	0.0
External Sector								
Current account balance	-9.7	-5.3	-8.7	-9.9	-9.6	-9.0	-9.1	-8.8
Public debt	86.6	81.4	75.8	70.8	66.6	62.7	58.5	54.4
Gross official reserves (months of imports)	2.7	3.4	3.7	4.1	4.3	4.4	4.4	4.6

Sources: The Gambian authorities; and IMF staff estimates and projections.

POLICIES SUPPORTING THE PROGRAM

15. The Gambian authorities have requested a thirty-nine-month ECF arrangement to lay a solid foundation for sustainable and inclusive growth. They recognize that consolidating gains attained under the 2019 SMP in macroeconomic stability and advancing the structural agenda would enhance policy credibility and economic resilience. To this end, they have committed to: (i) expand the fiscal space for productive investment and priority social spending; (ii) maintain debt sustainability through adherence to their medium-term debt strategy (MTDS); (iii) advance monetary management and healthy financial inclusion; (iv) strengthen governance and financial management of SOEs for a more efficient and reliable public service delivery; and (v) improve the business environment, including by strengthening governance and combating corruption. They underscore the need to leverage TA to enhance institutional capacity and improve the quality and timeliness of economic statistics to facilitate program monitoring (Annex V).

A. Expanding the Fiscal Space

16. The fiscal position will be strengthened further to support debt sustainability while protecting outlays on infrastructure and social needs (MEFP ¶21). The medium-term fiscal

program features a gradual increase in the domestic primary surplus to 2.5 percent of GDP by end-2025. This, together with the temporary reduction in external debt service payments over the period would support a reduction in the public debt-to-GDP ratio from over 81 percent in 2019 to below 55 percent in 2025. The TADAT roadmap guides the increases in domestic revenue collection, while tightened PFM, rationalization of subvented agencies, and the SOE reforms would ensure greater expenditure control and a progressive reallocation of resources from subsidies to spending on social programs and maintenance of infrastructure.

17. The 2020 budget lays an adequate foundation for the program (MEFP ¶23).

- On the revenue side, measures yielding about 0.3 percent of GDP include: (i) increases in tobacco-related taxes and excises; (ii) an increase in customs processing fees by 0.5 percent to 1.5 percent and their extension to hitherto exempted imports. In addition, an increase in the VAT threshold should boost tax revenues over the medium term. Potential tax revenue gains not captured in the 2020 budget could come from the tightening of the tax exemption policy and a more rigorous monitoring of its use (the estimated amount of revenues foregone in 2019 on account of tax and duty exemptions exceeded 3 percent of GDP).
- On the expenditure side, current expenses are projected to decline as a percentage of GDP by 0.7 points on account of lower interest payments (by 0.5 percent of GDP) and a containment of growth in other categories of expenditure. To this effect, the authorities will keep outlays on compensation of employees constant in GDP terms. The reduction in spending on goods and services largely reflects a reclassification of some of the spending previously budgeted under this category as transfers and public investment.
- The government will use part of the resulting fiscal space to safeguard social and other priority spending under the program, including (i) three social initiatives (a pension fund and national health insurance scheme, a program for accelerated community development, and a social safety net project); (ii) a 25-percent increase in subsidies and transfers to the education and health sectors to finance recruitment of new teachers and medical officers; and (iii) the implementation of the BRP.
- The program foresees a progressive reduction of arrears to SOEs, a full clearance of validated arrears to domestic suppliers envisaged in the budget (0.3 percent of GDP), and at least a partial clearance of arrears to suppliers identified in the 2019 audit (less than 0.3 percent of GDP).
- The main difference between the program and the budget pertains to the foreign-financed capital spending, which in staff's view appear overstated in the 2020 budget, based on the historic pattern and staff's assessment of implementation capacity.

18. In the fiscal area, program objectives will be supported by the implementation of the following structural measures (MEFP ¶¶39–45 and MEFP Table 4):

- **Revenue administration.** Key measures include: (i) the completion of the tax registry clean-up at offices in the greater Banjul area that account for over 90 percent of tax revenue (**SB for June 2020**); (ii) preparation of a tax exemptions policy for Cabinet approval (**SB for September 2020**)

and better monitoring of tax exemptions; (iii) training the GRA staff in tax auditing and data matching; and (iv) building competencies in petroleum taxation.

- **Public financial management.** Key measures include:
 - i. Submitting to Cabinet a revised GPPA Act (**completed as a prior action**) that makes the GPPA the sole institution responsible for public procurement, eliminates the use of executive waivers, and drastically limits the recourse to single sourcing. Independently, to foster greater fiscal transparency and budget control, the authorities are also revisiting the financing modalities for the GPPA with a view to strengthen its capacity.
 - ii. Developing a monthly cashflow plan for the whole year, consistent with the 2020 budget (**SB for March 2020**), to strengthen Treasury management, and updating the cashflow plan on a monthly basis under the guidance of the cash management committee.
 - iii. Adopting project selection criteria recommended by PIMA for The Gambia Strategic Review Board (**SB for June 2020**). As part of the benchmark, MoFEA will test the criteria proposed in the PIMA report on a representative sample of existing projects, to ensure an appropriate application of these criteria in preparing the 2021 budget.
 - iv. Submitting an assessment report on subvented agencies to Cabinet with proposals for their rationalization (**SB for September 2020**). Furthermore, the authorities will continue to modernize the budget process and foster transparency, including by publishing an annual statement of Ministries, Departments, and Agencies' (MDAs') compliance with internal audit recommendations (**SB for December 2020**). They will also conduct a public expenditure and finance assessment (PEFA) with support from development partners, which will inform further PFM reform.

B. Debt Sustainability

19. The Gambia's debt risk profile has improved although with still elevated vulnerability to debt distress, calling for tight external debt conditionality (MEFP ¶127 and MEFP Table 2). The DSA conducted in the context of this ECF request (Supplement 1) concludes that The Gambia's debt distress risk rating has improved relative to the DSA conducted in April 2019 from being "in debt distress" to being at "a high risk of debt distress." Following the debt service deferrals, the country's debt service-to-exports ratio remains below its indicative threshold both in the near and the medium term. The external debt service-to-revenue ratio breaches its indicative threshold in 2020 but drops below it thereafter. Further, through a combined effect of debt restructuring, reduced reliance on non-concessional borrowing, fiscal consolidation, greater availability of grants for budget support, and an on-going reform of SOEs, the PV of total public debt drops below its threshold in 2023. To ensure that their debt contracting policy is consistent with this medium-term debt profile, the authorities have committed: (i) not to contract or guarantee non-concessional external debt (**continuous PC**); (ii) to adhere to a borrowing plan that limits the amount of external concessional debt (i.e., debt with a minimum grant element of 35 percent) contracted or guaranteed to US\$190 million over 2020–23 (Text Table 3); and (iii) to limit the amount of such debt contracted

or guaranteed in 2020 to US\$60 million. This limit will constitute a **continuous PC**, which the authorities committed to monitoring in consultation with Fund staff.

Text Table 3. The Gambia: Borrowing Plan, 2020–23

(Millions of U.S. dollars)

External public debt contracted or guaranteed							
	2020	2021	2022	2023	2020–23		
Source of debt financing							
Concessional debt	60	40	40	50	190		
Multilateral debt	40	20	20	30	110		
Bilateral debt	20	20	20	20	80		
Nonconcessional debt	0	0	0	0	0		
Use of debt financing							
Infrastructure	60	40	40	50	190		
Budget financing	0	0	0	0	0		
Assumed disbursement profile							
	2020	2021	2022	2023	2024	2025	2026
Source of debt financing							
Concessional debt	15	20	25	25	25	30	50
Multilateral debt	10	15	15	10	10	20	20
Bilateral debt	5	5	10	15	15	10	30
Nonconcessional debt	0	0	0	0	0	0	0

Sources: The Gambian authorities; and IMF staff estimates and projections.

20. To safeguard debt sustainability, MoFEA is updating its MTDS (MEFP ¶¶28–30 and MEFP Table 4). The update will reflect the impact of debt relief commitments and articulate a detailed plan for the issuance of domestic instruments, envisaging the use of instruments with longer-term maturities to reduce rollover risks (**SB for September 2020**). The authorities are also strengthening the monitoring and controls around SOEs' use of ITFC trade credit facilities to prevent the recurrence of arrears on these claims, which are included under the **continuous PC on non-accumulation of new external arrears**. They will continue to improve debt monitoring and reporting, including through (i) the preparation of quarterly reports on external debt commitments, agreements, and disbursements; and (ii) annual reconciliations of debt stocks with their respective external creditors. The new Meridian debt recording system from the Commonwealth Secretariat will enable the authorities to monitor the public debt more accurately and ensure debt service payments on a timely basis.

C. Monetary Policy and Financial Sector Issues

21. The CBG is bolstering the effectiveness of its policy instruments (MEFP ¶¶34–35 and MEFP Table 2).

- **Improving the monetary policy framework.** The CBG will continue to rely on the interest-rate channel to achieve its inflation targets. To this effect, it will gradually narrow the interest corridor, including by raising further the SDF rate, which effectively acts as a policy rate to ensure that it provides an anchor for the interbank money market. For its liquidity forecasting and monitoring, the CBG is utilizing templates developed with TA from AFRITAC West2 and has tightened collaboration with the Gambia Bureau of Statistics (GBoS), GRA and MoFEA on inputs needed for liquidity forecasting. It is expected that the improved tracking of the CPI will help better calibrate monetary policy.
- **Continued commitment to a flexible exchange rate regime** (MEFP ¶36). Mindful of the need to avoid large real exchange rate deviations from equilibrium, the CBG is limiting FX purchases to ensure orderly operation of the market and making its FX available only for the financing of external obligations of the central government. To inform its decision on intervention purchases and liquidity forecasting, the CBG will be updating its external cashflow projection monthly.
- **Strengthening the CBG balance sheet.** The plan to increase the CBG's statutory capital to one billion dalasi (consistent with the CBG Act of 2018) is being implemented. Furthermore, the interest rate on the consolidated Treasury bonds held by the CBG were increased and the related shortfalls paid to bring the returns on these bonds in line with the 2017 audit recommendations. A zero **monthly indicative ceiling** on the CBG's credit to the central government on non-market terms is being observed.

22. Recommendations from the 2019 IMF Financial Sector Stability Review (FSSR) will guide the steps to strengthen financial sector supervision (MEFP ¶37). The CBG will develop and publish a strategic plan addressing FSSR recommendations (**SB for June 2020**) to improve the legal and regulatory framework for banking supervision, enhance crisis preparedness and management, and strengthen the supervision of non-bank financial institutions. Meanwhile, the CBG is working to improve the provision of data by the banks through an ongoing software update. It is also developing a manual for risk-based supervision with TA from AFRITAC West2. In view of the rapid private credit growth and a recent uptick in NPLs, the CBG will review continuously the underwriting standards of the banks and apply rigorously loan classification regulations. While supporting the role of deposit-taking non-bank financial institutions in fostering financial inclusion, the CBG will work to strengthen their oversight through their apex body, the National Association of Cooperative Credit Unions. Additionally, the CBG will work with telecom companies to help develop mobile banking, by tackling regulatory inefficiencies, enhancing oversight and risk monitoring, and fostering consumer awareness and confidence (MEFP ¶38).

D. Governance and Other Structural Reforms

23. Completing the transitional justice agenda is critical for strengthening governance across the public sector and reducing corruption risks (Annex I and MEFP ¶46). Achievements in this area include: (i) publication of a White Paper addressing the findings of the Janneh Commission of Enquiry; (ii) submission of a draft new Constitution, prepared through a broad consultative process, to the National Assembly; (iii) submission of an anti-corruption bill to the National Assembly to create an Anti-Corruption Commission; and (iv) establishing a Human Rights Commission. In parallel, the authorities are pressing ahead with the hearings under the Truth, Reconciliation and Reparations Commission, and work to advance transparency and freedom of information by seeking parliamentary approval for the Access to Information Bill submitted to the National Assembly in December 2019.

24. Governance is also being strengthened in key public economic and financial institutions. The most important steps include: (i) the strengthening of financial reporting at the CBG, as evidenced by the unqualified audit report of its 2018 financial statements; (ii) the ongoing measures to strengthen public procurement, project selection and appraisal; and (iii) improvements in SOE governance and financial management with the support of World Bank TA (see Annex III).

25. The authorities recognize the role of a strong business environment in promoting inclusive growth (MEFP ¶46). Noting the drop in the Gambia's ranking on the Ease of Doing Business, despite considerable improvements in absolute terms, the authorities have set up a business incubation center and are (i) streamlining the business regulatory environment; (ii) adopting systems for efficient tax declarations and payments; (iii) strengthening the AML/CFT framework and its effectiveness based on GIABA recommendations; and (iv) taking measures to address potential loss of correspondent banking relationships (CBRs).

The Growth and Social Protection Agenda

26. The Gambia's NDP (2018–21) outlines the government's plans to support growth and social protection (MEFP ¶¶15–17 and 48):

- Building infrastructure and improving energy generation and distribution is a key strategic priority in the NDP. The reforms at NAWEC aim to enhance the volume and reliability of water and electricity supply. Improved governance and the business environment will support private sector development for inclusive growth.
- Investing in people and building a caring society—also a strategic priority in the NDP—comprises initiative including the establishment of (i) a program for accelerated community development (PACD) with administrative support from UNDP; (ii) a universal health insurance scheme; and (iii) a pension fund for civil servants. The authorities have earmarked 0.5 percent of GDP for these initiatives in the 2020 budget.
- Under the social safety net project supported by the World Bank, the authorities are improving targeting of social protection to ensure that the most vulnerable get access to non-conditional

cash transfers, school feeding program, and basic health services. Spending under the social protection programs will be monitored in addition to the **indicative floor on poverty-reducing spending** under the program (MEFP Table 2).

DATA ISSUES AND CAPACITY DEVELOPMENT

27. Data issues. Data provision is adequate for the monitoring of performance relative to the proposed quantitative targets. Nevertheless, there is an urgent need to improve the quality of fiscal data, notably to enable timely and reliable reconciliation of the data reported in the Statement of Government Operations (SGO) with IFMIS records and with the CBG data on net domestic borrowing. The quality of data for banking supervision also needs to be enhanced, requiring upgraded electronic data submission. The GBoS signaled the need for additional resources to conduct the required census and surveys for improving the compilation of national accounts, CPI, and BoP data.

28. Capacity development. Ongoing support from STA and AFRITAC West2 will be key to improving data quality. The EU-funded resident advisors at MoFEA and the GRA play pivotal roles in helping sharpen institutional capacity at these institutions, while also helping the authorities meet data reporting requirements for program monitoring (Annex V).

PROGRAM MODALITIES, FINANCING ASSURANCES, AND RISKS

29. The ECF arrangement will support the authorities' efforts to achieve debt sustainability, while catalyzing much needed international financial support. The Gambia is currently at high risk of debt distress caused by the heavy debt service payments on its external debt. The ECF arrangement will play a pivotal role in addressing this long-standing issue, building on the improvements in the medium-term debt profile as a result of debt service deferrals, by anchoring continued fiscal discipline and ensuring that resources freed by debt deferrals are properly used. Also, budget support from other IFIs (AfDB, EU, and the World Bank) will depend on a Fund arrangement being in place. As a result, it is expected that this ECF-supported program will contribute markedly to growth and poverty reduction, notably by facilitating the creation of the much-needed fiscal space. To this effect, key elements of the structural reform agenda include: (i) a multi-year reform program to strengthen domestic revenue mobilization, with the emphasis on modernizing the revenue administration based on the TADAT roadmap; (ii) the ongoing reforms to public financial management, including all stages of budgeting, expenditure management, cash management, debt management, and fiscal reporting; and (iii) a multipronged engagement in support of improved economic governance, with the emphasis on public investment process and procurement (based on PIMA recommendations) and the reform of SOEs, including strengthening their corporate governance, financial management, and reporting.

Access, Phasing, and Reviews

30. Staff proposes a total access of SDR 35 million (56.3 percent of quota) phased in seven disbursements (Table 13). The arrangement is proposed for thirty-nine months, in order to allow sufficient time for the seventh disbursement to be made available upon the completion of the sixth and final review. The proposed access amounts to 17.3 percent of quota annually, well within the annual normal access limit of 100 percent of quota for PRGT instruments. The access level is based on staff's assessment of The Gambia's economic outlook, the projected external financing requirement of about US\$258.6 million during the program period and the strength of the envisaged adjustment. By the end of the proposed program, outstanding Fund credit would reach 75 percent of quota (Table 12). The associated BoP need reflects the objective to increase the official reserves by about US\$150 million over the program period to help prepare The Gambia meet the sharp rise in medium-term debt service payments, including from the reprofiled loans, and a projected increase in commercial banks' foreign exchange buffers to meet private sector FX demand. The projected official reserves by the end of the program will also be consistent with about 4½ months of import coverage (assessed to be adequate in the 2017 Article IV consultation).

31. Program performance will be assessed through semi-annual reviews, based on quantitative performance criteria and indicative targets (MEFP Table 2), and structural benchmarks, which have been agreed for the first year of the program (MEFP Table 4). The first and the second review test dates would be June 30, 2020 and December 31, 2020. The quantitative performance criteria would include: (i) a ceiling on net domestic borrowing by the central government; (ii) a ceiling on net domestic assets of the central bank; (iii) a floor on net usable international reserves; (iv) a continuous zero ceiling on new external payment arrears; (v) a continuous zero ceiling on contracting or guaranteeing non-concessional external debt; (vi) a continuous ceiling on outstanding stock of external public debt with original maturity of one year or less; and (vii) a continuous (annual) ceiling on nominal concessional external debt contracted or guaranteed (subject to a minimum grant element of 35 percent). The program will also feature indicative floors for (i) poverty-reducing expenditures, and (ii) tax revenue, and an indicative ceiling on CBG lending to central government at non-market terms. The number of proposed structural benchmarks is limited to four per review, considering The Gambia's fragile status. As noted above, two prior actions, on the 2020 budget and the revised GPPA Act, were met (MEFP Table 2).

Financing Assurances

32. The program is fully financed for its first 12 months, with good prospects for available financing beyond the initial 12-month period. Budget support for 2020, entirely in the form of grants, has been confirmed by AfDB, the EU, and the World Bank (Table 10).⁶ Debt service deferrals, which the authorities have already obtained or are close to obtaining from relevant external creditors, have also contributed to lowering the financing requirement. The potential financial pressure due to delays in the finalization of the offers from OFID and EBID remains well within the

⁶ Budget support from AfDB and World Bank is conditional on the ECF-arrangement being in place.

cash buffers built as a result of better than expected revenue performance in 2019 and is accommodated in the quarterly program. Staff will discuss with the authorities' ways to address these pressures if the finalization of the offers from OFID and EBID takes longer than expected.

Capacity to Repay the Fund

33. The Gambia's capacity to repay is assessed as adequate, based on the country's good record of Fund borrowing and repayment. Moreover, the CBG is strengthening its financial safeguards (see ¶35), further bolstering the safety of IMF lending to the country. Debt service to the Fund would increase from 0.7 percent of exports of goods and services in 2020 to 1.9 percent in 2023 (Table 12). The updated DSA indicates that the risk of debt distress would decline considerably during the program period in the absence of major shocks.

Program Risks and Mitigation Measures

34. Weak institutional capacity could undermine the fiscal strategy and compromise debt sustainability. Capacity challenges that surfaced during the 2019 SMP resulted in external and domestic arrears as well as weaknesses in debt contracting, project selection, and procurement, calling for continued scrutiny. A failure to advance efforts to strengthen governance, including at the SOEs, and reduce vulnerability to corruption could undermine the goal of advancing inclusive growth and the efficient use of public resources. In addition, a deterioration in the political situation and related lapses in expenditure control could undermine the macroeconomic gains so far attained. To mitigate these risks, a well-tailored capacity development is proposed to support program implementation (see Annexes IV and V). The gradual fiscal adjustment (focusing on growing out of domestic debt rather than its aggressive reduction) and the pursuit of "low hanging fruits" on the reform agenda will help strengthen the political buy-in for the program, as will the new initiatives to protect the vulnerable.

Safeguards Assessment

35. An update of the safeguards assessment has been initiated and will be completed by the time of the first program review. The CBG has reappointed the joint auditors for 2019 and took steps to prevent delays encountered during the audit of the 2018 financial statements. It also implemented most of the recommendations of the 2017 safeguards assessment. The remaining issues relate to establishing a capacity building plan for the risk management function and quarterly reporting by the Legal Compliance Unit to the CBG Board on compliance with the 2018 CBG Act.

STAFF APPRAISAL

36. The Gambia deserves credit for attaining important milestones since the democratic transition in 2016/17. The authorities have advanced the transitional justice agenda and are pursuing economic policies, which have bolstered confidence in the economy and helped build external buffers. Consolidating these achievements will require further measures to strengthen fiscal and monetary management and to advance the structural agenda. In this context, the success of the

ECF-supported program will depend on the authorities' resolve to continue to implement bold institutional reforms, address capacity weaknesses, and tackle vulnerability to corruption.

37. The Gambia's NDP provides a clear pathway to improving the living conditions of the population. It identifies key strategic priorities, including investing in people and building a caring society and improvements in infrastructure and the business environment, to support private sector-led inclusive growth. Further steps are needed to ensure better alignment of the NDP with the SDGs, promote its implementation and help exit fragility.

38. The economic and financial policies under the ECF-supported program are appropriately focused, in view of capacity constraints. It is essential that the authorities adhere to the 2020 budget, on which the program is anchored, to consolidate the macroeconomic gains so far achieved and maintain the hard-won debt sustainability. Maintaining fiscal discipline in the run-up to the 2021 elections will require particular vigilance. To this effect, adhering to the fiscal targets and the borrowing plan agreed under the program will be key. The agenda to strengthen the reform momentum in PFM, public procurement, and the governance of the SOEs for transparency and efficient public service delivery is also critical, for which staff encourages the authorities to continue to seek TA as needed.

39. Improved targeting of social safety nets and increasing support for vulnerable households and unemployed youth would foster inclusion and reduce social tensions. To this effect, the authorities are encouraged to address the weaknesses in the implementation of the National Development Plan and strengthen programs in support of agriculture and youth empowerment. There is also a need to improve the tracking of the social programs that were identified with the assistance of the World Bank as particularly important for protecting the vulnerable and draw lessons from their implementation.

40. Steadfast implementation of the fiscal structural reform agenda is essential. Reforms to strengthen the PFM system are ongoing, but further work is needed including to improve cash and Treasury management. Increased transparency in budget preparation and execution, with the emphasis on containing the growth of spending by the subvented agencies, will be critical to garner broad support for reforms. Measures to strengthen the GPPA and enhance value-for-money in public projects will enhance the efficiency of public investment. The envisaged reforms to further strengthen tax administration will deliver substantial benefits in the medium term, if properly sequenced and implemented, consistent with the TADAT roadmap.

41. Monetary policy needs to leverage recent enhancements to the CBG operational framework. To this end, the CBG should implement the recommendations of related AFRITAC West 2 TA and adjust the interest rate corridor, as needed, to avoid competition between its bills and Treasury bills while helping develop the interbank market. In the current environment of ample liquidity and rapid credit growth, greater attention should be paid to the SDF rate, which effectively plays the role of a policy rate, with decisions to adjust the SDF contingent on the new inflation data. Furthermore, the CBG policy guiding FX operations should be strengthened by spelling out the policy objectives, consistent with the exchange regime and monetary policy framework.

42. Strengthened vigilance is needed for a healthy financial intermediation and inclusion.

A strong response to the vulnerabilities identified by the IMF FSSR is crucial to ensure the soundness of the financial sector and improve the legal and regulatory framework for banking supervision. The recent pick-up in NPLs underscores the importance of the measures proposed in the FSSR. In this context, staff welcomes the CBG's early action to formulate a strategic plan to implement the FSSR recommendations and encourages the CBG to seek TA for its implementation. Fostering financial inclusion, which is expected to yield large benefits to the population, especially in the areas where bank presence is weak, will need to be accompanied by stronger oversight of non-bank financial institutions through their apex body, the National Association of Cooperative Credit Unions, as well as by enhancing the monitoring of risks involved in the development of mobile banking.

43. Governance improvements will help sustain the optimism regarding The Gambia's economic prospects.

Strengthening fiscal governance, improving the business environment, strengthening the rule of law (including contract enforcement and protection of creditor and investor rights), and expanding access to information will be key steps.

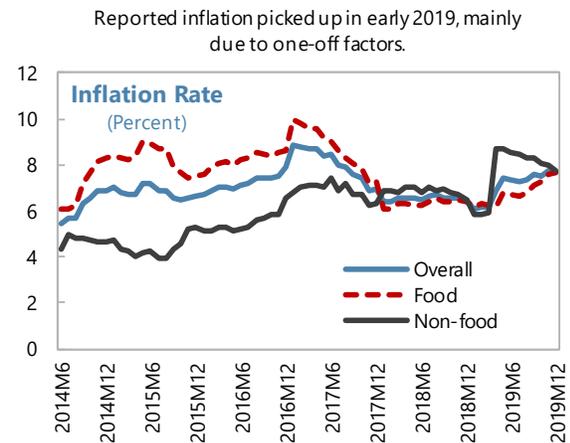
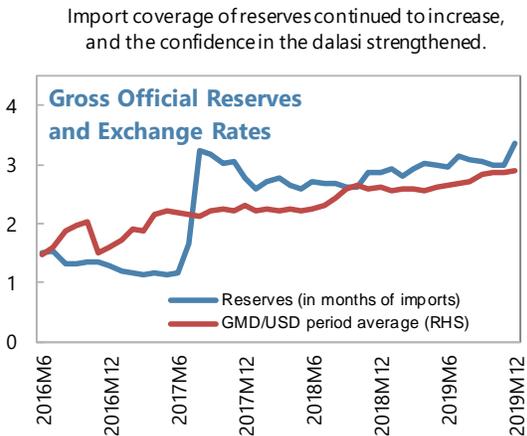
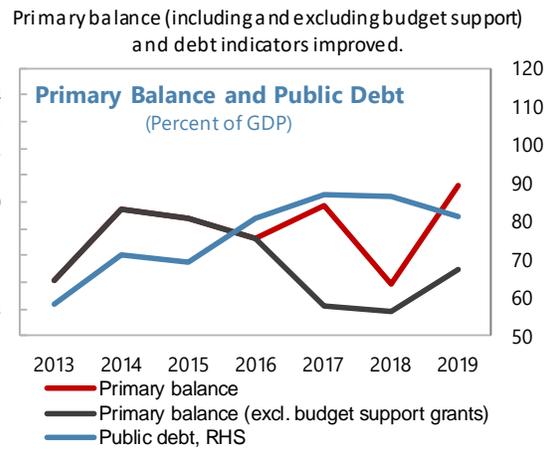
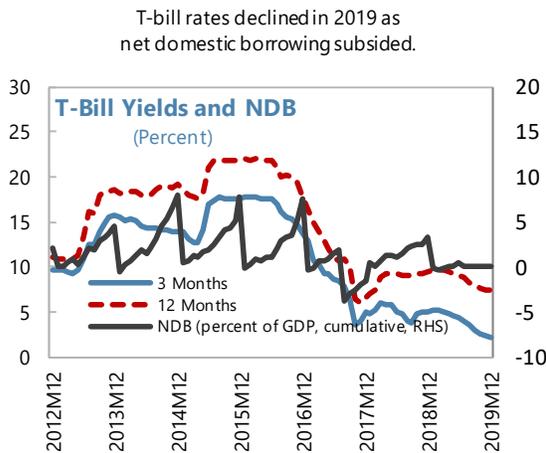
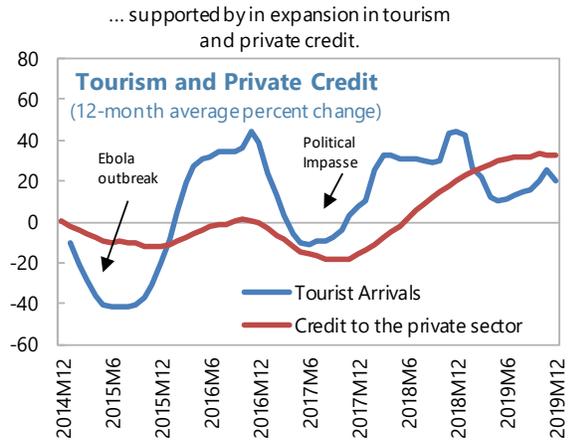
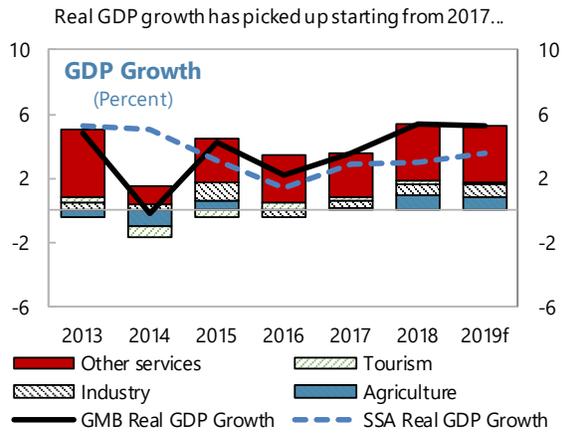
44. Staff supports the authorities' request for a thirty-nine-month arrangement under the ECF, with access equivalent to 56.3 percent of quota.

Proposed Decision

The following decision, which may be adopted by a majority of the votes cast, is proposed for adoption by the Executive Board:

1. The Gambia has requested a 39-month arrangement under the Extended Credit Facility in a total amount of SDR 35 million.
2. The Fund approves the arrangement set forth in EBS/20/13, and decides that The Gambia may request the first disbursement under the arrangement, on the condition that the information provided by The Gambia on the implementation of the measures specified as prior actions in Table 4 of the Memorandum of Economic and Financial Policies, is accurate.

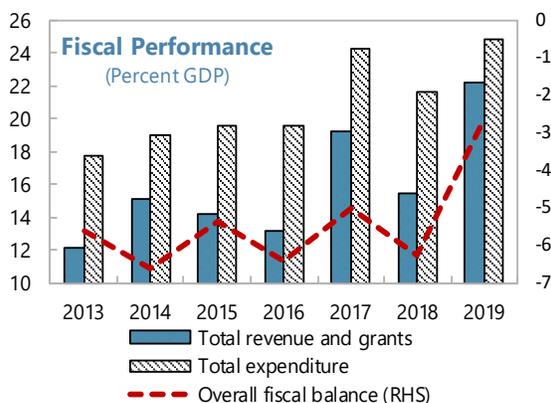
Figure 1. The Gambia: Recent Economic Developments, 2013–19



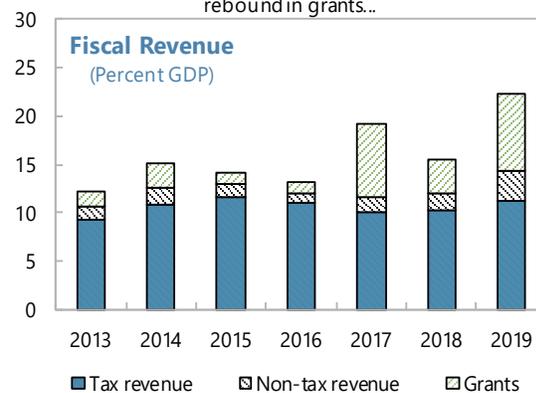
Sources: The Gambian authorities; and IMF staff calculations.

Figure 2. The Gambia: Fiscal and Financial Sector Developments, 2013–19

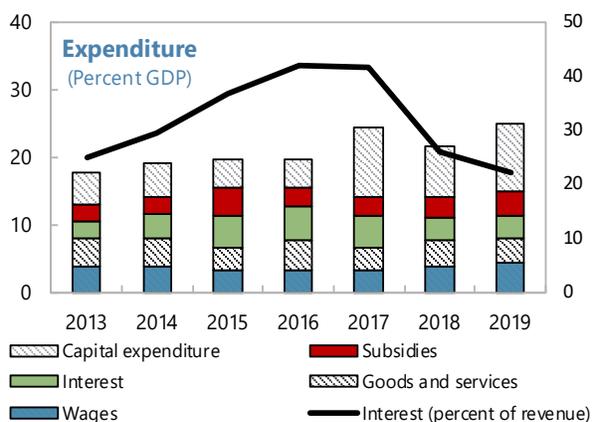
Overall fiscal performance improved in 2019...



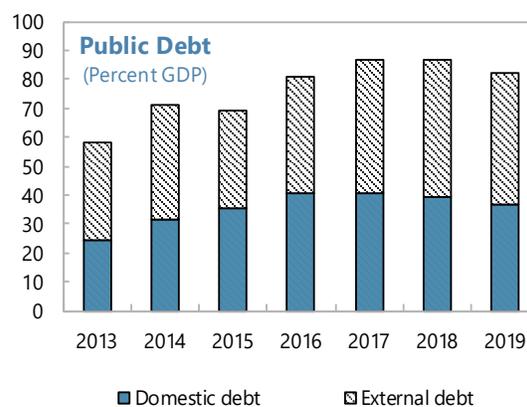
...driven by strong domestic revenue and a rebound in grants...



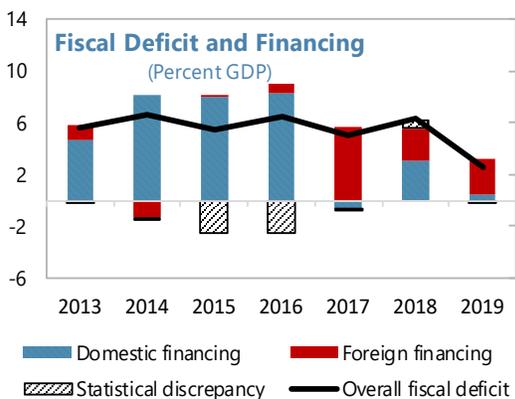
...creating space for an increase in primary spending.



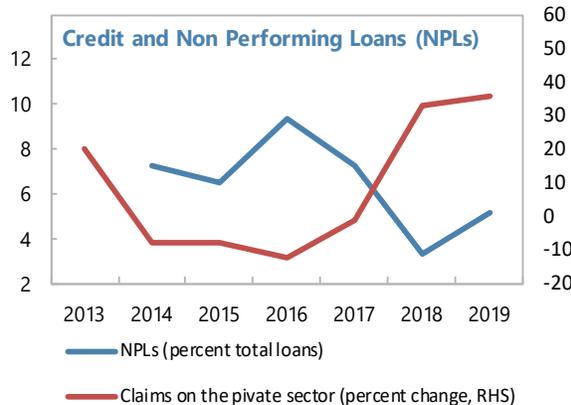
Public debt-to-GDP ratio declined in 2019.



The overall fiscal deficit in 2019 was financed mainly by foreign borrowing for capital spending.

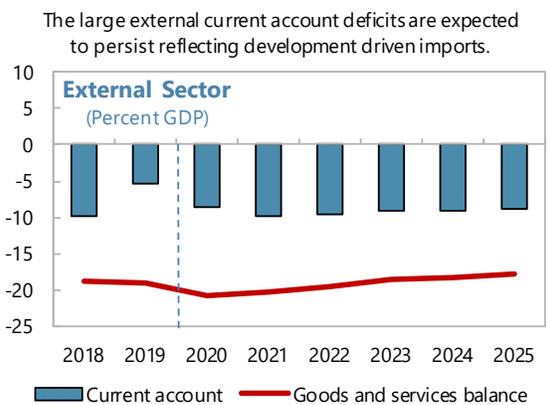
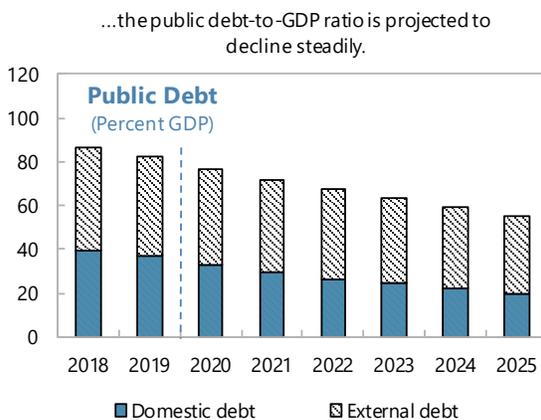
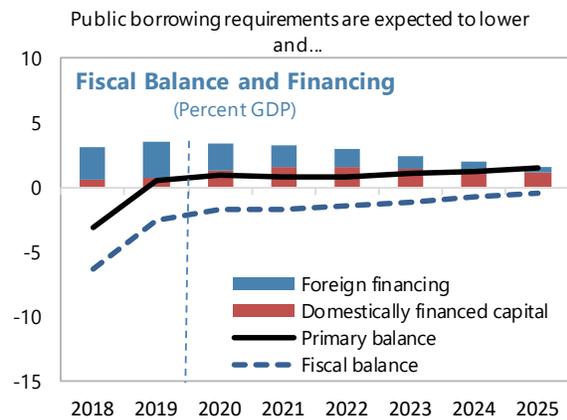
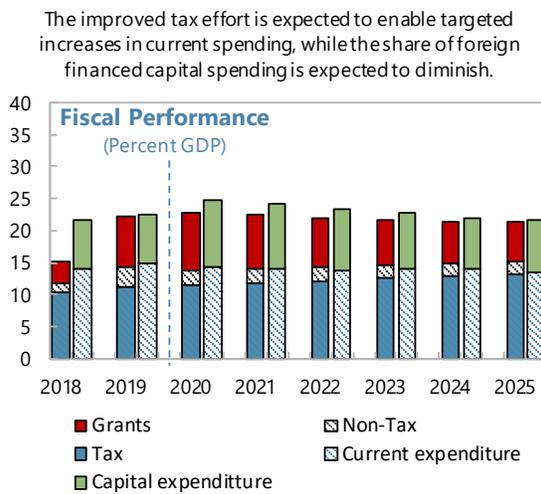
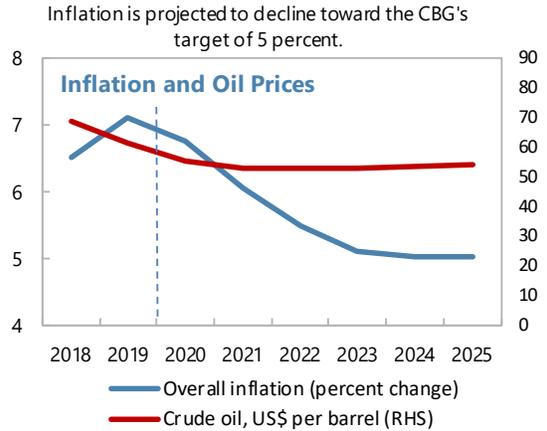
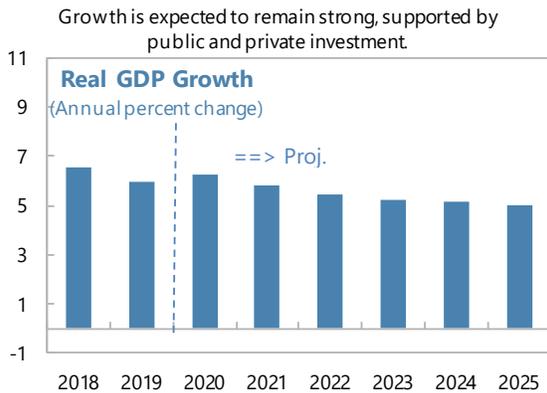


Private credit has picked up since 2016, and the performance of bank portfolios improved but NPLs increased in 2019 due to a localized asset deterioration.



Sources: The Gambian authorities; and IMF staff calculations.

Figure 3. The Gambia: Medium-Term Economic Outlook, 2018–25



Sources: The Gambian authorities; and IMF staff projections.

Table 1. The Gambia: Selected Economic Indicators, 2018–25

	2018	2019		2020	2021	2022	2023	2024	2025
	Act.	EBS/19/26	Prel.	Proj.	Projections				
	(Percent change; unless otherwise indicated)								
National account and prices									
GDP at constant prices	6.5	5.8	6.0	6.3	5.8	5.5	5.2	5.2	5.0
GDP deflator	5.2	5.6	6.4	6.3	5.5	4.8	4.5	4.4	4.8
Consumer prices (average)	6.5	6.1	7.1	6.7	6.0	5.5	5.1	5.0	5.0
Consumer prices (end of period)	6.4	5.9	7.7	6.2	5.8	5.2	5.0	5.0	5.0
External sector									
Exports, f.o.b (US\$ values)	-0.9	6.8	25.2	6.0	7.9	7.3	10.5	10.7	10.1
Imports, f.o.b (US\$ values)	11.9	11.0	14.6	13.6	8.3	6.1	7.0	7.5	7.0
Terms of trade (deterioration = -)	-1.7	-2.4	-4.1	-3.3	-2.9	-0.5	-0.2	-0.2	0.7
Real effective exchange rate (depreciation = -)	-1.5	...	4.6
	(Contributions to broad money growth; percent)								
Money and credit									
Broad money	20.0	15.2	27.1	15.5	11.5
Net foreign assets	14.0	8.1	18.9	9.2	9.2
Net domestic assets	6.0	7.1	8.2	6.3	2.3
<i>Of which:</i>									
Credit to central government (net)	7.1	4.0	3.9	1.2	0.0
Credit to the private sector (net)	5.0	4.0	6.0	3.4	2.3
Velocity (GDP/broad money)	2.3	2.2	2.1	2.0	2.0
	(Percent of GDP; unless otherwise indicated)								
Central government finances									
Domestic revenue (taxes and other revenues)	12.1	13.1	14.4	13.7	14.0	14.3	14.6	15.0	15.2
Grants	3.3	7.7	7.8	9.3	8.5	7.7	7.0	6.3	6.1
Total expenditures and net acquisition of financial assets	21.7	23.9	24.4	24.4	24.2	23.4	22.7	22.0	21.7
<i>Of which:</i> Interest (percent of government revenue)	26.1	24.3	22.3	19.9	18.1	15.3	14.9	13.2	12.6
Net lending (+)/borrowing (-)	-6.2	-3.2	-2.6	-1.7	-1.8	-1.4	-1.1	-0.7	-0.4
Net incurrence of liabilities	5.6	3.2	3.2	2.0	1.8	1.4	1.1	0.7	0.4
Foreign	2.6	1.6	2.7	2.0	1.8	1.4	1.1	0.7	0.4
Domestic	3.0	1.6	0.5	0.0	0.0	0.0	0.0	0.0	0.0
Primary balance	-3.0	0.0	0.6	1.0	0.8	0.8	1.1	1.3	1.5
Public debt	86.6	81.8	82.5	76.8	71.7	67.5	63.5	59.3	55.0
Domestic public debt	39.2	37.2	36.6	32.9	29.5	26.6	24.2	22.1	20.1
External public debt	47.4	44.6	45.9	43.9	42.3	40.8	39.3	37.2	35.0
External public debt (millions of US\$)	756.6	774.5	796.3	836.0	876.7	915.6	949.0	967.7	979.0
External current account balance									
Excluding budget support	-10.7	-13.8	-8.5	-11.9	-12.4	-11.8	-10.9	-10.7	-10.3
Including budget support	-9.7	-10.3	-5.3	-8.7	-9.9	-9.6	-9.0	-9.1	-8.8
Gross official reserves (millions of US\$)	157.0	187.0	225.0	268.0	313.4	349.5	382.4	410.5	450.1
(months of next year's imports of goods and services)	2.7	3.0	3.4	3.7	4.1	4.3	4.4	4.4	4.6
Savings and investment									
Gross investment	17.9	18.3	20.8	20.5	20.0	19.4	18.7	18.4	18.8
<i>Of which:</i> Central government	7.6	8.9	9.8	10.3	10.2	9.5	8.8	8.1	8.2
Gross savings	8.1	8.0	15.4	11.8	10.1	9.8	9.7	9.2	10.0
Memorandum items:									
Nominal GDP (billions of dalasi)	78.6	87.4	88.7	100.2	111.9	123.7	136.0	149.3	164.3
GDP per capita (US\$)	712.5	782.4	750.9	795.8	840.0	883.1	923.2	964.5	1008.5
Use of Fund resources (millions of SDRs)									
Disbursements	0.0	0.0	0.0	10.0	10.0	10.0	5.0	0.0	0.0
Repayments	-5.5	-4.3	-4.3	-3.6	-4.0	-2.8	-4.1	-3.9	-3.6

Sources: The Gambian authorities; and IMF staff estimates and projections.

Table 2. The Gambia: Statement of Central Government Operations, 2018–25
(Millions of local currency)

	2018		2019		2020		2021	2022	2023	2024	2025
	Act.	EBS/19/26	Prel.	Budget	Proj.	Projections					
Revenue	12,135	17,871	19,694	24,472	22,951	25,170	27,198	29,409	31,801	34,923	
Domestic revenue	9,502	11,411	12,760	13,636	13,682	15,634	17,663	19,901	22,378	24,982	
Taxes	8,139	9,762	9,986	11,601	11,590	13,282	15,046	17,014	19,209	21,516	
Taxes on income, profits, and capital gains	2,048	2,404	2,649	2,875	2,877	3,319	3,795	4,403	5,032	5,692	
Domestic taxes on goods and services	3,978	4,772	4,840	5,558	5,704	6,504	7,327	8,153	9,181	10,267	
Taxes on international trade and transactions	2,093	2,563	2,482	3,151	2,992	3,440	3,902	4,435	4,970	5,529	
Other taxes	20	22	15	17	17	19	21	23	25	28	
Non-tax	1,363	1,649	2,775	2,035	2,092	2,352	2,617	2,887	3,169	3,465	
Grants	2,633	6,460	6,933	10,836	9,269	9,536	9,535	9,508	9,423	9,942	
Budget support	794	2,792	2,790	2,700	3,233	2,801	2,715	2,543	2,316	2,508	
Project grants	1,839	3,669	4,143	8,136	6,036	6,735	6,820	6,965	7,107	7,434	
Expenditures	17,008	20,923	22,006	28,387	24,665	27,131	28,969	30,891	32,863	35,578	
Expenses	11,004	13,175	13,293	14,855	14,318	15,740	17,170	18,960	20,820	22,161	
Compensation of employees	3,058	4,184	3,961	4,469	4,469	4,991	5,517	6,068	6,662	7,329	
Use of goods and services	3,066	3,317	3,179	3,108	3,046	3,456	4,010	4,637	5,600	6,418	
Interest	2,477	2,770	2,843	2,948	2,723	2,828	2,707	2,963	2,944	3,157	
External	420	448	371	697	472	509	568	601	649	861	
Domestic	2,057	2,322	2,472	2,251	2,251	2,318	2,138	2,362	2,294	2,296	
Subsidies and transfers	2,403	2,904	3,310	4,330	4,080	4,465	4,936	5,292	5,614	5,257	
Of which: Subsidies to SOEs	403	862	510	650	650	
NAWEC	253	512	60	500	300	
NFSPMC	150	350	450	150	350	
Net acquisition of nonfinancial assets	6,004	7,748	8,713	13,532	10,347	11,392	11,799	11,931	12,043	13,416	
Acquisitions of nonfinancial assets	6,004	7,748	8,713	13,532	10,347	11,392	11,799	11,931	12,043	13,416	
Foreign financed ¹	5,535	6,863	8,032	12,184	9,027	9,677	9,823	10,037	10,175	11,529	
Gambia local fund	469	885	681	1,348	1,320	1,715	1,976	1,895	1,868	1,887	
Net lending (+)/borrowing (-)	-4,872	-3,052	-2,312	-3,915	-1,714	-1,961	-1,771	-1,483	-1,062	-654	
Financing	4,455	3,053	2,537	3,864	1,713	1,961	1,771	1,483	1,063	655	
Net acquisition of financial assets	68	0	-329	0	-255	0	0	0	0	0	
Net incurrence of liabilities	4,387	3,053	2,866	3,864	1,968	1,961	1,771	1,483	1,063	655	
Domestic	2,379	1,658	452	-219	-50	0	0	0	0	0	
Net borrowing	2,623	2,024	1,063	0	500	0	0	0	0	0	
Bank	1,989	1,624	1,192	...	500	0	0	0	0	0	
Nonbank	634	400	-129	...	0	0	0	0	0	0	
Domestic Amortization	-539	
Change in arrears	-244	-367	-611	-300	-550	0	0	0	0	0	
Capital revenues	620	
Foreign	2,008	1,395	2,414	4,083	2,018	1,961	1,771	1,483	1,063	655	
Loans	2,008	1,395	2,414	2,083	2,018	1,961	1,771	1,483	1,063	655	
Borrowing	3,696	3,194	3,889	4,048	2,991	2,942	3,003	3,071	3,068	4,095	
Budget support	0	0	0	0	0	0	0	0	0	0	
Project support	3,696	3,194	3,889	4,048	2,991	2,942	3,003	3,071	3,068	4,095	
Amortization	-1,687	-1,799	-1,475	-1,965	-973	-981	-1,232	-1,589	-2,006	-3,441	
Exceptional Financing	2000	
Statistical discrepancy	417	0	-225	50	0	
Memorandum items:											
Government revenue (excluding grants)	9,502	10,876	12,760	13,636	13,682	15,634	17,663	19,901	22,378	24,982	
Primary balance	-2,396	-282	531	-966	1,010	867	936	1,480	1,882	2,503	
Domestic primary balance	506	120	1,629	382	768	1,007	1,223	2,009	2,634	4,090	
Primary balance (ex. budget support grants)	-3,190	-3,074	-2,259	-3,666	-2,223	-1,935	-1,779	-1,062	-435	-5	
Total debt	68,066	71,487	72,148	72,148	75,904	79,211	82,389	85,271	87,405	89,307	
of which: Domestic public debt	30,782	32,532	32,454	32,454	32,954	32,954	32,954	32,954	32,954	32,954	
Interest payments as a percent of govt. revenue	26.1	24.3	22.3	21.6	19.9	18.1	15.3	14.9	13.2	12.6	

Sources: The Gambian authorities; and IMF staff estimates and projections.

¹ Calculated as the sum of project grants, external project loans, and changes in project accounts.

Table 3. Statement of Central Government Operations, 2018–25
(Percent of GDP)

	2018		2019		2020		2021	2022	2023	2024	2025
	Act.	EBS/19/26	Prel.	Budget	Proj.	Projections					
Revenue	15.4	20.8	22.2	24.4	22.9	22.5	22.0	21.6	21.3	21.3	
Domestic revenues	12.1	13.1	14.4	13.6	13.7	14.0	14.3	14.6	15.0	15.2	
Taxes	10.4	11.2	11.3	11.6	11.6	11.9	12.2	12.5	12.9	13.1	
Taxes on income, profits, and capital gains	2.6	2.8	3.0	2.9	2.9	3.0	3.1	3.2	3.4	3.5	
Domestic taxes on goods and services	5.1	5.5	5.5	5.5	5.7	5.8	5.9	6.0	6.1	6.2	
Taxes on international trade and transactions	2.7	2.9	2.8	3.1	3.0	3.1	3.2	3.3	3.3	3.4	
Other taxes	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Non-tax	1.7	1.9	3.1	2.0	2.1	2.1	2.1	2.1	2.1	2.1	
Grants	3.3	7.7	7.8	10.8	9.3	8.5	7.7	7.0	6.3	6.1	
Budget support	1.0	3.5	3.1	2.7	3.2	2.5	2.2	1.9	1.6	1.5	
Project support	2.3	4.2	4.7	8.1	6.0	6.0	5.5	5.1	4.8	4.5	
Expenditures	21.6	23.9	24.8	28.3	24.6	24.2	23.4	22.7	22.0	21.7	
Expenses	14.0	15.1	15.0	14.8	14.3	14.1	13.9	13.9	13.9	13.5	
Compensation of employees	3.9	4.8	4.5	4.5	4.5	4.5	4.5	4.5	4.5	4.5	
Use of goods and services	3.9	3.8	3.6	3.1	3.0	3.1	3.2	3.4	3.7	3.9	
Interest	3.2	3.2	3.2	2.9	2.7	2.5	2.2	2.2	2.0	1.9	
External	0.5	0.5	0.4	0.7	0.5	0.5	0.5	0.4	0.4	0.5	
Domestic	2.6	2.7	2.8	2.2	2.2	2.1	1.7	1.7	1.5	1.4	
Subsidies and transfers	3.1	3.3	3.7	4.3	4.1	4.0	4.0	3.9	3.8	3.2	
Of which: Subsidies to SOEs	0.5	1.0	0.6	0.6	0.6	
NAWEC	0.3	0.6	0.1	0.5	0.3	
NFSPMC	0.2	0.4	0.5	0.1	0.3	
Net acquisition of nonfinancial assets	7.6	8.9	9.8	13.5	10.3	10.2	9.5	8.8	8.1	8.2	
Acquisitions of nonfinancial assets	7.6	8.9	9.8	13.5	10.3	10.2	9.5	8.8	8.1	8.2	
Foreign financed ¹	7.0	7.9	9.1	12.2	9.0	8.6	7.9	7.4	6.8	7.0	
Gambia local fund	0.6	1.0	0.8	1.3	1.3	1.5	1.6	1.4	1.3	1.1	
Net lending (+)/borrowing (–)	-6.2	-3.2	-2.6	-3.9	-1.7	-1.8	-1.4	-1.1	-0.7	-0.4	
Financing	5.7	3.2	2.9	3.9	1.7	1.8	1.4	1.1	0.7	0.4	
Net acquisition of financial assets	0.1	0.0	-0.4	0.0	-0.3	0.0	0.0	0.0	0.0	0.0	
Net incurrence of liabilities	5.6	3.2	3.2	3.9	2.0	1.8	1.4	1.1	0.7	0.4	
Domestic	3.0	1.6	0.5	-0.2	0.0	0.0	0.0	0.0	0.0	0.0	
Net borrowing	3.3	2.0	1.2	0.0	0.5	0.0	0.0	0.0	0.0	0.0	
Bank	2.5	1.5	1.3	...	0.5	0.0	0.0	0.0	0.0	0.0	
Nonbank	0.8	0.5	-0.1	...	0.0	0.0	0.0	0.0	0.0	0.0	
Domestic Amortization	-0.5	
Change in arrears	-0.3	-0.4	-0.7	-0.3	-0.5	0.0	0.0	0.0	0.0	0.0	
Capital revenues	0.6	
Foreign	2.6	1.6	2.7	4.1	2.0	1.8	1.4	1.1	0.7	0.4	
Loans	2.6	1.6	2.7	2.1	2.0	1.8	1.4	1.1	0.7	0.4	
Borrowing	4.7	3.7	4.4	4.0	3.0	2.6	2.4	2.3	2.1	2.5	
Budget support	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	
Project support	4.7	3.7	4.4	4.0	3.0	2.6	2.4	2.3	2.1	2.5	
Amortization	-2.1	-2.1	-1.7	-2.0	-1.0	-0.9	-1.0	-1.2	-1.3	-2.1	
Exceptional Financing	2.0	
Statistical discrepancy	0.5	0.0	-0.3	0.1	0.0	
Memorandum items:											
Primary balance	-3.0	0.0	0.6	-1.0	1.0	0.8	0.8	1.1	1.3	1.5	
Domestic Primary balance	0.6	0.1	1.8	1.0	0.8	0.9	1.0	1.5	1.8	2.5	
Primary balance (ex. budget support grants)	-4.1	-3.5	-2.5	-3.7	-2.2	-1.7	-1.4	-0.8	-0.3	0.0	
Total debt	86.6	81.8	81.4	72.0	75.8	70.8	66.6	62.7	58.5	54.4	
of which: Domestic public debt	39.2	37.2	36.6	32.4	32.9	29.5	26.6	24.2	22.1	20.1	
Interest payments as a percent of govt. revenue	26.1	24.3	22.3	21.6	19.9	18.1	15.3	14.9	13.2	12.6	

Sources: The Gambian authorities; and IMF staff estimates and projections.

¹ Calculated as the sum of project grants, external project loans, and changes in project accounts.

Table 4. The Gambia: Statement of Central Government Operations, 2019–20
(Cumulative, millions of local currency)

	2019	2020			
	Prel.	Q1	Q2	Q3	Q4
		Projections			
Revenue	19,694	4,018	10,244	15,563	22,951
Domestic revenue	12,760	3,415	6,834	10,284	13,682
Taxes	9,986	2,866	5,878	8,705	11,590
Taxes on income, profits, and capital gains	2,649	840	1,621	2,236	2,877
Domestic taxes on goods and services	4,840	1,331	2,762	4,210	5,704
Taxes on international trade and transactions	2,482	692	1,487	2,246	2,992
Other taxes	15	3	8	13	17
Non-tax	2,775	549	956	1,579	2,092
Grants	6,933	604	3,410	5,279	9,269
Budget support	2,790	0	2,082	2,442	3,233
Project grants	4,143	604	1,328	2,837	6,036
Expenditures	22,006	5,694	11,139	17,176	24,665
Expenses	13,293	3,924	7,612	10,953	14,318
Compensation of employees	3,961	1,117	2,235	3,352	4,469
Use of goods and services	3,179	731	1,614	2,315	3,046
Interest	2,843	718	1,399	2,064	2,723
External	371	94	212	314	472
Domestic	2,472	625	1,187	1,750	2,251
Subsidies and transfers	3,310	1,357	2,365	3,222	4,080
of which: Subsidies to SOEs	510	500	650	650	650
NAWEC	60	150	300	300	300
NFSPMC	450	350	350	350	350
Net acquisition of nonfinancial assets	8,713	1,771	3,526	6,224	10,347
Acquisitions of nonfinancial assets	8,713	1,771	3,526	6,224	10,347
Foreign financed	8,032	1,262	2,674	4,991	9,027
Gambia local fund	681	509	852	1,233	1,320
Net lending (+)/borrowing (–)	-2,312	-1,676	-894	-1,613	-1,714
Financing	2,537	1,675	894	1,613	1,713
Net acquisition of financial assets	-329	-255	-255	-255	-255
Net incurrence of liabilities	2,866	1,930	1,149	1,868	1,968
Domestic	452	1,467	278	475	-50
Net borrowing	1,063	1,650	550	750	500
Bank	1,192	1,650	550	750	500
Central bank	-1,059	1,400	50	0	-500
Commercial banks	2,251	250	500	750	1,000
Nonbank	-129	0	0	0	0
Change in arrears	-611	-183	-272	-275	-550
Foreign	2,414	463	871	1,393	2,018
Loans	2,414	463	871	1,393	2,018
Borrowing	3,889	658	1,346	2,153	2,991
Amortization	-1,475	-195	-475	-760	-973
Statistical discrepancy	-225	0	0	0	0
Memorandum items:					
Government revenue (excluding grants)	12,760	3,415	6,834	10,284	13,682
Overall balance	-2,312	-1,676	-894	-1,613	-1,714
Primary balance	531	-958	505	451	1,010
Domestic primary balance	1,629	-300	-232	162	768
Primary balance (ex. budget support grants)	-2,259	-958	-1,578	-1,991	-2,223

Sources: The Gambian authorities; and IMF staff estimates and projections.

Table 5. The Gambia: Monetary Accounts, 2018–21¹

(Millions of local currency, unless otherwise indicated)

	2018	2019		2020	2021
	Act.	EBS/19/26	Prel.	Proj.	Proj.
I. Monetary Survey					
Net foreign assets	10,407	13,148	16,784	20,728	25,269
(in millions of U.S. dollars)	211	267	341	394	468
<i>Of which</i> : CBG	92	116	172	205	258
Net domestic assets	23,338	25,733	26,091	28,805	29,940
Domestic credit	28,388	31,086	31,693	33,649	34,784
Claims on central government (net)	21,328	22,678	22,636	23,136	23,136
Claims on other financial corporations	5	5	0	0	0
Claims on other public sector ²	1,366	1,366	1,328	1,328	1,328
Claims on private sector	5,692	7,037	7,729	9,185	10,320
Other items (net) ³	-5,052	-5,353	-5,602	-4,844	-4,844
Broad money	33,745	38,881	42,875	49,533	55,209
Currency outside banks	6,568	7,568	7,844	8,806	9,816
Deposits	27,176	31,313	35,031	40,726	45,393
II. Central Bank Survey					
Net foreign assets	4,514	5,726	8,474	10,083	12,710
Foreign assets	8,680	9,570	12,494	14,631	17,847
Foreign liabilities	-4,166	-3,845	-4,021	-4,548	-5,137
Net domestic assets	7,335	7,235	5,414	5,672	4,936
Domestic credit	7,808	7,508	6,786	6,286	6,286
Claims on central government (net)	7,726	7,426	6,668	6,168	6,168
Claims on other financial corporations	5	5	0	0	0
Claims on private sector	107	107	119	119	119
Claims on public enterprises	0	0	0	0	0
Other items (net)	-473	-274	-1,373	-614	-1,351
Reserve money	11,849	12,960	13,888	15,755	17,646
Currency outside banks	6,568	7,568	7,844	8,806	9,816
Commercial bank deposits	5,281	5,392	6,044	6,949	7,830

Sources: The Gambian authorities; and IMF staff estimates and projections.

¹ End of period.² Includes public enterprises and the local government.³ Including valuation effects.

Table 6. The Gambia: Monetary Accounts, 2018–21¹

(Percent change, unless otherwise indicated)

	2018		2019		2020	2021
	Act.	EBS/19/26	Prel.	Proj.	Proj.	
I. Monetary Survey						
(Percent change; contribution to broad money growth)						
Broad money	20.0	15.2	27.1	15.5	11.5	
Net foreign assets	14.0	8.1	18.9	9.2	9.2	
Net domestic assets	6.0	7.1	8.2	6.3	2.3	
II. Central Bank Survey						
(Percent change; contribution to reserve money growth)						
Reserve money	16.5	9.4	17.2	13.4	12.0	
Net foreign assets	17.0	10.2	33.4	11.6	16.7	
Net domestic assets	-0.4	-0.8	-16.2	1.9	-4.7	
(Percent change; unless otherwise indicated)						
<i>Memorandum Items:</i>						
Credit to the private sector	32.9	23.6	35.8	18.8	12.4	
Currency in circulation	15.8	15.2	19.4	12.3	11.5	
Demand deposits	29.7	11.0	44.8	12.7	11.5	
Time and savings deposits	15.6	18.3	17.6	19.4	11.5	
Net international reserves (millions of U.S. dollars)	125.5	150.7	188.7	220.3	259.7	
Money velocity (levels)	2.3	2.2	2.1	2.0	2.0	
Money multiplier (levels)	2.8	3.0	3.1	3.1	3.1	
Broad money (percent of GDP)	42.9	44.5	48.4	49.4	49.3	
Credit to the private sector (percent of GDP)	7.2	8.1	8.7	9.2	9.2	
Central government financing (millions of dalasi)						
Central bank	490	-300	-1,059	-500	0	
Commercial banks	1,507	1,650	2,367	1,000	0	

Sources: The Gambian authorities; and IMF staff estimates and projections.

¹ End of period.

Table 7. The Gambia: Monetary Accounts, 2019–20¹

(Millions of local currency)

	2019		2020			
	Dec.		Mar.	Jun.	Sep.	Dec.
	EBS/19/26	Prel.	Projections			
I. Monetary Survey						
Net foreign assets	13,148	16,784	16,724	18,846	19,436	20,728
(in millions of U.S. dollars)	267	341	325	363	372	394
<i>Of which</i> : CBG	116	171	175	189	194	205
Net domestic assets	25,733	26,091	27,815	27,357	28,432	28,805
Domestic credit	31,086	31,693	33,417	32,959	34,034	33,649
Claims on central government (net)	22,678	22,636	24,286	23,186	23,386	23,136
Claims on other financial corporations	5	0	0	0	0	0
Claims on other public sector ²	1,366	1,328	1,328	1,328	1,328	1,328
Claims on private sector	7,037	7,729	7,803	8,445	9,320	9,185
Other items (net) ³	-5,353	-5,602	-5,602	-5,602	-5,602	-4,844
Broad money	38,881	42,875	44,539	46,204	47,868	49,533
Currency outside banks	7,568	7,844	8,148	8,453	8,757	8,806
Deposits	31,313	35,031	36,391	38,184	40,068	40,726
II. Central Bank Survey						
Net foreign assets	5,726	8,474	8,657	9,369	9,578	10,083
Foreign assets	9,570	12,494	12,678	13,654	13,862	14,631
Foreign liabilities	-3,845	-4,021	-4,021	-4,284	-4,284	-4,548
Net domestic assets	7,235	5,414	6,843	5,593	5,615	5,672
Domestic credit	7,508	6,786	8,186	6,836	6,786	6,286
Claims on central government (net)	7,426	6,668	8,068	6,718	6,668	6,168
Assets	11,249	10,924	10,924	10,924	10,924	10,924
Liabilities	-3,822	-4,256	-2,856	-4,206	-4,256	-4,756
Claims on other financial corporations	5	0	0	0	0	0
Claims on private sector	107	119	119	119	119	119
Claims on public enterprises	0	0	0	0	0	0
Other items (net, incl. liquidity management operations)	-274	-1,373	-1,344	-1,243	-1,172	-614
Reserve money	12,960	13,888	15,500	14,962	15,193	15,755
Currency outside banks	7,568	7,844	8,754	8,450	8,581	8,806
Commercial bank deposits	5,392	6,044	6,746	6,512	6,612	6,949
III. Commercial Banks Balance Sheet						
Net foreign assets	7,422	8,310	8,067	9,477	9,858	10,645
Foreign assets	8,031	8,914	8,672	10,081	10,462	11,249
Foreign liabilities	-609	-604	-604	-604	-604	-604
Net domestic assets	23,891	26,722	28,324	28,707	30,211	30,082
Net domestic claims	28,940	30,951	31,976	32,635	33,860	34,311
Claims on central bank	5,392	6,044	6,746	6,512	6,612	6,949
Net claims on government	15,252	15,969	16,219	16,469	16,719	16,969
Claims	15,252	15,969	16,219	16,469	16,719	16,969
Liabilities	0	0	0	0	0	0
Claims on other sectors	8,296	8,939	9,012	9,654	10,529	10,394
Claims on public nonfinancial corporations	1,366	1,328	1,328	1,328	1,328	1,328
Claims on private sector	6,930	7,611	7,684	8,327	9,201	9,066
Other items net	-5,049	-4,230	-3,652	-3,928	-3,649	-4,230
Liabilities	31,313	35,031	36,391	38,184	40,068	40,726
Liabilities to central bank	0	0	0	0	0	0
Deposits incl. in broad money	31,313	35,031	36,391	38,184	40,068	40,726

Sources: The Gambian authorities; and IMF staff estimates and projections.

¹ End of period.² Includes public enterprises and local governments.³ Including valuation effects.

Table 8. The Gambia: Balance of Payments, 2018–25
(Millions of U.S. dollars, unless otherwise indicated)

	2018	2019		2020	2021	2022	2023	2024	2025
	Act.	EBS/19/26	Prel.			Projections			
1. Current account									
A. Goods and services	-307.2	-348.0	-334.7	-399.4	-426.0	-442.4	-456.3	-482.1	-505.9
Goods (net)	-405.0	-454.1	-451.8	-524.4	-568.8	-601.8	-638.0	-680.0	-720.5
Exports, f.o.b.	115.0	122.8	144.0	152.6	164.7	176.7	195.3	216.1	237.9
Imports, f.o.b.	-520.0	-576.9	-595.7	-677.0	-733.5	-778.5	-833.2	-896.1	-958.5
Services (net)	97.8	106.2	117.1	125.0	142.8	159.4	181.7	197.9	214.6
Services exports	198.6	215.3	227.3	251.6	271.8	293.2	319.6	346.6	373.9
Of which: Travel income	153.8	168.6	181.3	203.4	219.6	237.3	256.5	274.8	294.3
Services imports	-100.8	-109.1	-110.3	-126.5	-129.0	-133.8	-137.9	-148.7	-159.3
B. Income (net)	-29.2	-30.1	-30.1	-31.0	-32.0	-32.3	-31.2	-32.2	-33.4
Income credits	2.3	2.3	2.3	2.4	2.5	2.5	2.4	2.5	2.6
Income debits	-31.4	-32.4	-32.4	-33.4	-34.5	-34.9	-33.6	-34.8	-36.0
C. Current transfers	178.1	198.3	270.5	262.5	251.7	257.7	266.9	274.8	290.6
Official transfers	15.0	61.4	55.8	62.1	52.4	49.8	45.6	40.7	43.2
Remittances	150.8	124.3	202.4	188.1	186.7	195.1	207.1	219.5	232.5
Other transfers	12.3	12.6	12.3	12.3	12.6	12.9	14.2	14.6	14.9
Current account (excl. budget support)	-173.3	-241.2	-150.1	-230.1	-258.7	-266.7	-266.1	-280.2	-291.9
Current account (incl. budget support)	-158.3	-179.8	-94.3	-167.9	-206.3	-217.0	-220.5	-239.5	-248.7
2. Capital and financial account									
A. Capital account	38.0	73.5	73.5	116.0	126.0	125.0	125.0	125.0	128.0
B. Financial account	134.6	142.7	110.1	86.1	117.3	118.0	127.1	148.1	165.4
Foreign direct investment	90.8	93.1	93.3	97.8	103.9	112.1	118.8	130.1	138.0
Portfolio investment	4.1	3.9	4.0	4.0	4.0	4.3	4.7	5.0	5.4
Other investment	39.7	45.6	12.8	-15.7	9.4	1.6	3.6	12.9	22.0
Capital and financial account	172.6	216.2	183.6	202.1	243.3	243.0	252.1	273.1	293.4
Errors and omissions	6.6	0.0	-15.0	0.0	0.0	0.0	0.0	0.0	0.0
Overall balance	20.9	36.4	74.3	34.2	37.0	26.0	31.6	33.6	44.7
Financing									
Net international reserves (increase -)	-20.9	-36.4	-74.3	-34.2	-37.0	-26.0	-31.6	-33.6	-44.7
Change in gross international reserves	-13.0	-30.0	-68.0	-43.0	-45.4	-36.0	-32.9	-28.1	-39.6
Use of IMF resources (net)	-7.8	-6.4	-6.3	8.8	8.4	10.0	1.3	-5.5	-5.1
Disbursements	0.0	0.0	0.0	13.8	13.9	14.0	7.0	0.0	0.0
Repayments	-7.8	-6.4	-6.3	-5.0	-5.5	-3.9	-5.7	-5.5	-5.1
Memorandum items:									
Exports of goods and services	313.6	338.1	371.3	404.1	436.5	469.9	514.9	562.7	611.9
Imports of goods and services	-620.8	-686.0	-706.0	-803.5	-862.4	-912.3	-971.2	-1044.8	-1117.8
GMD per U.S. dollar, period average	48.4	...	50.3
Financing gap	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Gross international reserves									
US\$ millions	157.0	187.0	225.0	268.0	313.4	349.5	382.4	410.5	450.1
Months of current year's imports of goods and services	3.0	3.3	3.8	4.0	4.4	4.6	4.7	4.7	4.8
Months of next year's imports of goods and services	2.7	3.0	3.4	3.7	4.1	4.3	4.4	4.4	4.6
Net usable international reserves									
US\$ millions	125.5	150.7	188.7	220.3	259.7	285.5	316.9	350.2	394.8
Months of current year's imports of goods and services	2.4	2.6	3.2	3.3	3.6	3.8	3.9	4.0	4.2
Months of next year's imports of goods and services	2.1	2.4	2.8	3.1	3.4	3.5	3.6	3.8	4.0

Sources: The Gambian authorities; and IMF staff estimates and projections.

Table 9. The Gambia: Balance of Payments, 2018–25
(Percent of GDP)

	2018	2019		2020	2021	2022	2023	2024	2025
	Act.	EBS/19/26	Prel.						
				Projections					
1. Current account									
A. Goods and services	-18.9	-19.9	-19.0	-20.7	-20.3	-19.5	-18.7	-18.4	-17.9
Goods (net)	-24.9	-25.9	-25.6	-27.2	-27.2	-26.5	-26.1	-25.9	-25.5
Exports, f.o.b.	7.1	7.0	8.2	7.9	7.9	7.8	8.0	8.2	8.4
Imports, f.o.b.	-32.0	-33.0	-33.8	-35.2	-35.0	-34.3	-34.1	-34.1	-33.9
Services (net)	6.0	6.1	6.6	6.5	6.8	7.0	7.4	7.5	7.6
Services exports	12.2	12.3	12.9	13.1	13.0	12.9	13.1	13.2	13.2
<i>Of which: travel</i>	9.5	9.6	10.3	10.6	10.5	10.5	10.5	10.5	10.4
Services imports	-6.2	-6.2	-6.3	-6.6	-6.2	-5.9	-5.7	-5.7	-5.6
B. Income (net)	-1.8	-1.7	-1.7	-1.6	-1.5	-1.4	-1.3	-1.2	-1.2
Income credits	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Income debits	-1.9	-1.9	-1.8	-1.7	-1.6	-1.5	-1.4	-1.3	-1.3
<i>Of which: Interest on government debt</i>	0.5	0.5	0.6	0.5	0.5	0.5	0.4	0.4	0.5
C. Current transfers	11.0	11.3	15.3	13.6	12.0	11.4	10.9	10.5	10.3
Official transfers	0.9	3.5	3.2	3.2	2.5	2.2	1.9	1.6	1.5
Remittances	9.3	7.1	11.5	9.8	8.9	8.6	8.5	8.4	8.2
Other transfers	0.8	0.7	0.7	0.6	0.6	0.6	0.6	0.6	0.5
Current account (excl. budget support)	-10.7	-13.8	-8.5	-11.9	-12.4	-11.8	-10.9	-10.7	-10.3
Current account (incl. budget support)	-9.7	-10.3	-5.3	-8.7	-9.9	-9.6	-9.0	-9.1	-8.8
2. Capital and financial account									
A. Capital account	2.3	4.2	4.2	6.0	6.0	5.5	5.1	4.8	4.5
B. Financial account	8.3	8.1	6.2	4.5	5.6	5.2	5.2	5.6	5.8
Foreign direct investment	5.6	5.3	5.3	5.1	5.0	4.9	4.9	5.0	4.9
Portfolio investment	0.3	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2
Other investment	2.4	2.6	0.7	-0.8	0.4	0.1	0.1	0.5	0.8
Capital and financial account	10.6	12.3	10.4	10.5	11.6	10.7	10.3	10.4	10.4
Errors and omissions	0.4	0.0	-0.9	0.0	0.0	0.0	0.0	0.0	0.0
Overall balance	1.3	2.1	4.2	1.8	1.8	1.1	1.3	1.3	1.6
Financing gap	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0

Sources: The Gambian authorities; and IMF staff estimates and projections.

Table 10. The Gambia: External Financing Needs, 2020–25

(Millions of U.S. dollars)

	2020	2021	2022	2023	2024	2025
	Projections					
1. Total financing requirement	-297.3	-327.3	-327.8	-327.8	-343.6	-390.7
Current account deficit (excl. budget support)	-230.1	-258.7	-266.7	-266.1	-280.2	-291.9
Public debt amortization	-19.2	-17.7	-21.2	-23.1	-29.8	-54.2
Repayment to the IMF	-5.0	-5.5	-3.9	-5.7	-5.5	-5.1
Change in official reserves	-43.0	-45.4	-36.0	-32.9	-28.1	-39.6
Arrears repayment
2. Total financing sources	221.3	261.0	264.1	275.1	302.9	347.5
Capital transfers	116.0	126.0	125.0	125.0	125.0	128.0
Foreign direct investment (net)	97.8	103.9	112.1	118.8	130.1	138.0
Portfolio investment (net)	4.0	4.0	4.3	4.7	5.0	5.4
Public sector debt financing	57.5	55.0	55.0	55.1	54.0	70.5
Other net capital inflows ¹	-54.1	-27.9	-32.3	-28.5	-11.2	5.6
Exceptional financing
Errors and Omissions	0.0	0.0	0.0	0.0	0.0	0.0
3. Total financing needs	76.0	66.3	63.7	52.6	40.7	43.2
Budget support (grants)	62.1	52.4	49.8	45.6	40.7	43.2
World Bank	30.0	20.0	20.0
European Union	25.2	25.5	22.8
African Development Bank	6.9	5.0	5.0
Other
IMF Disbursements	13.8	13.9	14.0	7.0
Residual financing need/Financing gap	0.0	0.0	0.0	0.0	0.0	0.0

Sources: The Gambian authorities; and IMF staff estimates and projections.

¹ Includes changes in commercial bank NFA and private trade financing.

Table 11. The Gambia: Financial Soundness Indicators for the Banking Sector, 2015–19

(End of period)

	2015	2016	2017	2018	2019
(Percent, unless otherwise indicated)					
Capital ratios					
Capital adequacy ratio	33.1	38.2	33.6	31.7	31.4
Regulatory capital ratio (i.e., T1+T2)	34.8	39.8	35.1	33.0	32.7
Primary capital ratio (i.e., T1)	31.4	35.9	31.9	30.3	30.1
Non-performing loans/Primary capital	7.9	9.8	6.8	3.4	5.8
Sectoral distribution of credit					
Agriculture and fishing	3.6	6.5	8.5	1.7	2.0
Manufacturing industries	3.4	0.7	0.7	0.4	1.2
Building and construction	8.5	9.9	13.7	19.7	27.3
Transport and communication	10.3	9.0	8.1	7.7	7.6
Commerce	39.4	31.2	31.1	31.2	22.9
Tourism	2.6	2.4	5.2	10.8	5.6
Financial Institutions and enterprise services	4.2	2.1	3.0	3.2	1.2
Other activities	27.9	38.1	29.6	25.3	32.2
Asset quality ratios					
Non-performing loan ratio	6.5	9.3	7.2	3.3	4.5
Aggregate provision level	82.2	79.1	99.1	100.2	73.4
Loan loss reserve ratio	4.6	6.8	6.6	2.9	2.5
Earnings and profitability					
Net income to average assets (ROA)	0.5	0.7	1.6	1.6	1.9
Net income to average equity (ROE)	3.5	4.2	11.0	11.3	15.4
Net interest margin	1.8	1.9	8.1	5.9	6.5
Non-interest income ratio	33.2	27.6	31.7	40.9	40.2
Liquidity ratios					
Liquid assets ratio	93.4	101.3	92.9	94.8	92.0
Dalasi liquid assets/dalasi deposits	88.4	97.5	89.0	93.5	94.7
Time deposits/total deposits	18.1	17.3	14.3	12.9	11.2

Source: Central Bank of The Gambia.

Table 12. The Gambia: Indicators of Capacity to Repay the Fund, 2019–25

	2019	2020	2021	2022	2023	2024	2025
	Act.			Projections			
Fund obligations based on existing credit							
Principal (millions of SDRs)	4.6	3.6	4.0	2.8	4.0	3.9	3.1
Charges and interest (millions of SDRs) ¹	0.1	0.2	0.2	0.2	0.2	0.2	0.2
Fund obligations, existing and prospective credit							
Principal (millions of SDRs)	4.6	3.6	4.0	2.8	4.0	3.9	3.6
Charges and interest (millions of SDRs) ¹	0.1	0.2	0.2	0.2	0.2	0.2	0.2
Total obligations, existing and prospective credit							
In millions of SDRs	4.6	3.8	4.2	3.0	4.3	4.1	3.8
In millions of US\$	6.6	5.3	5.8	4.2	5.9	5.7	5.4
In percent of Gross International Reserves	2.9	2.0	1.8	1.2	1.6	1.4	1.2
In percent of exports of goods and services	2.7	2.0	2.0	1.3	1.8	1.6	1.4
In percent of debt service ¹	17.0	21.3	26.4	15.5	20.6	16.3	8.8
In percent of GDP	0.4	0.3	0.3	0.2	0.2	0.2	0.2
In percent of quota	7.4	6.2	6.7	4.8	6.8	6.6	6.1
Outstanding Fund credit							
In millions of SDRs	26.1	32.5	38.5	45.7	46.7	42.8	39.2
In millions of US\$	36.9	44.9	53.3	63.6	65.2	60.0	55.1
In percent of Gross International Reserves	16.4	16.7	17.0	18.2	17.0	14.6	12.2
In percent of exports of goods and services	15.3	16.7	18.4	20.3	19.3	16.5	14.1
In percent of debt service ¹	95.9	179.9	243.3	234.8	226.4	170.5	90.0
In percent of GDP	2.1	2.3	2.5	2.8	2.7	2.3	1.9
In percent of quota	41.9	52.2	61.9	73.5	75.0	68.8	63.0
Net use of Fund credit (millions of SDRs)							
Disbursements	-4.6	6.4	6.0	7.2	1.0	-3.9	-3.6
Repayments and Repurchases	0.0	10.0	10.0	10.0	5.0	0.0	0.0
	4.6	3.6	4.0	2.8	4.0	3.9	3.6
Memorandum items:							
Nominal GDP (millions of US\$)	1,764	1,925	2,093	2,267	2,441	2,627	2,829
Exports of goods and services (millions of US\$) ²	241.9	268.8	290.0	312.9	337.7	362.4	389.8
Gross International Reserves (millions of US\$)	225.0	268.0	313.4	349.5	382.4	410.5	450.1
Debt service (millions of US\$) ¹	38.5	24.9	21.9	27.1	28.8	35.2	61.2
Quota (millions of SDRs)	62.2	62.2	62.2	62.2	62.2	62.2	62.2

Sources: IMF staff estimates and projections.

¹ On May 24, 2019 the IMF Executive Board approved a modified interest rate setting mechanism which effectively sets interest rates to zero on ECF and SCF through June 2021 and possibly longer. The Board also decided to extend zero interest rate on ESF till end June 2021 while interest rate on RCF was set to zero in July 2015. Based on these decisions and current projections of SDR rate, the following interest rates are assumed beyond June 2021: 0/0/0/0 percent per annum for the ECF, SCF, RCF and ESF, respectively. The Executive Board will review the interest rates on concessional lending by end-June 2021 and every two years thereafter.

² Excluding re-exports.

Table 13. The Gambia: Proposed Disbursements Under the ECF Arrangement, 2020–23

Availability	Disbursements		Condition for Disbursement ¹
	In millions of SDR	In percent of Quota	
March 23, 2020	5.000	8.039	Approval of the Arrangement.
September 15, 2020	5.000	8.039	Board completion of the first review based on observance of performance criteria for June 30, 2020.
March 15, 2021	5.000	8.039	Board completion of the second review based on observance of performance criteria for December 31, 2020.
September 15, 2021	5.000	8.039	Board completion of the third review based on observance of performance criteria for June 30, 2021.
March 15, 2022	5.000	8.039	Board completion of the fourth review based on observance of performance criteria for December 31, 2021.
September 15, 2022	5.000	8.039	Board completion of the fifth review based on observance of performance criteria for June 30, 2022.
March 15, 2023	5.000	8.039	Board completion of the sixth review based on observance of performance criteria for December 31, 2022.
Total Disbursements	35.000	56.3	

Source: IMF staff estimates.

¹ In addition to generally applicable conditions under the ECF Arrangement.

Annex I. Strengthening Governance and Tackling Corruption and Trafficking in Persons

The Gambian authorities are making appreciable progress in addressing governance deficits, taking measures to combat human trafficking, and developing an anti-corruption framework. Efforts are currently focused on five key areas: (i) documenting and acting upon past governance lapses and corruption; (ii) strengthening the legal and regulatory framework; (iii) improving PFM and procurement; (iv) enhancing revenue mobilization by reducing vulnerability to corruption; and (v) targeting prosecutions of the perpetrators of human trafficking. The Gambia will need specialized fiscal and legal expert support to consolidate the work on governance and anti-corruption framework under the ECF-supported program (see also Annex V).

I. Dealing with Past Governance Lapses

- The Government's White Paper, summarizing the findings of the Janneh Commission of Enquiry, was published in September 2019. The paper detailed the scale of stolen assets and illegally acquired proceeds by the former President and his close associates. The sale of domestic vehicles, land and property has raised 700 GMD million in 2019 and is expected to raise a further 300 million GMD in 2020 (1 percent of GDP in total). Recovery of foreign assets will take longer.
- The Truth, Reconciliation, Reparations Commission (TRRC) aims to provide an impartial historical record of abuses committed by the Jammeh regime over its 22 years in power. The authorities have provided an initial GMD 50 million seed funding for victim reparations from proceeds of the sale of stolen assets.
- A National Human Rights Commission (NHRC) was established in 2018 to investigate past complaints of human rights abuse and avoid a future repetition of the gross human rights violations. Civil society engagement with law enforcement, respect for the rights guaranteed by the constitution, such as the right to assembly, freedom of expression, and rule of law will be monitored by the NHRC.
- Key outcomes from the work of the commissions will focus on strengthening the capacity of the judiciary and the courts to accelerate the delivery of prosecutions and convictions. Further actions will be needed to accelerate the enforcement of court judgements.

II. Strengthening Legal and Regulatory Framework

- The Supreme Court declared several historically repressive legislations to be unconstitutional, including the 2013 Information and Communication Act, and the Seditious and Official Secrets Act. Legal reforms will tackle the threat of violence against women and will pursue more aggressively prosecutions of human traffickers. Several other transformative pieces of legislation have been placed before the National Assembly for approval such as the access to an information bill, a women's amendment of the discriminatory laws bill, a sexual offences bill, and a bill on mutual legal assistance in criminal matters.

- A draft Constitution is now published for comments including strengthening and clearly defining term limits of presidential powers and the President's ultimate accountability to the National Assembly. Written approval is required of any directives issued and the President is held personally liable for any losses (financial and non-financial). Secondary legislation is being strengthened to limit interference in areas of economic management.
- A draft Anti-Corruption bill includes proposals for the establishment of an Anti-Corruption Commission and has been submitted to the National Assembly in December 2019. The bill provides effective measures for the eradication, suppression and prevention of corruption and corrupt practices in both private and public life. All asset declarations by public officials will be submitted to the Anti-Corruption Commission and made public under the Access to Information bill. This adds to the provisions on asset and liability declarations for senior officials within the new Constitution. Political parties are also required to declare publicly their assets and revenues including the source of such funds.
- The current criminal code criminalizes bribery, corrupt practices related to procurement and extortion by public officials. The code is being extended to criminalize trading in influence and bribery in the private sector. The Gambia has been a party to the United Nations Convention Against Corruption since 2015 and changes to the criminal code will be aligned with it and with international best practices.
- The Gambia's commitment to international law has been strengthened, including honoring all judgment awards made against the previous administration by the ECOWAS Court.
- Efforts will need to be maintained to ensure the ambitious set of legal reforms are enacted by the National Assembly.

III. Establishing PFM and Procurement Processes

- The establishment of a single Treasury Single Account (TSA) and progressive closure of dormant government accounts is helping to strengthen budgetary control over revenue receipts and expenditure. PFM reforms more generally will improve transparency and accountability, and reduce the scope for corruption.
- The Banjul Rehabilitation Project (BRP) is now domestically financed from the budget. The Office of the President publicly acknowledged governance lapses and criticism of the procurement breaches of the project. Project execution for the BRP is monitored by an international engineering firm to ensure value for money.
- Implementation of the PIMA recommendations will strengthen GSRB and GPPA to ensure effective and efficient project appraisal, selection and approval including drastically reducing the use of executive waivers and single sourcing. The GPPA Act now limits the use of single sourcing to events resulting in a loss of life, loss of property or due to force majeure.
- New SOE and PPP laws aim at strengthening MoFEA powers on oversight to mitigate fiscal risks. A draft SOE law has been submitted to the National Assembly in October 2019 and received a provisional approval in January 2020, with the final approval pending the adoption of the new

constitution. The new PPP law, currently prepared, is urgently needed to frame relations with private partners in prospective large public investment projects.

- MoFEA will adopt a proposal to strengthen fiscal transparency and accountability through a new fiscal transparency law.
- Implementation of IFRS in public accounting, improved asset declarations and strengthening of the internal audit function including greater accountability to National Assembly on actions taken to prosecute corrupt public servants are underway. A new strengthened public service code of conduct has also now been put in place.
- Special audit reports of all SOEs are now complete and the sectoral reform work including around governance of SOEs is moving forward, led by the World Bank (Annex II). The arrear clearance strategy, including signed monthly payment plans, is in place.
- Draft performance contracts for SOEs establish clear operational independence including strengthened board governance of SOEs and improved oversight. The contracts also articulate key performance indicators to mitigate fiscal risks and call for budgetary resources to fulfil social objectives, and not from own resources.
- Further efforts will be needed to strengthen fiscal data reporting, such as enhancements to expenditure recording systems (EPICOR 10 and IFMIS upgrade) and improved classifications of fiscal transactions using GFSM 2014, in line with the Chart of Accounts.

IV. Revenue Mobilization and Reducing Scope for Corruption

- Strengthening integrity and functionality of ASYCUDA IT system to calculate and mitigate custom revenue foregone and corruption risk from: (i) weak controls at custom warehouses; (ii) inadequate physical examinations on exports; (iii) companies that are granted tax holidays; and (iv) customs officers overriding ASYCUDA intervention selections.
- Enhanced data monitoring of the revenues of large taxpayers, including with the use of sophisticated software to monitor the scale of operations of mobile telecom providers, has supported greater voluntary tax compliance.
- GRA has developed clear tax officer roles and responsibilities. Staff integrity now forms a key corporate objective of the latest GRA corporate strategic plan. Staff surveys and an integrity committee have been put in place to follow up and act on evidence of failings.
- The current tax exemptions policy will be reviewed, as it is complicated to administer by MoFEA and implement by GRA and remains vulnerable to corruption.
- The GRA will need to address the remaining backlog of weaknesses identified by the TADAT assessment including long-standing IT system enhancements, which will add to revenue transparency and accountability.

V. Trafficking in Persons

- The factors and circumstances of human trafficking in The Gambia are varied and complex, as its geography has made it a transit point for migrants en route to Europe and the United States. Furthermore, the vibrant tourism industry and the actions of a few poorly run religious schools acted as a magnet for economic migrants and exploiters of persons.
- The Gambia has adopted a zero-tolerance policy to trafficking in persons (TIP). Trafficking in persons and corruption are closely linked criminal activities—the lack of measures and actions to address corruption can lead to a growth in TIP.
- The National Agency Against Trafficking in Persons (NAATIP), supported by The Office of the President, is working on priority areas with relevant stakeholders (police, immigration, state intelligent services, courts and customs officials) building on the existing action plan to address the issues highlighted in the 2019 US Department of State TIP Report.
- The Gambian law provides a broad definition of coercion to include threats from non-physical, psychological or reputational harm. This provides greater scope by law enforcement agencies to target the perpetrators of TIP and the multiple ways that they use to coerce their victims.
- The authorities have assigned more investigators to NAATIP to fast track investigations and build criminal cases. The creation of NAATIP focal points at major border entry and exit points throughout the country will help to secure borders and facilitate identification of victims while securing arrests of traffickers.
- All TIP cases will be more extensively documented on a TIP database that enables easier linking to other related financial intelligence, customs, immigration and police data.
- Safety measures at the Bakoteh Shelter for victims have been improved, including tighter guarded security and erection of fencing. Additionally, social counselling is provided to address physical abuse and trauma suffered by victims.
- Greater capacity building efforts and training are being carried out by NAATIP for law enforcement entities and custom and border officials to improve identification of victims for protection and traffickers for arrests. A government hotline is also being set-up to facilitate public reporting.
- A draft cross-border cooperation agreement with Nigeria has been prepared and will be signed. This will add to the existing cooperation agreement with Senegal.
- Victim stigmatization and fear limit witness testimonies, reducing conviction rates. Investigations and prosecutions of cases are ongoing, but challenges remain in securing convictions. Increased resourcing for the investigative capabilities of NAATIP and its work on victim protection will be essential to pursue aggressively prosecutions and conviction of perpetrators, which remains the root cause of TIP.

VI. Next Steps

An IMF governance diagnostic mission is planned in 2020 ahead of the discussions for the 2020 Article IV consultation to help The Gambian authorities prepare for their own assessment of governance vulnerabilities and corruption risks and for the enactment of measures to reduce these vulnerabilities. The focus of the mission will be determined in consultation with the authorities, notably to identify the area of governance and corruption vulnerabilities that have not yet been subject to a diagnostic enquiry through other means and could be critical for strengthening The Gambia's performance under the ECF-supported program.

Annex II. Lending into Arrears to Official Bilateral Creditors

Staff assesses that the conditions are met for the Fund to provide financing to The Gambia in line with the policy on arrears to official bilateral creditors, notwithstanding its outstanding arrears to Venezuela. In particular:

- **Prompt financial support from the Fund is considered essential and the member is pursuing appropriate policies.** The Gambia is a long-standing fragile state, currently at high risk of debt distress caused by the heavy debt service payments on its external debt. The ECF arrangement will support the authorities' efforts to achieve debt sustainability, while catalyzing much needed international financial support. The Fund-supported program is expected to anchor macroeconomic stability and play a pivotal role in addressing this long-standing issue, building on the improvements in the medium-term debt profile as a result of debt service deferrals. The Gambia's policies in the context of the ECF-supported program covering 2020–23 will contribute markedly to growth and poverty reduction, notably by facilitating the creation of the much-needed fiscal space.
- **The authorities have been making good faith efforts to reach agreement with the creditor on a contribution consistent with the parameters of the Fund-supported program.**
 - *In terms of process,* The Gambian authorities have relayed to staff that they had contacted the Venezuelan authorities bilaterally through letters and technical meetings (most recently in October 2019 in Banjul), offering to engage in substantive dialogue and start a collaborative process on resolving the outstanding arrears (which arose due to international sanctions). Relevant information has been shared with them on a timely basis. The Gambian authorities are committed to continue making their good faith efforts until all the remaining arrears are resolved.
 - *The terms offered* by the Gambian authorities to Venezuela are in line with the financing and debt objectives of the Fund-supported program and imply a contribution that is not disproportionate relative to those sought from other creditors under the official sector involvement.
- **The decision to provide financing despite the arrears is not expected to have an undue negative effect on the Fund's ability to mobilize official financing packages in future cases.** In staff's view, providing financing to The Gambia despite the arrears is not expected to have an undue negative effect on the Fund's ability to mobilize future financing packages, given strong support from the international community in the context of the Fund-supported program for The Gambia and The Gambian authorities' efforts to resolve this in a timely manner.

Annex III. World Bank Sectoral SOE Reform Progress

SOEs	Reforms and Outcomes	Status
NAWEC	<p>Effective and financially viable NAWEC</p> <p>Governance</p> <ul style="list-style-type: none"> (i) Strengthening Board mandate (ii) Restructuring of management structure (iii) Performance-based incentive structure (iv) Streamlining of operations/business lines (v) Financial accounting and auditing <p>Economic and Financial Performance</p> <ul style="list-style-type: none"> (vi) Clearance of past arrears and debts (vii) Centralization of electricity payments of critical public facilities (viii) Reducing commercial losses (ix) Promoting energy efficiency (x) Transparent tariff setting 	<ul style="list-style-type: none"> (i) Board Charter approved by the Cabinet with few modifications. (ii) New organigram approved. Five of eight directors appointed, two being recruited. Board to approve on February 10. (iii) Performance contract, including KPIs, signed with MoFEA. (iv) 2019-25 Strategic Development Plan approved by the Board that stipulates a set of actions and targets for each business line. (v) 2017 accounts published. 2018 accounts under preparation. (vi) Cross-arrears MOU signed with MoFEA and arrears cleared; MOUs on restructured debt with other SOEs being signed, one pending. (vii) System established but with mixed results. Starting in 2020, a system is in place to prioritize electricity payments from monthly cash allocation to MDAs. (viii) 100% coverage on pre-paid meters for residential customers. Transition for non-critical public sector customers on-going. (ix) LED bulbs being used for street lights. (x) Tariff methodology guideline published.
GAMTEL and GAMCEL	<p>Divestiture of wholesale networks (ECOWAN and NBN). Divestiture or liquidation of retail networks of GAMTEL and GAMCEL.</p> <p>Wholesale networks</p> <ul style="list-style-type: none"> (i) Operationalization of an SPV (ii) Supporting transactions with private sector <p>Retail networks</p> <ul style="list-style-type: none"> (iii) Supporting transactions with private sector (iv) Supporting social plan 	<ul style="list-style-type: none"> (i) SPV endorsed by the Cabinet. TOR for a consultancy to help with the establishment developed by the Ministry of Information and Communication Infrastructure (MOICI). (ii) Transaction Advisor RFP issued in October 2019 for market test. Shortlisting ongoing. (iii) Transaction Advisor RFP issued in October 2019 for market test. Shortlisting ongoing. (iv) Plan developed and pre-validated.
Source: World Bank.		

Annex IV. Risk Assessment Matrix¹

Sources of risks	Relative Likelihood	Expected Impact if Realized	Policies to Mitigate Risks
Weaker than expected global growth	High	High	<ul style="list-style-type: none"> • Increase outreach to new tour operators. • Diversify the tourism base. • Promote regional trade and integration. • Promote private investment and diversify domestic production.
	Weaker than expected growth (U.S (low), Euro Area (high), and China (high), unpredictable protectionist actions imperil global trade and growth. Rising leverage, faltering confidence (U.S), delayed investment, weak foreign demand (Euro Area), trade tensions, and if coronavirus outbreak worsens (China), would undermine global growth	<ul style="list-style-type: none"> • Decline in Gambia's exports and tourism receipts. • Employment pressures abroad could reduce the inflow of remittance. • Failure of large leveraged corporates (see the case of Thomas Cook UK) 	
Large swings in energy prices	High	High	<ul style="list-style-type: none"> • Strengthen the fiscal oversight and reform of NAWEC. • Accelerate implementation of the national energy roadmap with World Bank support, including use of alternative energy production methods (on- and off grid).
	In the near term, uncertainty surrounding supply and demand shocks elevates price volatility, complicating economic management. Persistent and larger price swings including higher oil prices harm global growth...	<ul style="list-style-type: none"> • Gambia's dependence on HFO and sovereign guarantees pose a significant contingent liability risk. Increased use of ITFC facility could delay projects. • High production costs hurt growth. 	
Lower access to correspondent bank services	Medium	High	<ul style="list-style-type: none"> • Strengthen the AML/CFT framework. • Complete a survey of corresponding banking relationships (CBRs) withdrawals at the domestic banks.
	Significant curtailment of cross-border financial services in emerging and developing economies.	<ul style="list-style-type: none"> • Negative impact on payment services, bank profits, trade, remittances and investors' confidence. 	
Financial Instability	Low	High	<ul style="list-style-type: none"> • Monitor and mitigate debt risks with debt management strategy, enhance risk-focused supervision. • Implement FSSR recommendations including on crisis management
	Banks' high exposure to sovereign and SOE debt coupled with debt reprofiling and restructuring and declining interest rates may negatively affect banks.	<ul style="list-style-type: none"> • Reduced profitability and capital adequacy, negatively affecting financial intermediation. 	
Weak Fiscal Management	High	High	<ul style="list-style-type: none"> • Implement TA recommendations on PFM, strengthening cash management and budget execution. • Implement SOE and governance reforms.
	A looser fiscal policy without effective control of fiscal spending and lack of fiscal reforms. Fiscal shocks from SOEs.	<ul style="list-style-type: none"> • Increased domestic borrowing and renewed pressure on public debt sustainability, undermining growth. • Pressure on foreign reserves. • Crowding out of private credit. 	
Political Instability	Medium	High	<ul style="list-style-type: none"> • Give policy priority to socio-economic stability and development. • Involve CSOs in policy decisions. • Implement findings from governance commissions.
	Tribal politics and tensions among the coalition parties supporting President Barrow may lead to government ineffectiveness.	<ul style="list-style-type: none"> • Political uncertainty hurts market confidence and private investment, delays economic and policy reforms, and weakens institutions. 	
Natural disasters	Medium	High	<ul style="list-style-type: none"> • Strengthen food security and rural feeding programs. • Build up fiscal and reserve buffers. Increase economic resilience to droughts and natural disasters.
	Recurring cycles of erratic rainfall and droughts for five subsequent years.	<ul style="list-style-type: none"> • Domestic production, especially rain-fed agriculture. 	

¹ The Risk Assessment Matrix (RAM) shows events that could materially alter the baseline path (the scenario most likely to materialize in the view of IMF staff). The relative likelihood is the staff's subjective assessment of the risks surrounding the baseline scenario within the next three years. "Low" is meant to indicate a probability below 10 percent, "Medium" a probability between 10 percent and 30 percent, and "High" a probability of 30 percent or more. The RAM reflects staff views on the source of risks and overall level of concern as of the time of discussions with the authorities. Non-mutually exclusive risk may interact and materialized jointly.

Annex V. Capacity Development Strategy for FY2021

The Gambian authorities are requesting to transition from the 2019 SMP to a thirty-nine-month ECF arrangement. Technical assistance (TA) will play a critical supportive role, to achieve program quantitative targets and to advance the structural reform agenda. The capacity building program in The Gambia and the associated TA delivery are intertwined with program and surveillance priorities.

A. Overall Assessment of Capacity Development

1. As a fragile low-income country, The Gambia faces significant challenges in capacity and institution building, due to mismanagement and governance lapses under the previous administration. In the current circumstances, capacity building is being held back by absorption and implementation gaps, which are being exacerbated by limited domestic resources.

2. Nonetheless, there have been notable successes in implementing key structural benchmarks in public financial management (PFM), revenue mobilization, debt management, financial sector supervision, and SOE governance, drawing on capacity building efforts with technical assistance from the IMF, which contributed to a satisfactory performance track record under the 2019 SMP. Notable achievements include:

- Successful piloting of fiscal stress testing in 2017, which the authorities incorporated, starting in 2019, into the regular outputs, including the MTFE and budget planning.
- A comprehensive assessment of revenue administration (using TADAT) helped formulate a capacity development strategy at the Gambia Revenue Authority (GRA), delivering a stepwise increase in domestic revenue mobilization (DRM), including through stronger enforcement and compliance enhancements.
- Revenues from the telecom sector increased as a result of TA on telecom audits that helped improve compliance by uncovering the previously unreported tax liabilities (2018–19).
- A rebasing of the GDP series for 2004–18 (by the production approach, with 2013 as base year) was completed in April 2019. Since then, the Gambia Bureau of Statistics (GBoS) has worked toward rebasing of GDP by the expenditure approach; the estimates for 2004–18, which have been used in the production of the 2020–22 MTFE and 2020 Budget. The GBoS is also working on the next GDP rebasing (with 2018 as the new base year) and the development of quarterly national accounts, which require funding for an economic census.
- The introduction of new CPI expenditure weights based on the 2015/16 Integrated Household Survey and methodological improvements (and chain-linking of the old series with the new using a referenced base year, January 2020) will remove anomalies and biases in the CPI series.
- Multipronged support for the finance ministry to formulate an MTFE, debt and financial policies under the previous SMPs, including macroeconomic forecasts (2017–19).

- Initiation of reforms to enhance financial reporting (consistent with IFRS) and monitoring of SOEs (2017–19); including establishing an SOE database of financial and performance indicators.
- Progress on reforms for customs administration, including risk management during 2017–19.

3. TA implementation is being challenged by low implementation capacity and the lack of relevant and timely indicators, due to weak data management and analysis. Support and other incentives for senior officials and technical level staff who retain knowledge of work processes are insufficient to foster greater effort and retention of qualified staff, while high turnover among key staff constrains absorption capacity (see Section D below).

B. Forward-Looking Priorities

New TA Needs

4. Continued support from development partners will remain critical to further the structural reform agenda under the ECF-supported program over the period 2020–22. Longstanding capacity weaknesses will continue to be addressed with customized and tailored TA. Several new capacity development priorities will be an important part of the TA strategy for FY2021. Specifically:
- **Governance Diagnostic Mission.** To better assess The Gambia’s fragility in the areas of governance and vulnerability to corruption, a governance diagnostic mission will be conducted (Article IV surveillance). The mission will focus on a review of progress made and deficits in governance and vulnerability to corruption in PFM, Revenue Administration, public investment and procurement, Central Bank governance (oversight of financial institutions), SOEs, legal and regulatory framework, market regulation, AML/CFT and the impact of corruption on human trafficking. The report will help the authorities provide key recommendations to address gaps and better prioritize structural reforms in this area.
 - **Gender Budgeting.** TA support will be provided to strengthen and further the mainstreaming of gender by the newly created Ministry of Women’s Affairs, Children, and Social Welfare. The focus will be to structure revenues and expenditure that further gender equality to improve the efficiency and equity of the budget process.
 - **Climate Change.** The impact of climate change is macro-critical for The Gambia. Climate stress adds to fiscal risks and weakens the agricultural sector, worsening social and poverty indicators and adding to migration. The authorities have a mission in climate change impact assessment to support their efforts on risk mitigation and carbon reduction technologies, including the need for agricultural adaptation, and storm water and flood management.

Ongoing TA Needs

5. Capacity efforts will continue to support strengthening domestic revenue mobilization (tax register and tax exemptions), improving PFM, especially in the areas of cash management, budget execution and procurement, extending domestic debt maturities, implementing the recommendations from the recently completed Financial Sector Stability Review (FSSR) and

implementation of governance and transparency enhancements for government departments and agencies. These priorities will also require reforms to: (i) strengthen public accounting (IFRS), fiscal data reporting and forecasting, and public debt tracking and projection; (ii) improve the oversight of SOEs and subvented agencies; and (iii) upgrade the statistical capacity in national accounts, consumer prices (CPI), government finance (GFS) and BoP statistics critical for monitoring a future ECF arrangement. The proposed core strategy for IMF TA is as follows:

- Public investment and procurement will need to be improved by implementing the PIMA recommendations, with TA support from the IMF and the World Bank, to establish appropriate criteria for project selection and appraisal and ensure alignment with public investment needs articulated as part of National Development Plan (NDP) priorities and debt sustainability requirements. Work on improving the timeliness and accuracy of reconciled fiscal and Treasury cash forecasts is essential to ensure a closer match between budget execution and financing data, increase the control of fiscal floats and prevent the accumulation of expenditure arrears. Additional TA support is needed to rationalize subvented agencies, strengthen procurement functions and further the structural reform (e.g. tackling human trafficking) agenda. A resident PFM advisor at MoFEA is continuing to support the authorities in improving PFM work processes and help strengthen and consolidate TA provision and absorption. An updated PPP Fiscal Risk Assessment Model (PFRAM) may help provide record of progress and future prioritization needs in the PFM area.
- Revenue administration's tax and custom capacity will need to improve by implementing the post-TADAT roadmap, including cleaning up the taxpayer register and ledgers and improving the functionality of GAMTAXNET. The GRA is being supported by a resident advisor, to provide hands-on support and preserve the capacity building momentum. MoFEA will require support in drafting a new tax exemptions policy, leaning on best international practice in this area, to improve fairness and reduce the amount of foregone revenue.
- The quality of national accounts, CPI, BoP, monetary and government finance statistics (according to the framework of GFSM 2014 which is integrated in the chart of accounts) will be enhanced by: (i) strengthening administrative databases; (ii) assisting in the conduct, and enhancement of industrial production and household expenditure surveys, critical for updating the GDP and CPI data; and (iii) providing support in moving the national accounts from 2013 to 2018 as the base year.
- Financial sector TA will draw on the November 2019 FSSR to strengthen the Banking Law and in drafting new regulations for risk-based supervision and adopting a limited and proportionate move to relevant elements of Basel II/III. TA will be needed to strengthen stress testing capabilities, including a forward-looking assessment of risks. The absence of financial safety nets underscores the importance of capacity building in bank resolution to enable appropriate early intervention and prompt corrective action at the sign of stress. The need to enhance CBG's operational and forecasting ability calls for further TA on monetary operations, foreign exchange operations, and reserve management.

- Strengthening the CBG’s internal audit and accounting functions will draw on the findings and recommendations from the safeguards assessment to be conducted in April 2020.

C. For FY 2021, key priorities and objectives are as follows:

Priorities	Objectives
Tax administration	Expand tax base, strengthen enforcement, and reduce tax arrears.
Customs administration	Improve management, transparency and efficiency to deliver higher customs revenue.
Public Financial Management	Implementation of PIMA recommendations, Treasury cash management, including forecasting and reconciliation, of cash position strengthening budget execution and control, as well as accountability and transparency, improving debt management, SOE and subvented agencies oversight, conduct an updated PFRAM.
Statistics	Further improvements to the quality and timeliness of GDP, CPI, BoP, and GFS.
Dissemination of statistics	Strengthen the timeliness of data reporting under e-GDDS.
Banking supervision (leveraging FSSR) and liquidity forecasting	(i) Implement FSSR recommendations, including to improve the quality of data for banking supervision through more efficient electronic data reporting by banks; and (ii) advance the liquidity forecasting template with input from foreign exchange cashflow projections.
Governance	Strengthen public accountability, transparency, and vulnerability to corruption including bolstering CBG corporate governance.

D. Risk and Mitigation Measures

6. Key risks that could impact TA implementation stem from: (i) unavailability or loss of key staff due to absences and turnover; (ii) inability to hire competent technical staff due to weaker public-sector compensation packages; and (iii) lack of resources for IT system development. To mitigate these risks, staff are conscious of carefully prioritizing and designing the TA programs tailored to the local audience’s needs. Efforts will be needed by the authorities to ensure availability of key staff while simultaneously offering a more rigorous program of training for junior officers. The authorities are also seeking to follow up with development partners on funding for systems development which, if unfunded, could limit absorptive capacity and hinder implementation of TA. Recent efforts to improve funding for systems support are encouraging. For example, the authorities are working to improve the debt database with a new software, Meridian (supported by The Commonwealth Secretariat), and to implement a new Integrated Tax Management System (ITAS) using a Commercial Off-The Shelf (COTS) package (through World Bank support).

E. The Authorities' Views

7. The authorities agree with the thrust of the capacity development strategy. They consider that the strategy and objectives are appropriately formulated for the country and in line with the strategic priorities of the 2018–21 National Development Plan and its planned update.

The Gambia—Arrangement Under the Extended Credit Facility

Attached hereto is a letter dated March 3, 2020 (the “Letter”), with its attached Memorandum of Economic and Financial Policies (the “MEFP”) and Technical Memorandum of Understanding (the “TMU”), from the Minister of Finance and Economic Affairs and the Governor of the Central Bank of The Gambia, requesting from the International Monetary Fund, as Trustee of the Poverty Reduction and Growth Trust (the “Trustee”), a 39-month arrangement under the Extended Credit Facility (“ECF”), and setting forth:

- (a) the objectives and policies of the program that the authorities of The Gambia intend to pursue during the entire period of the arrangement;
- (b) the objectives, policies and measures that the authorities of The Gambia intend to pursue during the first year of the arrangement; and
- (c) understandings of The Gambia with the Trustee regarding review that will be made of progress in realizing the objectives of the program and of the policies and measures that the authorities of The Gambia will pursue during the second and third years of the arrangement.

1. To support these objectives and policies, the Trustee grants the requested 39-month arrangement in accordance with the following provisions, and subject to the provisions applying to assistance under the Poverty Reduction and Growth Trust (the “PRG Trust”) including in particular Section II, paragraph 1(b)(4) of the PRG Trust instrument annexed to Decision No. 8759-(87/176) ESAF, as amended.

- (a) For a period of 39 months from the date of approval of this arrangement, The Gambia will have the right to obtain disbursements from the Trustee in a total amount equivalent to SDR 35 million, subject to the availability of resources in the PRG Trust.
- (b) Disbursements under this arrangement shall not exceed the equivalent of SDR 15 million in the first twelve months, and the equivalent of SDR 25 million in the first twenty-four months.

2. During the period of the arrangement:

- (a) the first disbursement, in an amount equivalent to SDR 5 million, will be available upon approval of the arrangement, at the request of The Gambia;
- (b) the second disbursement, in an amount equivalent to SDR 5 million, will be available on or after September 15, 2020 at the request of The Gambia and subject to paragraphs 4 and 5 below;
- (c) the third disbursement, in an amount equivalent to SDR 5 million, will be available on or after March 15, 2021 at the request of The Gambia and subject to paragraphs 4 and 5 below;

3. The right of The Gambia to request further disbursements during the second and third years of this arrangement shall be subject to such phasing and conditions as shall be determined in the context of reviews under The Gambia's ECF arrangement.

4. The Gambia will not request the second and third disbursements under this arrangement specified in paragraphs 2(b) and 2(c) above, respectively:

(a) if the Managing Director of the Trustee finds that, with respect to the second disbursement, the data as of June 30, 2020, and with respect of the third disbursement, the data as of December 31, 2020, indicate that:

(i) the ceiling on the net domestic borrowing of the central government;

(ii) the ceiling on the stock of net domestic assets of the central bank; or

(iii) the floor on the stock of net usable international reserves of the central bank;

as set out in Table 2 of the MEFP and as further specified in the TMU was not observed; or

(b) until the Trustee has determined that, with respect to the second disbursement, the first program review, and with respect to the third disbursement, the second program review, have been completed.

5. The Gambia will not request a disbursement if at any time during the period of this arrangement:

(a) the ceiling on the contracting or guaranteeing of new nonconcessional external debt by the central government,

(b) the ceiling on the accumulation of new external payment arrears by the central government,

(c) the ceiling on the outstanding stock of external public debt with original maturity of one year or less, or

(d) the ceiling on the contracting or guaranteeing of new concessional external debt by the central government, as set out in Table 2 to the MEFP and as further specified in the TMU was not observed; or

(e) The Gambia:

(i) imposes or intensifies restrictions on the new making of payments and transfer for current international transactions; or

(ii) introduces or modifies multiple currency practices; or

(iii) concludes bilateral payments agreements that are inconsistent with Article VIII, or

- (iv) imposes or intensifies import restrictions for balance of payments reasons; or
- (f) until the Trustee has determined that, with regard to each disbursement, for so long as The Gambia has outstanding sovereign external arrears to official creditors, a financing assurances review has been completed.

6. When The Gambia is prevented from requesting disbursements under this arrangement because of paragraph 4 and 5 above, such disbursements may be made available only after consultation has taken place between the Trustee and The Gambia and understandings have been reached regarding the circumstances in which The Gambia may request the disbursements.

7. In accordance with the Letter, The Gambia will provide the Trustee with such information as the Trustee requests in connection with the progress of The Gambia in implementing the policies and reaching the objectives of the program supported by this arrangement.

8. During the period of this arrangement, The Gambia shall remain in close consultation with the Trustee. In accordance with the Letter, The Gambia shall consult with the Trustee on the adoption of any measures that may be appropriate at the initiative of the government or whenever the Managing Director of the Trustee requests such a consultation. Moreover, after the period of this arrangement and while The Gambia has outstanding financial obligations to the Trustee arising from loan disbursements under this arrangement, The Gambia will consult with the Trustee from time to time, at the initiative of the government or whenever the Managing Director of the Trustee requests consultation on The Gambia's economic and financial policies. These consultations may include correspondence and visits of officials of the Trustee to The Gambia or of representatives of The Gambia to the Trustee.



REPUBLIC OF THE GAMBIA

Appendix I. Letter of Intent

Banjul, The Gambia
March 3, 2020

Ms. Kristalina Georgieva
Managing Director
International Monetary Fund
Washington, D.C. 20431

Dear Madame Managing Director:

1. We thank the International Monetary Fund (IMF) for its continued support of our economic reform agenda through sound policy advice and valuable technical assistance under the Staff-Monitored Program (SMP). With The Gambia still in a fragile situation, the IMF's support has helped to catalyze much-needed financial assistance from the international community and remains pivotal for fostering macroeconomic stability and advancing the reform agenda.
2. The IMF's involvement has also been critical for addressing The Gambia's unsustainable public debt burden. The creditor roundtable held on the sidelines of the 2019 Spring Meetings helped mobilize our external creditors to provide the needed debt restructuring, which materialized in debt deferral agreements we signed in recent months with most of our bilateral and plurilateral creditors. As a result, The Gambia is no longer in debt distress and our public debt is now on a sustainable path.
3. Under the 2019 SMP, we reinstated fiscal discipline and demonstrated commitment to prudent monetary and financial management. This has boosted confidence in our economy and supported job creation. Our public financial management improved with the implementation of structural reforms to strengthen revenue administration, budget processes, cash management, and governance in state-owned enterprises. We have also been working to enhance bank supervision to support healthy financial intermediation and enable greater financial inclusion.
4. Nonetheless, much needs to be done to consolidate these gains, expand employment opportunities, and reduce poverty, as envisaged under our National Development Plan (2018–21). To help achieve these objectives, we are requesting a thirty-nine-month financial arrangement under the Extended Credit Facility (ECF) in the amount of SDR 35 million (56.3 percent of quota).
5. The attached Memorandum of Economic and Financial Policies (MEFP), which builds on our achievements under the 2019 SMP, describes our medium-term policy commitments to support our

request and sets out in detail the reform agenda for 2020. The pursuit of the ECF-supported program is expected to catalyze additional donor support that will help cover the cost of reforms and boost resources available for development and social spending.

6. The ECF-supported program will also help advance the reforms to strengthen governance in our economic and financial institutions. Our multipronged efforts in this area are already yielding results. The recently published draft Constitution seeks to define the limits of presidential powers and increase the accountability of public officials. The anti-corruption bill tabled before the National Assembly in December 2019 calls for the establishment of an Anti-Corruption Commission and work is underway to align the public procurement law with best practice and to strengthen The Gambian Public Procurement Authority. Creating safeguards against high-level corruption is also at the heart of the ongoing proceedings of the Truth, Reconciliation and Reparations Commission and other transitional justice initiatives. In this context, we look forward to working with the IMF staff on governance issues, to ensure further progress in this area, and welcome the opportunity to host an IMF diagnostic mission on governance later in the year.

7. The government believes that the policies and measures outlined in the attached MEFP are adequate to achieve the objectives of the ECF-supported program and we stand ready to take any additional measures that may become necessary for this purpose, maintain a close policy dialogue with the IMF, and seek technical assistance, as needed. We will consult with the IMF staff prior to any revisions to the policies contained therein, in accordance with the IMF's policies on such consultations. We will provide to the IMF staff, on a timely basis, all information required to monitor the program and will cooperate fully with the IMF to achieve our policy objectives. We also undertake neither to introduce or increase restrictions on payments and transfers related to current international transactions nor impose or intensify any import restrictions that would worsen The Gambia's protracted balance-of-payments difficulties.

8. We agree to the publication of this Letter of Intent and the attached MEFP and Technical Memorandum of Understanding (TMU), as well as the IMF staff report related to our request for an ECF Arrangement. We hereby authorize their publication and posting on the IMF website in accordance with IMF procedures.

Sincerely yours,

/s/

Mambury Njie

Minister of Finance and Economic Affairs

/s/

Bakary Jammeh

Governor, Central Bank of The Gambia

Attachments: I. Memorandum of Economic and Financial Policies (MEFP)

II. Technical Memorandum of Understanding (TMU)

Attachment I. Memorandum of Economic and Financial Policies

This memorandum sets out economic and financial policy commitments to support our request for a three-year arrangement under the Extended Credit Facility (ECF) of the International Monetary Fund (IMF). It summarizes our achievements under the Staff-Monitored Program (SMP) that was approved by the IMF Management in April 2019 and outlines our policies to consolidate these gains and advance the structural reform agenda for inclusive growth.

BACKGROUND

1. The Gambia is addressing its socio-economic challenges and laying a solid foundation for democracy, good governance, and respect for the rule of law and human rights. Key achievements toward these goals include: (i) the publication, in September 2019, of a White Paper endorsing the recommendations of the Janneh Commission for the recovery of assets stolen under former President Jammeh; (ii) the Constitutional Review Commission's (CRC's) submission to Cabinet in 2019 of a draft constitution which will be subjected to a country-wide referendum later in 2020; (iii) the operationalization of the Human Rights Commission; (iv) the submission of an anti-corruption bill to the National Assembly in December 2019; and (v) the achievement of important milestones by the Truth, Reconciliation and Reparation Commission (TRRC), including the drafting of a reparation regulation and the provision of seed capital of US\$1 million to the reparation fund.

2. We have made significant progress in tackling our public debt burden. Discussions on the restructuring of our external debt accelerated markedly after the April 2019 roundtable meeting with our external creditors on the sidelines of the IMF/World Bank (WB) Spring Meetings in Washington DC. Following the leadership of our Saudi partners, key multilateral creditors: Arab Bank for Economic Development in Africa (BADEA) and Islamic Development Bank (IsDB) and non-Paris club bilateral partners (India, Kuwait, and Abu-Dhabi) have provided debt service deferrals on maturities falling due within the next five years (in some cases, seven years), which will help achieve debt sustainability and secure financing assurances needed to support our request for an ECF arrangement. Consultations with OPEC Fund for International Development (OFID) and ECOWAS Bank for Investment and Development (EBID) are expected to be finalized in the coming months. The implementation of these deferrals will reduce debt service payments falling due over the next five years by nearly US\$158 million, of which about US\$25 million in 2020, and provide room for addressing the country's priority social and infrastructure needs. This, together with our commitment to prudent domestic borrowing and lengthening of the maturity structure, will reduce debt vulnerabilities and roll-over risks. In parallel, we are strengthening the financial conditions of state-owned enterprises (SOEs) through audits, arrears' clearance, enhanced oversight, and timely settlement of outstanding government liabilities (subsidies and utility bills) to reduce the buildup of contingent liabilities.

3. The Gambia has made significant progress under the SMP, and a transition to an ECF arrangement will help to consolidate gains achieved so far. Under the two SMPs covering 2017-19, we attained relative macroeconomic stability with GDP growth averaging 5.8 percent and inflation moderating to about 7 percent. Strengthened confidence in our economy helped support private sector expansion, with tourist arrivals reaching record levels in 2019, and enabled a considerable buildup of external buffers. These achievements were supported by improved revenue mobilization and public financial management. The ECF-supported program, with its focus on growth and poverty reduction, will help consolidate these achievements, while catalyzing additional budget support and other resources for implementing priority public investment projects, consistent with our National Development Plan (NDP), and further progress toward the Sustainable Development Goals (SDGs).

RECENT ECONOMIC DEVELOPMENTS

4. The Gambian economy continues to perform well. Real GDP growth attained an estimated 6.0 percent in 2019 (compared with 6.5 percent in 2018) despite adverse shocks. First, a delay in rainfall and its erratic pattern after a prolonged dry spell, resulted in a 10-percent decline in agricultural production, reducing the GDP growth by about 2 percentage points. Second, Thomas Cook-UK's bankruptcy in late September perturbed tourism activity at the dawn of the 2019/2020 season. While its impact has proven short-lived, some operators incurred significant costs to reposition their activity. Overall, however, tourism was the main driver of growth in 2019, which spawned a pick-up in tourism-related services and private construction. Other sources of growth included the opening of new opportunities for the mining of rutile, ilmenite and zircon and improvements in water and electricity supply, which supported the expansion in private economic activity and public investment.

5. Consumer price inflation (CPI) increased but the underlying trend indicates continued moderation of price increases. The CPI index increased by 7.3 percent in 2019 (compared with 6.5 percent in 2018) due to a one-time hike in postal charges in March 2019 and increases in food prices associated with the Ramadan and low food harvest. Nevertheless, the underlying trend appears benign and core inflation remains subdued. Furthermore, the accuracy of reported inflation will improve, thanks to recent methodological enhancements to bring the CPI in line with international standards and the introduction of a new CPI basket to better reflect current patterns of households' expenditure.

6. The external position has strengthened with record-high remittances and donor support. Despite a decline in the trade balance, reflecting a rapid expansion of imports, the overall balance of payments remained positive in 2019, owing to the disbursements of donor support and strong inflows of remittances and private capital, mostly for real estate investment. The combined volume of private FX inflows, including remittances, reached US\$318.5 million in 2019. The gross official reserves stood at US\$225 million (equivalent to 3.4 months of prospective imports) at end-2019. The dalasi remained relatively stable, depreciating by 3.2 percent in 2019 in nominal terms.

7. Strong revenue performance and budget support in the context of tightened expenditure control helped improve budget execution and achieve fiscal targets. The overall fiscal balance improved from a deficit of 6.2 percent of GDP in 2018 to 2.6 percent in 2019, mainly due to strong increases in budget support grants and domestic revenue. The underlying fiscal performance, as measured by the change in the domestic primary balance also improved (from a surplus of 0.6 percent of GDP in 2018 to a surplus of 1.8 percent of GDP in 2019).

- On the revenue side.** Domestic revenues increased by nearly 2 percent of GDP in 2019, exceeding the program projections by 1 percent of GDP. The increase in tax revenues contributed 0.9 percent of GDP and was by 0.1 percent of GDP stronger than expected. The bulk of the over-performance margin (0.9 percent of GDP) came from nontax sources, reflecting signature bonuses of US\$10 million from British Petroleum (BP) and US\$5.2 million from FAR Gambia Limited for rights to prospect for offshore oil. Customs revenue (including most of the value-added tax (VAT) receipts) benefited from a double-digit growth in imports. The increased revenue from direct taxes reflected good economic performance of large enterprises already in 2018. Strengthened audit capacity led to a significant improvement in the declarations and payments, especially by telecom companies. Similar exercises in other sectors also led to self-correcting measures by businesses, increasing declarations and payments of their tax liabilities. The recently conducted data matching exercise (covering customs importation data, supplies to government (IFMIS), tax returns, and taxpayer registration database) also helped identify importers that were not registered with the Tax Department. Finally, stepped-up enforcement efforts and legal actions contributed to a significant improvement in SOEs' tax compliance compared to 2018 as The Gambia Revenue Authority (GRA) signed binding agreements with several SOEs to recoup tax arrears.
- On the expenditure side.** Total expenditure was slightly lower than projected while accommodating (i) a 50-percent increase in basic salaries of civil servants across the board; (ii) expenses on transitional justice initiatives, namely, the CRC and the TRRC; and (iii) higher subsidies to the social sector (mainly health and education) and to the Gambia Groundnuts Company (GGC) to meet its payment obligations to the International Islamic Trade Finance Corporation (ITFC) facility. The growth in travel expenses, which had caused significant spending overruns in 2018, was kept to 2 percent in 2019. Steps were taken to rationalize expenditure on diplomatic missions. Capital spending was under-executed by 0.3 percent of GDP due to capacity issues that generally mar project implementation. Importantly, as financial discipline at National Water and Energy Company (NAWEC) strengthened, overruns on subsidies for electricity have been avoided.

8. Monetary policy remained appropriately neutral in the context of moderate inflation, strong foreign exchange inflows, and positive business sentiments. Core inflation (i.e., headline inflation excluding changes in the food, energy, and communication indices) moved in line with non-food inflation during 2019, and below the headline inflation. Reflecting this subdued inflation pressure and positive business sentiments during the year, the CBG reduced the policy rate by 50 basis points to 12.5 percent at its monetary policy committee (MPC) meeting at end-February 2019 and the rate on the standing lending facility (SLF) was reduced by the same margin to

13.5 percent. Subsequently, at the MPC meeting at end-August, the CBG increased the rate on the standing deposit facility (SDF) from 2 percent to 2.5 percent, to narrow the interest rate corridor and minimize interest rate volatility. Money supply growth remained strong at 27.1 percent, as re-monetization continued, and the money-to-GDP ratio increased from 42.9 percent at end-2018 to 48.4 percent at end-2019. In parallel, and supported by the robust economic activity, banks' credit to the private sector expanded by 35.8 percent (year-on-year) at end-2019.

9. The banking system remains well capitalized and liquid. Capital adequacy ratios of banks averaged 31.4 percent at end-2019, and bank profitability as measured by the return on equity (ROE) reached 15.4 percent. While low, non-performing loans (NPLs) increased from 3.3 percent of gross loans at end-2018 to 4.5 percent at end-2019, due to a localized deterioration in asset quality.

PERFORMANCE UNDER THE STAFF-MONITORED PROGRAM

10. All quantitative targets at end-2019 were met, with significant margins in some cases (Table 1). The zero ceiling on new external payment arrears was breached until November. The breach occurred in early 2019, when NAWEC (the payor) missed its debt service payments to Paris Club creditors due to cashflow problems and persisted until the government (guarantor) cleared the arrears and assumed the responsibility for servicing the remaining maturities. All other targets, including the ceilings on the central government's net domestic borrowing (NDB), were observed with comfortable margins. The margin under the NDB ceiling at end-2019 reached 940 million dalasi as tight expenditure control was exercised until the disbursement of budget support (€22 million) from the EU in late December. As a result, a treasury float of about 0.6 percent of GDP had to be cleared in early 2020 on account of the 2019 expenditures authorized after the EU funds had been received. The floor on the stock of net useable international reserves (NIR) was exceeded by US\$54 million, as the CBG took advantage of a strong demand for the dalasi to make regular purchases of foreign exchange at the interbank market. The indicative floor on poverty-reducing spending, which was missed at end-September, was also met.

11. All but two structural benchmarks under the SMP were met (Table 3). The two missed benchmarks related to (i) the validation of audited domestic arrears and preparation of a clearance strategy by end-June; and (ii) publication of the audited 2018 financial statements of the CBG by end-September. Both actions have subsequently been implemented.

- The CBG established a dedicated unit at the Banking Department to oversee developments in the payments system (April SB) and published its audited 2017 financial statements (May SB). The audited 2018 financial statements were published with a delay in November 2019 (September SB).
- The GRA implemented all three SBs under its purview, including two June SBs: verification and update of the large taxpayer registry using third party data and provision of TOR for a risk management committee; and a December SB on completion of two risk-based post-clearance audits in accordance with its manual.

- The Ministry of Finance and Economic Affairs (MoFEA) met 5 SBs in its domain: (i) the preparation of a report on debt relief anticipated/received from The Gambia's main creditors; (ii) the publication of quarterly debt bulletins; (iii) the reconciliation of the end-December 2018 debt data with external creditors (97 percent of claims were reconciled; the balances due to Libya and Taiwan Province of China are still subject to reconciliation); (iv) the institution of monthly cash management committee meetings and reporting to the IMF staff its deliberations; and (v) the revision of the Medium-Term Expenditure and Fiscal Framework (MTEFF) incorporating the rebased GDP series, while ensuring consistency with the Medium-Term Debt Strategy (MTDS) and the National Development Plan (NDP).
- The end-June governance-related benchmark (requiring validation of the audited domestic arrears, including to SOEs, and preparation of a strategy for their clearance) was missed. MoFEA has subsequently implemented this action in several steps. The audit of SOEs' arrears was finalized in August, the strategy for their clearance was articulated in September, and the audit of arrears of Ministries, Departments, and Agencies (MDAs) to suppliers was completed in November. The arrears to suppliers will be cleared in cash in 2020–21.

12. The SOE reform is advancing. Most notably, a draft SOE law was prepared to provide an overarching legal framework for the state enterprises, with the focus on addressing executive interference and improving efficiency in service delivery. The completion of this work will depend on the ratification of a new constitution, which is expected to include several changes regarding the governance of state-owned enterprises. Good progress was also achieved in: (i) the reform of the telecom sector, which is critical for securing budget support from the World Bank; and (ii) enhancing the financial management of NAWEC with the appointment of a new Board, the signing of the arrears clearance agreement to settle its trade credit obligations, and the adoption of a performance contract. MoFEA is also working with the National Audit Office on an action plan for seven fiscally most important SOEs to address the recommendations of the Ernst & Young (E&Y) audit report, which has been approved by Cabinet. E&Y has recently conducted the audit of the remaining seven SOEs. This phase includes the GGC, which is of systemic importance to agriculture and represents a drag on fiscal resources and economic growth.

13. The civil service reform agenda proved demanding in several respects. First, progress on reducing the expenses of the Ministry of Foreign Affairs has been slow. The government terminated the appointments of five embassy staff and delayed the closure of two embassies to mid-2020. The follow-up action plan for the redeployment of embassy staff is expected to be finalized in 2020. Second, MoFEA and the Personnel Management Office (PMO) are working on the financing arrangement for the implementation of the first phase of the civil service reform strategy. In the meantime, with TA support from the IMF, a study on wages, salaries and pensions of public servants have been conducted. Finally, the articulation of the vehicle policy is delayed. Several measures in this area have, nonetheless, been taken: (i) the use of V8 SUVs by managing directors of parastatals was banned; (ii) the provision of vehicle expenses was reduced by about 20 percent in the 2020 budget compared to the 2019 budget allocations; and (iii) the auction of more than 700 vehicles was conducted, yielding 27 million dalasi in 2019, and additional auctions are scheduled in 2020.

14. The implementation of the SMP encountered several challenges. In our efforts to improve the sanitation and traffic congestion in Banjul, we signed a dollar-denominated financing arrangement for the Banjul Rehabilitation Project (BRP). Also, given the emergency character of the work that needed to be initiated ahead of the rainy season, the procurement of the project did not follow the standard process. Subsequently, upon consultation with the IMF staff, we recognized that this arrangement, if implemented, would have been inconsistent with the zero ceiling on new non-concessional external debt contracted and that the single-sourcing of the contract put in question the governance aspects of the project and potentially compromised its value for money. To redress these problems, the financing arrangement was revisited to eliminate debt creation, with payments to be made in dalasi in step with project implementation, drawing on the allocations in the annual budgets and, to ensure value-for-money, the implementation of the project is being monitored by a consulting company (STUDI International), which was appointed based on its strong international reputation. Going forward, building on the experience of the BRP, arrangements are being made to improve project appraisal and selection, tighten the legal framework for public procurement, and increase the capacity of The Gambia Public Procurement Authority (GPPA). Monitoring the use of the trade credit facility of the ITFC by SOEs was another challenge. While pressures in this area were reduced relative to what was experienced in 2018, these exposures required heightened attention in early 2019 to clear the arrears of US\$6.9 million accrued by the GGC and to avoid their recurrence.

MACROECONOMIC POLICIES AND STRUCTURAL REFORMS

A. The National Development Plan

15. In 2017, The Gambia adopted the National Development Plan (NDP) as the reference framework for government action during 2018–21. The overarching goal of the NDP is to *“deliver good governance and accountability, social cohesion, national reconciliation, and a revitalized and transformed economy for the wellbeing of all Gambians.”* This goal is underpinned by eight strategic priorities and seven critical enablers. The strategic priorities comprise: (i) restoring good governance, respect for human rights and the rule of law, and empowering citizens through decentralization and local governance; (ii) stabilizing our economy, stimulating growth, and transforming the economy; (iii) modernizing our agriculture and fisheries for sustained economic growth, food and nutritional security, and poverty reduction; (iv) investing in our people through improved education and health services, and building a caring society; (v) building our infrastructure and restoring energy services to power our economy (energy, transport and public works); (vi) promoting an inclusive and culture-centered tourism for sustainable growth; (vii) reaping the demographic dividend through an empowered youth; and (viii) making the private sector the engine of growth, transformation, and job creation.

16. An Annual Progress Report (APR) of the NDP, which was initiated in 2019, presented a broadly satisfactory implementation record. At the donor conference in Brussels in 2018, around US\$1.5 billion was pledged in grants for budget support, and grants and loans for public investment and social projects. Already in 2018, about US\$180 million (nearly 12 percent of GDP) was disbursed

for NDP implementation. The APR found that out of the 61 outcomes of the NDP, 49 percent registered some progress (albeit constrained) as of end-2018, while 48 percent were on track and the remaining 3 percent showed limited or no progress. Regarding the eight strategic priorities, the report noted strong progress in tourism (100 percent on track), governance (50 percent), private sector (60 percent), and infrastructure and energy supply (60 percent). Two other strategic priorities made average progress: human capital (45 percent) and macro-economy (50 percent) while progress was slowest on agriculture and fisheries (33 percent), and youth empowerment (25 percent).

17. The ongoing work to refine the government strategic priorities is geared toward aligning them better with the SDGs. To this effect, the government is working on a new strategic vision for the Gambia. The experience with the Gambia Vision 2020, which was adopted around the turn of the millennium, is being assessed. The new vision will build on the progress made in governance, reducing the vulnerabilities to corruption, transitional justice, restoring the rule of law, commitment to civil liberties, and adherence to democratic norms. The revision will also aim to set a path towards achieving the SDGs, as fiscal space allows. This process will be followed in 2021 by the preparation of a new 5-year successor plan to the current NDP.

B. Macroeconomic Framework

18. The pursuit of sound economic policies in a favorable external environment underpins The Gambia's macroeconomic outlook. Economic growth is projected to reach 6.3 percent in 2020 and average about 5½ percent per year in 2020–25. Inflation is projected to moderate from an average of 7.1 percent in 2019 to the CBG's medium-term target of 5 percent by 2023 or earlier. Growth is expected to be driven by strong tourist arrivals, expansion in private sector activity, foreign exchange inflows, prudent economic policies, and increased foreign-financed public investment. Private sector growth will also be helped by improvements in the volume and reliability of water and electricity provision, and a strong growth in credit to private sector, enabled by reduction in government's recourse to domestic borrowing. The financial support for the Organization of Islamic Cooperation (OIC) summit, now slated for 2022, will help address the country's infrastructure gaps and form the basis for upgrading our tourism infrastructure. Among others, endowed with the recently inaugurated state of the art conference center funded by the People's Republic of China, The Gambia could become an international conference hub.

19. The reserves cover of imports is expected to expand further, premised on continued strong inflows of foreign exchange and budget support. Based on continued budget support from key international partners and strong foreign exchange inflows from private sources, we project gross official reserves to reach 4½ months of next year's imports by 2023. This reserve cover will help meet external debt service needs, which are expected to rise in 4–5 years as the debt service deferrals end. It will also help reduce The Gambia's vulnerability to exogenous shocks.

20. We are mindful of the risks to the outlook. External risks emanating from a slowdown of global demand, especially in Europe, could impact our tourism sector and remittances from abroad,

while increases in the international prices of oil could reignite inflation. Furthermore, given its fragile ecosystem, The Gambia is particularly exposed to the risks associated with climate change, which are already evident in the erratic rain pattern affecting agriculture. Domestic risks include the increased volatility of the political situation and implementation challenges in the course of difficult reforms, which could affect fiscal discipline. Upside risks stems from the synergies between public investment and private sector activity reflecting the expected implementation of several strategic projects in energy and infrastructure, a higher-than-anticipated development partners' support, and a confirmed discovery of economically viable oil reserves.

C. Fiscal Policy

The Medium-Term Fiscal Profile

21. Fiscal consolidation in the medium-term will ensure debt sustainability while protecting critical social and infrastructure needs. We aim to improve the primary balance by 1-1½ percent of GDP between 2019 and 2025, consistent with the need to accommodate the rising amortization of external debt starting 2025. This medium-term fiscal profile features a gradual increase in domestic revenue to around 15.2 percent of GDP by end-2025, supported by growing taxable activity and strengthened revenue administration. The bulk of the expected increase will come from taxes on income and corporate profits, and domestic taxes on goods and services, as our medium-term structural reforms support private sector activity and income growth. We are exploring refinements to our tax policy framework to increase its efficiency and equity. To this effect, MoFEA will create a Tax Advisory Committee in 2020 composed of professionals in tax, economic policy, and finance that will advise the government on tax related matters. Improved expenditure prioritization and public financial management will help contain the growth in spending on goods and services and transfers to subvented agencies, while compensation of employees is expected to grow in line with GDP. At the same time, we plan to reduce subsidies to SOEs, as they strengthen corporate governance and improve their financial balance sheets. The debt service deferrals will reduce external amortization by over 1 percent of GDP per year over the medium term, creating space for additional development and social spending including our flagship social initiatives. We will pay particular attention to the need to build buffers against fiscal shocks and increase the reliance on domestically financed capital expenditure to preserve debt sustainability.

22. This profile differs marginally from the 2020–22 MTEFF. The revisions, reflecting the 2019 outcome, implementation of debt deferrals and updates to the public investment program will inform the extension of the MTEFF to 2023, which will be used as a basis for the 2021 budget. The preparation of the 2019 APR of the NDP will start soon in sync with the revision of the MTEFF to cover 2021–23, as an integral part of our budget preparation process. In this regard, we have formed a dedicated team, supported by our EU-financed resident Public Financial Management (PFM) advisor, and plan to submit a draft MTEFF to Cabinet by July 2020. We will ensure a greater coordination with the production of the NDP progress report and the MTDS to ensure that the MTEFF reflects government priorities as laid down in the NDP and the need to meet the SDGs.

The 2020 Budget

23. To shore up fiscal sustainability, we will continue to strengthen our fiscal position through improved revenue administration informed by the Tax Administration and Diagnostic Tool (TADAT) action plan and strengthened prioritization of spending. The 2020 budget is anchored on stabilizing domestic public debt in nominal terms with the help of strong domestic revenue mobilization effort and grant support from international partners.

- **On the revenue side.** The revenue objectives in the 2020 budget of increasing tax revenue by 0.3 percent of GDP, places greater responsibility on the GRA to build on the performance registered in 2019, supported by tax policy measures and strengthened revenue administration. The 2020 budget features tax policy measures that are expected to yield about 0.2 percent of GDP, including from: (a) an increase in tobacco-related tax and excises; and (b) an increase in customs processing fees from 1–1.5 percent and its extension to formerly exempt imports. Further, an increase of the VAT threshold from 1 to 2 million dalasi is expected to yield additional revenue, but only over the medium term, as in 2020, the cash flows of all VAT contributors will be higher than the new threshold. Regarding administrative measures, the GRA will further strengthen its audit capacity through new hiring, staff training and coverage. We plan to perform joint staff (customs and domestic collectors) post-clearance audit of the operations of risky taxpayers and intensify our data matching processes to address tax evasion. Implementation of the reforms outlined in the GRA’s Fourth Corporate Strategic Plan 2020–24 are expected to help further maximize its revenue mobilization capacity.
- **Grants.** We are expecting **budget grant support**, equivalent of about 3 percent of GDP from the World Bank, the European Union (EU), and the African Development Bank (AfDB), and at least twice this amount in grant for **project support** from multiple sources for our public investment program.
- **On the spending side.** In addition to the pressures emanating from debt service and personnel emoluments, the 2020 budget has registered a 25 percent growth in subsidies and transfers to cater for additional teachers and medical personnel. More generally, we will review by end September 2020 the aims and objectives and funding models for subvented agencies with a view to rationalizing those with expired mandates or overlapping roles. In contrast, we have increased the subvention earmarked for the GRA in 2020, given the strong performance in 2019, with resource availability linked to their monthly collection performance. The Government also intends to finance the implementation of new social initiatives in 2020, comprising: (a) a pension fund and National Health Insurance Scheme that will initially cover civil servants; (b) an innovative developmental model referred to as the Program for Accelerated Community Development (PACD), to be implemented with the help of UNDP to improve access to basic social services for our rural population through the establishment of socio-economic infrastructures with the participation of local actors in the economic and social development of their localities; (c) the BRP, which is designed to address the deficiencies of the drainage, sewage and road infrastructure within our capital city; and (d) a social safety net project designed to avail cash transfers to the most vulnerable.

- **Domestic Financing.** The budget includes a provision for domestic amortization in the amount of 2.8 billion dalasi, this includes a rollover of three-year maturity bonds (totaling 2.2 billion dalasi) that are maturing in 2020 and 0.3 billion reflecting the settlement of arrears owed to suppliers and vendors by various MDAs. An updated domestic debt management strategy is being prepared to cover these needs (see ¶28). In addition, 0.5 billion dalasi will be drawn from the savings accumulated in the petroleum account in 2019 to finance the PACD and to provide seed capital for the pension fund and the health insurance scheme.

24. We recognize that strong commitment to our fiscal objectives in 2020 and beyond will help rebalance our economy and enhance fiscal and debt sustainability. In this regard, building on the early gains, we will (i) put public finances on a sustainable path, as outlined in the 2020 budget, consistent with debt sustainability, while raising additional revenue and allowing adequate spending on urgent infrastructure and poverty-reducing initiatives; (ii) leverage on the debt restructuring to lengthen domestic debt maturity and strengthen debt management through better project selection and debt negotiation processes; and (iii) address the governance issues of public agencies and institutions to strengthen accountability, fiscal transparency, oversight, and to tackle corruption to ensure a sound business environment for private sector development.

D. Public Debt

25. While debt deferrals alleviated debt service burden over the medium term, our overall public debt stock remains high and further efforts are needed to entrench the hard-won debt sustainability. Through a combination of strong growth, fiscal discipline, and prudent external borrowing, our public debt decreased from 87 percent of GDP at end-2018 to 81 percent of GDP at end-2019 and is projected to decrease to just below 76 percent of GDP by end-2020. Domestic public debt (carrying an average interest of about 7.5 percent) constituted about 45 percent of the overall public debt at end-2019. The reduction in debt service spending by about 2 percent of GDP between 2018 and 2020, on account of a drop in domestic interest rates and deferrals of external debt service (mostly amortization), will increase the resources available for development and social spending, key for growth and poverty reduction. It is understood however that debt service deferrals do not by themselves reduce the debt stock and our fiscal position needs to strengthen progressively over the medium term to accommodate steeper debt amortization payments after the period of debt deferrals comes to an end.

26. Moreover, our debt vulnerabilities remain high reflecting The Gambia's still fragile economic condition and exposure to a multitude of shocks. To address these vulnerabilities, we aim to bring the public debt-to-GDP ratio below 60 percent by 2024 through prudent external debt contracting policy and fiscal policy aimed at stabilizing the domestic public debt in nominal terms. The achievement of these goals will require strong fiscal discipline and sustained financial assistance from our development partners in the form of grants for budget support and for the public investment program to ensure that living standards of the population are improving as well.

27. To reach our debt reduction targets we will favor grant financing for public investment projects and refrain from contracting non-concessional debt. Securing grant financing for most of our public investment needs will be critical for achieving targeted reduction in debt ratios without compromising our development and social objectives. For high-priority projects, for which grant financing may not be available, we will seek external debt financing on the most concessional terms. To this effect, we commit not to contract loans with a grant element below 35 percent. Furthermore, we will limit the amount of such concessional external public debt contracted or guaranteed during 2020–23 to US\$190 million, of which no more than US\$60 million in 2020 (**PC, Table 2**). The frontloading of this borrowing plan reflects the pressing public investment needs associated with the preparation of the OIC summit. This plan is consistent with maintaining debt sustainability and avoiding a deterioration in the risk of debt distress rating, as demonstrated by the IMF/WB LIC DSA for The Gambia conducted in the context of this ECF request. The new Meridian debt recording system from the Commonwealth Secretariat will enable us to more effectively monitor the PC on concessional borrowing on a timely basis. To ensure a continued alignment of our debt contracting policy with the IMF program, we will consult with the IMF staff in writing before contracting or guaranteeing any external loans or undertaking any contingent liability arrangements such as Public-Private Partnerships (PPPs) and Power Purchase Agreements (PPAs).

28. We will update our medium-term debt management strategy (MTDS), with a focus on managing the rollover risk of the domestic debt portfolio. We will draft and publish a new MTDS (**SB Sep-2020**), envisaging an increased use of longer-maturity instruments to lengthen the maturity of the domestic debt stock and manage rollover risk. We will aim to replace shorter-maturity securities with longer maturity-bonds over time to address this risk. To support the implementation of the debt management strategy, we will publish annual borrowing plan for each year of the program. Moreover, we will use any additional budget support and excess revenue to reduce domestic debt and arrears in the medium term.

29. We will continue to improve our debt recording and debt reporting standards. We are in the process of migrating to a new debt management software, Meridian, with a technical support from the Commonwealth Secretariat, and will use the new software to produce the annual report on public debt at end-2019 (by end-March 2020) and the subsequent quarterly bulletins. This will improve the accuracy and timeliness of debt data in the Statement of Government Operations (SGO) and help ensure timely payments of external debt service. Strengthened debt recording and forecasting will help inform policy decisions and increase its transparency. To this end, we will continue to produce and publish on the MoFEA website quarterly reports on debt contracted, debt disbursed, debt outstanding, and debt service paid and projected. We are also strengthening the recording and reporting of project grants disbursements, which is essential for tracking public investment and making informed choices between grant- and debt-financed projects.

30. We recognize that strengthening project appraisal and selection is critical for debt sustainability and public investment efficiency. To this effect, the mandate of The Gambia Strategic Review Board (GSRB) is expanded to include the responsibility for appraising all public projects (domestic and foreign-financed), including all proposals for grant-financed projects and

projects involving direct government borrowing, government-guaranteed debt, and PPPs, prior to their approval at the Cabinet level. We have been refining project selection criteria drawing on the proposals included in Annex III of the PIMA report of July 2019 and further discussions with the PIMA follow-up mission. The GSRB will use these selection criteria in presenting its recommendation for Cabinet approval (**SB June 2020**). Independently of the technical criteria, we will ensure that projects selected for implementation are consistent with debt sustainability and the borrowing plan agreed with the IMF. As part of the benchmark, the GSRB will apply the selection criteria to a representative sample of ten existing domestic and foreign-financed projects to ensure preparedness ahead of the preparation of the 2021 budget. This exercise would also allow MoFEA to consolidate project data and create a comprehensive database of public investment projects, which would serve as a critical input for project appraisal and project selection decisions.

31. We are strengthening the control over the use of trade credit facilities contracted with the ITFC on behalf of SOEs. The large repayments to this short-term ITFC facility have the potential to undermine the relief obtained by the debt service deferral and pose a significant risk to debt sustainability. Thus, to progressively reduce the reliance on this facility, especially by GGC and NAWEC, we will include arrears to ITFC as part of the continuous PC on non-accumulation of new external arrears. Already, the agreement with ITFC signed in 2019 (US\$50 million) was lower than the one signed in 2018 (US\$70 million). We will avoid arrears to ITFC by closely monitoring the financial situation of the SOEs and timely provisions of subsidies. Regarding NAWEC, the servicing of obligations to ITFC improved in 2019 and we expect this discipline to continue. On GCC, we will continue to improve its management, while exploring alternative strategies for the groundnut sector, including different ways to assist farmers dependent on groundnut subsidies for income support, to eliminate the inefficiencies plaguing the current system.

32. To control contingent liabilities stemming from weak financial management of state-owned enterprises, we will strengthen the financial oversight of SOEs and improve their governance. Among the key government's intended reform actions includes:

- Clearly defining the commercial and socio-economic objective of each SOE;
- Establishing effective governance and leadership structure and limiting government interference;
- Establishing effective accounting functions and clear accounting policies;
- Ensuring SOEs have complete and exclusive control of their financial resources and bank accounts;
- Monitoring large procurement contracts and ensuring compliance with GPPA regulations; and
- Signing and enforcing of Performance Contracts and encouraging open comments on SOEs' performance.

The performance contract between NAWEC and the Government was signed in November 2019 after an extensive consultation and negotiations on the key performance indicators. The lessons learned will form the basis for the process to be undertaken with the remaining SOEs. As of end-January 2020, cross-arrear settlement agreements have been signed among seven SOEs and

the negotiations are ongoing between the remaining SOEs. These agreements will be monitored by MoFEA on a semi-annual basis.

33. We commit to providing a realistic financial support to SOEs and regular payment of government utility bills to avoid the build-up of cross arrears and ensure reliable and adequate provision of public services. The 2020 budget includes realistic level of subsidies for the two most fiscally significant SOEs: 350 million dalasi for GGC and 300 million dalasi for NAWEC, notably, to ensure timely service of their ITFC obligations. We have established a system to prioritize the payment of utilities by all MDAs from their monthly cash allocations and encourage the installation of prepaid meters by NAWEC to all other public entities. Fulfilling their obligations toward the utility companies will be an integral element in assessing the performance of SOEs and the subvented agencies.

E. Monetary Policy and Financial Sector

34. We will continue to strengthen the balance sheet and governance of the CBG to support effective use of its policy instruments. We are committed to meeting the requirements of the IMF's Safeguards Assessment Policy, including implementing the recommendations of the assessment update. In line with the previous IMF safeguards recommendations, the CBG completed an audit of its 2018 financial statements, which was jointly carried out by an international firm and a domestic audit firm. The results of the audit were published on the CBG website. We will continue to use the joint audit arrangement for the audit of the 2019 financial statements of the CBG. Pursuant to section 30 of 2018 CBG Act, the authorized share of capital of the Central Bank shall be one billion dalasi, to be fully subscribed and paid-up exclusively by the Government. Prior to this authorization, CBG authorized share capital was 100 million dalasi. To initiate the increase of the share capital, 180 million dalasi was debited from the Treasury in 2019. Discussions between MoFEA and CBG are underway on the modalities of constituting the full amount of CBG statutory capital. To safeguard the balance sheet of the CBG, we observe a zero ceiling on the CBG's credit to the government on non-market terms as an indicative target under the ECF (Table 2). In parallel, the CBG is reviewing its governance structure, including for the financial stability and macroprudential frameworks, which will also be informed by the recommendations of the IMF's 2019 Financial Sector Stability Review (FSSR).

35. We will maintain our monetary policy framework and use our interest rate-based instruments to ensure adequate liquidity and contain inflation pressures. In this context, we will continue to use short-term CBG bills, the monetary policy framework with quarterly MPC meetings, and will pursue efforts to narrow the interest rate corridor to guide the interbank market and dampen the interest rate volatility. In this context, the narrowing of the corridor will depend on liquidity conditions and inflation dynamics vis-à-vis the CBG's inflation target of 5 percent. We will use prudential measures, such as shifts in the required reserves ratio and its composition as necessary. To support our policy framework, we are enhancing our liquidity forecasting and management capabilities with technical support from AFRITAC West II. For this purpose, we have developed templates for a new approach to liquidity forecasting and monitoring and have identified

key stakeholders to provide specific and timely inputs to the process, comprising: (i) The Treasury (expenditure forecasts); (ii) GRA (revenue forecasts); (iii) Economic and Research Department of the CBG (projections of currency in circulation); (iv) Financial Supervision Department of the CBG (projections of banks' required reserves and cash holdings); and (v) Foreign Department of the CBG (foreign exchange interventions). To operationalize and monitor the monetary policy stance, we have set a ceiling on the stock of net domestic assets of the CBG as a quantitative performance criterion under the program (Table 2).

36. We remain committed to a flexible exchange rate regime and will continue to build up foreign exchange reserves to strengthen the resilience of our financial system. Accordingly, we will allow the exchange rate to adjust to market fundamentals and limit our intervention, in the form of FX purchases, to market demand and to support our liquidity management as needed. For this purpose, the Finance Department of the CBG has drawn up monthly external cashflow projections for 2020 to inform the CBG's FX intervention, which is also a critical input to our new liquidity forecasting regime (see above). In parallel, supported by our FX intervention policy premised on continued strong FX inflows from tourism and remittances, and inflows of grants and project loans, we will accumulate about US\$43 million in gross official reserves and will bring the stock of gross official reserves to US\$268 million (equivalent to 3.8 months of next year's imports) and their net useable component to US\$220 million (Tables 2).

37. Strengthening financial supervision remains a key element of our reform program. While the financial sector is dominated by banks, the nonbank financial institutions, including Social Security and Housing Finance Corporation (SSHFC) and insurance companies, are expanding their asset portfolios. Nevertheless, high bank-sovereign exposures, declining interest rates, and the prospects of rapid expansion of private sector credit (particularly for real estate activities) on the back of foreign exchange inflows entail risks that require vigilant supervision, including with regard to foreign exchange net open position and observance of the minimum capital requirement. Accordingly, the CBG is transitioning to a risk-based supervision with the support of IMF TA, to focus supervisory resources on highly risk-prone areas. The CBG will develop and publish a strategic plan addressing the key recommendations of the 2019 FSSR (**SB for June 2020**). The plan will seek to address the weaknesses identified by the FSSR in (i) the legal and regulatory framework for banking supervision; (ii) crisis preparedness and management mechanisms, including a deposit insurance scheme that balances fiscal and financial stability risks; and (iii) the supervision of non-bank financial institutions, including credit unions through their apex body, the National Association of Cooperative Credit Unions.

38. Financial inclusion is our top priority as a pivotal mechanism to spur inclusive growth. The CBG is championing the formulation and implementation of the National Financial Inclusion Strategy (NFIS) based on three pillars: (i) Financial Innovation; (ii) Consumer Protection and Empowerment; and (iii) Financial Education and Literacy. To increase its leadership capacity in this exercise, the Central Bank became a member of the financial inclusion global network, Alliance for Financial Inclusion that is providing, in collaboration with the United Nations Capital Development Fund and the World Bank, technical assistance to the CBG and key stakeholders in the public and

private sectors, and the civil society. A major focus to fast track financial inclusion will be the use of innovative technology including mobile and agency banking and fintech. These are viewed as areas with enormous potential to spur growth of the financial sector provided that the challenges to digitization of the payment systems and other financial technologies are adequately addressed. Mobile banking is estimated to harbor the greatest potential. The Gambia has one of the highest mobile penetration rates in the sub-region, with about 93 percent of household having access to mobile phone; however, only 2 percent of adults are registered mobile money users (The FinScope Gambia 2019). Key issues to tackle include regulatory inefficiencies, lack of interoperability, lack of consumer awareness and confidence, and high cost of services. In this context, we also recognize the need to enhance the oversight of the mobile money providers to prevent the build-up of risks.

F. Structural Reforms

Domestic Revenue Mobilization

39. Numerous reforms implemented by the GRA with the help of TADAT roadmap and technical assistance from the Fund are now bearing fruits. The building of tax audit capacity through the support of both the AfDB (procurement of IDEA software) and the training of staff in telecom audits by AFRITAC West II, resulted in significant increase in revenues from these businesses through self-correcting measures to avoid penalties. The increased competencies of GRA staff in data matching has also assisted in increasing the revenue contribution of existing taxpayers and in registering new taxpayers. The result of the risk-based post import clearances audit showed the potential revenue gain in pursuing them. With development partners' support we will continue to prioritize these efforts and build staff competencies in international taxation (including transfer pricing and taxation of the digital economy, all-inclusive tourism, and channel tv). The GRA has also requested support from development partners to build staff competencies in taxation of oil and gas sector, telecom audits and data analytics to support risk management and evidence-based compliance management. In this regard, the December 2018 IMF TA mission on petroleum taxation was timely and the follow-up mission in this area, planned for 2020, is welcome.

40. GRA will continue to strengthen tax and customs administration, to support our revenue mobilization efforts based on the TADAT recommendation and take bold actions to address tax exemptions. As part of the post TADAT reform plan, the Authority started the cleaning of the tax registry in the greater Banjul area, representing over 90 percent of domestic tax collection. This exercise has been completed for the Large Taxpayers Office, the Banjul, Kanifing, Brusubi, Tallingding, Wellingara and it will be completed by end-June for the remaining tax offices in the greater Banjul area (Serekunda and Brikama) (**SB for June 2020**) before proceeding to the provincial offices later in the year. The completion of the ongoing work to rehabilitate GAMTAXNET, with the core modules to be ready by end-March 2020, will allow GRA to launch the cleansing of tax payer ledger as recommended by the TA. To curb the increasing usage of tax exemptions amounting about 3 percent of GDP in 2019, MoFEA jointly with the GRA will by end-September 2019 submit to cabinet approval a new tax exemption policy (**SB September 2020**). As a next step, we are exploring the possibility of moving to a tax inclusive budgeting for projects, which needs to be agreed with

the donor community. Findings from the ongoing tax incidence analysis by the World Bank would partly inform this initiative. We intend to reactivate the tax exemption committee to enhance transparent application of the existing policy and conduct regular on-site verification of projects that are tax exempt to limit fraud.

41. GRA will improve services delivery and tax compliances by modernizing its system and making use of modern technology. In that regard, (i) with the World Bank support in the context of the Fiscal Management Development project, we will replace the GAMTAXNET, over the medium term, with an automated system on filing, payment, registration, tax arrears management and other business processes to be identified in a Business Process Reengineering exercise, train the audit staff to significantly increase efficiency in compliance management, and strengthen the institutional arrangements for effective tax policy at the MoFEA; (ii) the support from the AfDB and United Nations Conference on Trade and Development (UNCTAD) will help accelerate the migration from Automated System for Customs Data (ASYCUDA) from the ASYCUDA++ version to ASYCUDA World, a web based system that will bring greater transparency in customs valuation and reduce clearance time; (iii) we are also seeking support for the introduction of an Electronic Cargo Tracking System (ECTS) and a Road Cargo Tracking System (RCTS) for transit trade to enhance revenue mobilization by reducing port congestion and customs clearance time, boosting the reexport trade and ensuring the smooth transit of goods consistent with the ECOWAS protocol.

42. We will strengthen tax and non-tax revenue collection and ensure their timely sweeping to the TSA. To avoid leakages in revenue collection and move toward digitizing the economy, all government services and collections of revenue will take place through commercial banks or use of appropriate payment platforms once the TSA is fully effective. We have initiated discussion on a government payment platform that will enable electronic government revenue collections through online, mobile payments or direct bank wires. With the signed agreements to clear SOEs' tax arrears, we will ensure that SOEs regularly fulfill their tax obligations. We will also reinforce the control over SOEs and the government participation in private companies to optimize the payment of dividends. The sale of President Jammeh's assets and recovery of stolen assets identified in the White Paper of the Jannah Commission could be an important source of revenue. About 708 million dalasi has been recovered in 2018–19 and 360 million dalasi recovered in the first month of 2020, part of which will be used to compensate the victims of human right abuse in line with the TRRC recommendations. The government will reinforce the collection of the broadband fees (including the international gateway fee) with 30 percent of receipts to be allocated to the youth and sport development fund with the remainder servicing the debt accrued in the broadband construction.

Public Financial Management

43. We envisage further reforms in public financial management (PFM) to strengthen expenditure control and cash management and intend to expedite the audits of public

accounts. The following measures will be taken:

- The PMO will step up the implementation of the 2018–27 civil service reform strategy in collaboration with key stakeholders. Following the national staff audit and the launching of the capacity need assessment, the PMO will introduce an Electronic Records Management Strategy that is currently piloted in certain MDAs. It will also introduce a human resource management module on the IFMIS to ensure real time data availability on staff and an improvement on personnel management. These reforms including the introduction of new pension act as well as a pension directorate under PMO in 2020 will be informed by the recently completed IMF TA mission on wages and pensions.
- We have set up a Cash Management Committee (CMC) that is meeting on a monthly basis to determine Government’s cash allocation to MDAs. The CMC will be supported by the Liquidity Management Committee (LMC) that has representative from MDAs and the Cash Management Unit (CMU) under the AGD to optimize the government’s cash management and define its borrowing needs. The cash management mission was timely to strengthen the linkage between these committees and better align debt issuance calendar to the Treasury cash needs. We have developed with the input of all MDAs a monthly cashflow plan consistent with the 2020 budget (**SB for March 2020**). This plan will be extended to include the annual procurement plans for the 2021 budget. We have also prepared a government securities issuance calendar (for both rollovers and new financing) based on the annual financing requirement and we will announce for every quarter the updated weekly issuance calendar. We will continue to prepare and submit to the IMF the monthly minutes/reports of the CMC meetings based on the template provided by the TA expert. As a result, the coverage of the minutes will be expanded to include: (i) the weekly securities issuance calendar updates comparing actual with projections; (ii) the outcomes of the implementation of the cashflow plan in the previous month; (iii) the updates of the cashflow plan (including revenue and expenditure and financing flows); and (iv) the attainment of the quarterly net domestic borrowing targets.
- We will engage the National Assembly for the prompt review on the 2016 and 2017 audited accounts reports. We will work with the National Audit Office (NAO) to ensure that the 2018 accounts are audited by end-June. In the meantime, the Accountant General’s Department (AGD) will finalize the 2019 account for submission to the NAO by end-March 2020 (i.e., within the first quarter of the year, as required by the 2014 Public Finance Act). Responding to the adverse findings of the 2016 and 2017 audits, including on the treatment of arrears, the imprest accounts and payment vouchers, will be integral to the PFM reform agenda. We will publish on our website an annual statement (usually provided to the National Assembly) on MDA’s compliance with the internal audit recommendations (**SB for end-December 2020**).
- We will review the Public Finance Act with all its supporting documents (regulations and user guides) starting in 2020 to further enhance the PFM and foster transparency and accountability. With the expiration of the PFM reform plan this year, we intend to conduct a Public Expenditure and Financial Assessment (PEFA) with the support of development partners to set a basis for a new PFM reform strategy.

44. We will continue to enhance the efficiency of public spending through better control of subvented agencies. The rapid increase in the subsidies and transfers in the last two years call for swift actions to foster fiscal transparency and budget control, as well as realizing savings from subvented agencies. In this regard, we will streamline these agencies, harmonize the agencies' pay scale with the one for the government, and consider their realized end-year saving when deciding on subsidies allocations in the following budget. We will conduct and submit to cabinet by end-September 2020 a thorough assessment of all subvented agencies (**SB for September 2020**) to determine their relevance and financial viability. This assessment will include a review of: (i) the social function of these agencies; (ii) their staffing levels and conditions of employment; and (iii) their financial situation for 2017–19, including revenue, sources of income, expenditures, account payables, account receivables, and balances of bank accounts. We aim to identify those that can be self-financed and those that will still require subventions so long as they provide a key function that is not duplicated already by a Ministry or other public agencies. This assessment will also include a strategy and an action plan.

45. Additional efficiency gains will come from strengthened public procurement. We have submitted to Cabinet the revised GPPA Act (**prior action**) with proposals aiming to clarify and tighten the application of emergency procedures to be strictly limited to events involving loss of life, damage to property or force majeure. We will radically reduce the use of single-sourcing, eliminate this possibility for large-scale investment projects, and preclude the recourse to executive waivers to circumvent standard procurement rules. The technical capacity of GPPA will be strengthened with the support of development partners. To strengthen the application of procurement rules among MDAs, we will introduce the Electronic Government Procurement (E-GP) system in all MDAs and SOEs, and operationalize the Commodity Price Reference Index to foster transparency and competitiveness, reduce executive interference, and facilitate the detection of irregularities and corruption in public procurement.

Governance, Tackling Corruption and Trafficking in Persons

46. We are committed to fostering good governance, strengthening the Anti-Money Laundering and Combating the Financing of Terrorism (AML/CFT) framework and the audit function of MoFEA and across all public institutions.

- The government continues to make good progress in transitional justice to restore good governance and transparency in the Gambia. The human rights commission has been established and the government is making headway in recovering the assets stolen by the former regime as recommended by the Janneh Commission's report. The draft constitution released by the CRC includes measures that would strengthen good governance practices and reduce The Gambia's vulnerability to corruption by providing: greater legislative oversight, rebalancing the executive powers and ensuring the independence of the central bank, creating and empowering the anti-corruption commission and making a mandatory use of the asset declaration requirement for senior and elected officials. In line with our aspiration to foster good governance and combat corruption, an anti-corruption commission bill was submitted to the National Assembly in December 2019 along with several other bills including the access to

information bill, a sexual offences bill, women’s (amendment of discrimination laws) bill, and a bill on mutual legal assistance in criminal cases.

- On AML/CFT, we are strengthening the Financial Intelligence Unit (FIU) to implement the recommendation of 2019 workshops organized in collaboration with the Inter-Governmental Action Group against Money Laundering in West Africa (GIABA) for harmonizing the implementation of preventive measures on money laundering for all financial institutions and non-financial reporting entities. In 2019, the CBG and the FIU conducted on-site examinations of nine commercial banks to assess their AML/CFT frameworks and ensure that preventive measures such as internal controls, customer due diligence, record keeping, and transaction monitoring are efficiently implemented. This effort will continue to cover all financial institutions in 2020 and conduct the GIABA assessment.
- We are strengthening the audit function in all MDAs, SOEs, and other public entities for more efficiency and transparency in the use of public resources. In the case of SOEs, the strengthening of the audit capacity will build on the recommendations of special audits performed by E&Y at MoFEA’s request. With the technical support from the IMF, we are training the management of SOEs in the use of International Financial Reporting Standard (IFRS).
- The Gambia has adopted a zero-tolerance policy to trafficking in persons (TIP) backed by concrete actions to tackle it at source. The National Agency Against Trafficking in Persons (NAATIP) with support from the Office of The President, have already taken steps to address key weaknesses including: (i) the assigning of more investigators to NAATIP to fast track investigations; (ii) the creation of NAATIP focal points at major border entry and exit points throughout the country to secure borders against perpetrators of TIP; (iii) strengthening documentation of all TIP cases reported to support case evidence and move prosecutions to conviction; (iv) improving safety at the Bakoteh shelter for enhancing support for victims; (v) setting up a government hotline to facilitate the reporting of TIP cases. Resources will be needed to strengthen the investigative capabilities of NAATIP, strengthen victim protection and cross-border cooperation work on investigations, illicit financing and extradition to bring the criminal perpetrators of TIP to justice.

Business Climate

We recognize the role of the business climate in private sector growth and job creation and will take the necessary measures to facilitate doing business in The Gambia. The Gambia’s ranking on the World Bank’s Ease of Doing Business dropped from 145 in 2016 to 155 in 2019. We are stepping up efforts to improve our ranking, including by:

- The setting up of a Business Incubation Center to build capacity in entrepreneurship and leadership skills under the auspices of the Ministry of Trade and Regional Integration, the Gambia Investment and Export Promotion Agency (GIEPA), and the Chamber of Commerce.
- Improvements to the legal framework for private sector development, the preparation of a PPP Law to be sent to the National Assembly in 2020. The urgency of this measure is underscored by the situation of our Port, whose development is vital for the future of our economy and

revenue mobilization. With the support of the Legal Facility of the AfDB we are recruiting a consultant firm to identify a strategic PPP partner for the Gambia Port Authority, to expand and modernize port capacity. Since late 2019, the port congestion is delaying docking of vessels by up to 6 days, leading to additional cost. As a result, shipping companies started charging about US\$300 additional fees per container coming to The Gambia, which severely affects the Port's competitiveness. In the meantime, the introduction of the cargo tracking systems, and the road cargo tracking are expected to improve efficiency and boost re-exports, which will strengthen the attractiveness of the port.

- Efforts to strengthen energy supply and modernize the public service delivery, including the liberalization of telecom sector and the modernization of the Banjul airport. The launching of the 20 MW Brikama power plant in 2020 will increase electricity supply. The extension of the national grid and its connection to regional grids will offer regional energy trade opportunities and improve access to more affordable and reliable energy supply sources. The international voice gateway has been liberalized and licenses have been granted to private telecom operators. Work is underway to attract private partners for the wholesale broadband network (GNBN), as well as its parent company GAMTEL with its mobile subsidiary GAMCEL. The ongoing renovation of the Banjul airport will make travel to Banjul less expensive and more convenient, which will facilitate tourism.
- Modernization of the budget execution, the procurement and tax payment systems notably the upgrade of IFMIS, GAMTAXNET, and ASYCUDA to enhance transparency and competition and level the playing field for the private sector dealings with the public sector.
- Implementation of regional and continental trade initiatives. Ongoing efforts with Senegal, sole border country and main trading partner, ensure that non-trade barriers are eliminated and access to other ECOWAS countries are facilitated. This deeper regional integration, in the context of The Gambia's ratification of the Africa Continental Free Trade Agreement (AfCFTA), will allow our Port to reap full benefit of the new Senegambia bridge and its strategic location in the region. We are working with United Nations Department of Economic and Social Affairs (UNDESA) to provide support to MSMEs in harnessing the benefit of the AfCFTA. With the support of development partners, we will carry out an assessment of the economic potential of the Senegambia bridge, ways to strengthen the position of The Gambia as a trade and tourism hub and expanding the role of special economic zones.
- Facilitation of mining. With ECOWAS support we will align our mining legal framework to the recently adopted ECOWAS Model Mining and Mineral Development Act (EMMDA).

Social Spending, Poverty Reduction, and Climate Change

47. We continue to attach high priority to social spending and will maintain adequate poverty-reducing spending under the program. Our efforts to reduce extreme poverty as expressed in the NDP and our commitment to meet the SDGs will require programs and policies geared toward the most vulnerable population in terms of access to employment, quality health services, and good education. We increased poverty-reducing spending from 4 billion dalasi in 2018 to 5.3 billion dalasi in 2019 and plan to increase it to 5.6 billion dalasi in 2020. This spending will be

subject to a floor for poverty-reducing expenditure as an indicative target under the program (Table 2). Other poverty-reducing outlays not covered in this category include subsidies to NAWEC (to support electricity supply in remote areas), and crop financing and fertilizer subsidy to GGC. In addition, we have incorporated into the 2020 budget the following social programs financed with the savings from the debt service deferrals and savings accumulated in the petroleum fund:

- The PACD to be implemented by the UNDP to accelerate rural infrastructure development;
- The setup of a universal health insurance scheme, to ensure equitable access to health services; and
- A pension fund for civil servants.

To improve the targeting and the tracking of pro-poor spending, we will collaborate with the Office of the Vice-President on the implementation of programs targeting the most vulnerable, including the beneficiaries of the World Bank Social Safety Net Project.

48. Women’s issues and matters concerning children and the youth are being given prominence. We established a Ministry of Women’s Affairs, Children and Social Welfare with a mandate to promote gender-focused social equality and protect the vulnerable. To foster gender equality, we have established with EU support a Women Entrepreneurship Fund to provide a platform for productive, sustainable, and inclusive economic growth for women entrepreneurs, especially in rural areas. Going forward, we will progressively incorporate aspects of gender budgeting in our annual budgets with guidance and TA from the IMF. Further, our efforts focus on supporting youth entrepreneurship and skills development to reduce youth unemployment and curb illegal migration. Meanwhile, we continue to support the reintegration of returnees with the ongoing support of the International Organization for Migration (IOM) and the EU.

49. Adaptation to, and mitigation of, the impact of climate change represent macro-critical priorities of the government. In the past 50 years, the amount of precipitation has dwindled, and the duration and frequency of extreme weather events such as droughts and floods have become more common. Furthermore, our low topography, combined with a high dependence on rain-fed agriculture and inadequate drainage and storm water management system in the context of rapid urbanization, places The Gambia among the countries most vulnerable to climate change. The need for action is therefore urgent. To this end, The Gambia banned the use of plastic bags and in the recent conference on climate change subscribed, as one of the only two countries in the world, to limit temperature increases below 1.5 degrees Celsius by the end of the 21st Century. Our aim will be to build on the Renewable Energy Law, and further increase budgetary funding for renewable infrastructure, and research and development. To deliver on our commitment, support from our development partners will be needed to strengthen our production of renewable energy beyond what is currently expected to come on stream in 2021 (with the opening of a solar photovoltaic plant, with the capacity of 20 MW with 10 MW storage capacity, that is being built with support from the World Bank. One such initiative, with the support from EU and the European Investment Bank (EIB), is to equip 1100 schools, hospitals, and health centers across the country with

solar panels. We will also be requiring donor support to restore 10,000 hectares of forests, mangroves, and the savanna belt.

Data Quality and Dissemination

50. We are working to improve the timeliness and consistency of data reporting to facilitate program monitoring. To support our efforts in this direction, we will strengthen and expand the role of the program monitoring committee, whose members comprise the GRA, the AGD and key directorates in MoFEA, CBG and the Gambia Bureau of Statistics (GBoS). The committee will hold meetings in the last week of each month to (i) reconcile the SGO of the previous month with its source data and CBG data on NDB to avoid discrepancies and strengthen the credibility of the SGO; and (ii) ensure timely reporting of data for program monitoring, consistent with the timelines specified in Table 2 of the attached TMU. Drawing on recent and ongoing IMF TA, we will pursue improvements to the national accounts and price data; fiscal, debt, and monetary statistics; and financial soundness indicators as follows:

- **National accounts and price data.** With TA support of AFRITAC West II we have published (for the first time) GDP expenditure estimates for 2004–18. This exercise confirmed close comparability with the GDP by production estimates. GBoS will need to secure funding to undertake the rebasing of the national accounts with 2018 as the new base year and to support an economic census to produce quarterly GDP data. An update of the CPI expenditure weights and item basket—currently based on 2003/04 expenditures—to 2015/16 has recently been completed with the help of IMF’s Statistic Department (STA) experts. The updated index will include an enhanced aggregation and price relative methodology in line with international standards and should better account for the geographic distribution of expenditures across urban and rural households. This new index and the current series will be spliced on the 2019 data to provide a continuous series so that the full effect of the introduction of the new series would be reflected in the inflation data for 2020.
- **Fiscal and debt statistics.** Aid Coordination and the Directorate of Loan and Debt Management (DLDM) at MoFEA will expand information in the debt bulletin and will follow-up regularly with donors to ensure accurate and timely provision of data on disbursements (grants and loans) and debt service payments. We will continue to audit budget execution of all government spending agencies annually (by mid-year), including to take stock of their arrears to suppliers and ensure adequate allocations in the ensuing budget for their clearance. The AGD will prepare and communicate to the IMF at the end of each month the stock of floats (authorized expenditures for which payments are yet to be processed), to help better reconcile cash and budgetary operations and reduce statistical discrepancies.
- **Monetary statistics and financial soundness indicators.** The IMF 2019 FSSR in The Gambia identified gaps in the quality and management of financial sector data, including in key financial soundness indicators. The CBG will work with subsequent TA programs, including with the AFRITAC West II, to address these shortcomings and strengthen financial sector risk monitoring and supervision.

G. Program Monitoring

51. The government will take all measures needed to meet quantitative targets and observe structural benchmarks under the program (Tables 2 and 4). The program will be subject to semiannual reviews and performance criteria, indicative targets and structural benchmarks as set out in Tables 2 and 4 of this Memorandum and defined in the attached Technical Memorandum of Understanding (which also sets out the requirements for data reporting to IMF staff). We expect the first program review, which will be based on end-June 2020 targets and benchmarks, to be completed on or after September 15, 2020, and the second review will be based on end-December 2020 targets and is expected to be completed on or after March 15, 2021.

Table 1. The Gambia: Quantitative Targets for 2019
(Stocks; unless otherwise indicated)

	2018				2019										
	Dec.	April			June			Sept.				Dec.			
	Prel.	Prog.	Actual	Status	Prog.	Actual	Status	Prog.	Adj.	Actual	Status	Prog.	Adj.	Prel.	Status
Indicative quantitative targets															
1. Ceiling on net domestic borrowing of the central government (cumulative flows from the beginning of the calendar year, GMD millions) ¹	2,623	500	-243.2	Met	1,000	518	Met	500	1,500	1,090	Met	1,750	2,000	1,063	Met
2. Ceiling on the stock of net domestic assets of the central bank (including RCF onlending, GMD millions, TMU exchange rates)	7,335	7,297	6,302	Met	7,336	6,495	Met	6,486	...	5,847	Met	7,235	...	5,696	Met
3. Floor on the stock of net usable international reserves of the central bank (US\$ millions, TMU exchange rates) ^{2,3}	124	130	156	Met	120	157	Met	140	120	168	Met	140	135	189	Met
4. Ceiling on new external payments arrears of the central government (US\$ millions) ⁴	...	0	1.0	Not Met	0	1.0	Not Met	0	...	1.9	Not Met	0	...	0	Not Met
5. Ceiling on new nonconcessional external debt contracted or guaranteed by the central government (US\$ millions) ⁴	0	0	0	Met	0	0	Met	0	...	0	Met	0	...	0	Met
6. Ceiling on the outstanding stock of external public debt with original maturity of one year or less (US\$ millions) ⁴	0	0	0	Met	0	0	Met	0	...	0	Met	0	...	0	Met
7. Monthly ceiling on central bank credit to the central government at non-market terms (GMD millions) ⁵	0	0	0	Met	0	0	Met	0	...	0	Met	0	...	0	Met
8. Floor on poverty-reducing expenditures (cumulative flows from the beginning of the calendar year, GMD millions)	4,085	1,000	1,264	Met	2,000	2,535	Met	4,000	...	3,678	Not Met	5,000	...	5,267	Met
<i>Memorandum Items:</i>															
Budget Support (cumulative flows from the beginning of the calendar year, GMD millions)	815	1,420	1,420		1,420	1,420	...	3,038	...	1,420		3,038	...	2,788	
Base Money (GMD millions)	11,849	12,807	12,711		12,625	13,169	...	12,502	...	13,042		12,960	...	13,888	
Nominal Exchange Rate (GMD/US\$)	49.48	49.48	49.28		49.48	49.80	...	49.48	...	50.28		49.48	...	51.10	

¹ The proposed targets to be adjusted by the dalasi equivalent of the excess/shortfall of external budget support grants, subject to the limits specified in TMU 12.

² The proposed targets to be adjusted by the US dollar equivalent of the excess/shortfall of external budget support grants, subject to limits in TMU 19.

³ Measured at the GMD/US dollar exchange rate and cross rates at December 31, 2018.

⁴ Monitored on a continuous basis. External arrears to Paris Club creditors of US\$2.9 million were cleared in November 2019. This included the clearance of US\$1.9 million in arrears accrued in 2020 and about US\$1 million of pre-existing arrears. There were no external arrears at end-2019.

⁵ The zero ceiling applies to all outstanding credit (for example, overdrafts and advances) at non market terms as of the end of each quarter, excluding the RCF onlending and the 30-year bond held by the CBG.

Table 2. The Gambia: Proposed Quantitative Performance Criteria and Indicative Targets, 2020
(Cumulative from beginning of the calendar year to end of month indicated; local currency millions, unless otherwise indicated)

	2019	2020			
	Dec. Prel.	March	June Program	Sept.	Dec.
Performance criteria ¹					
1. Net domestic borrowing of the central government (ceiling)	1,063	1,650	550	750	500
2. Stock of net domestic assets of the central bank (ceiling)	5,696	6,843	5,593	5,615	5,672
3. Stock of net usable international reserves of the central bank (floor, US\$ million)	189	170	195	200	220
4. New external payments arrears of the central government (ceiling, US\$ million) ²	...	0.0	0.0	0.0	0.0
5. New nonconcessional external debt contracted or guaranteed by central government (ceiling, US\$ million) ²	0.0	0.0	0.0	0.0	0.0
6. Outstanding stock of external public debt with original maturity of one year or less (ceiling, US\$ million) ²	0.0	0.0	0.0	0.0	0.0
7. New concessional external debt contracted or guaranteed by central government (annual ceiling, US\$ million) ²	...	60.0	60.0	60.0	60.0
Indicative targets					
8. Total domestic tax revenue (floor)	9,986	2,500	5,500	8,250	11,000
9. Monthly ceiling on central bank credit to the central government at non-market terms (GMD millions) ³	0.0	0.0	0.0	0.0	0.0
10. Poverty-reducing expenditure (floor)	5,267	1,300	2,700	4,000	5,600
<i>Memorandum Items:</i>					
Budget Support (grants, US\$ millions)	54.6	0	40.0	46.9	62.1
Base Money (stock, GMD millions)	13,888	15,500	14,962	15,193	15,755
Nominal Exchange Rate (GMD/US\$)	51.10	51.10	51.10	51.10	51.10
ECF disbursements (SDR millions, flow) ⁴	...	5.0	5.0

¹ The performance criteria, indicative targets, and relevant adjusters are defined in the Technical Memorandum of Understanding (TMU). June and December 2020 are the test dates for the first and the second reviews, respectively. Targets for end-March and end-September are indicative, except for continuous targets.

² These apply on a continuous basis, including beyond end-December 2020.

³ The zero ceiling applies to all outstanding credit (for example, overdrafts and advances) at non-market terms as of the end of each quarter, excluding the RCF onlending and the 30-year bond held by the CBG.

⁴ First disbursement of SDR 5.0 million (8.0 percent of quota) is proposed on Executive Board approval of the ECF arrangement.

Table 3. The Gambia: Structural Benchmarks, 2019

Measures	Macro Rationale	Timing	Status
Prior actions			
Appoint an international audit firm to conduct jointly with a local firm an audit of the 2018 financial statements of the CBG.	To foster transparency and strengthen the financial governance of the CBG	Prior to submission of SMP program to IMF Management.	Met
Sign letters of engagement with financial and legal advisors that will assist in discussions with creditors on debt relief.	Debt relief is critical for achieving sustainability. Advisors are needed to coordinate the process and ensure it proceeds on a sound legal basis.	Prior to submission of SMP program to IMF Management.	Met
Establish end-December 2017 external debt data reconciled with external creditors, indicating exceptions.	Reliable and complete information on end-year debt stocks at end-2017.	Prior to submission of SMP program to IMF Management.	Met
Revenue mobilization (GRA)			
Verify and update all large taxpayer data on the tax registry using appropriate 3 rd party data and analysis and results from the data cleansing project	Large taxpayers contribute 80 percent of tax revenue.	End-June 2019	Met
Provide terms of reference for a risk management committee within the Gambia Revenue Authority (GRA).	Enhance strategic support for the risk-based approach to embed a risk-based approach to all GRA operations.	End-June 2019	Met
Conduct two risk-based post-clearance audits by customs on large high-risk businesses in accordance with the GRA post-clearance audits (PCA) manual.	Enhance customs revenue mobilization through improvement in compliance by targeting high-risk entities.	End-December 2019	Met
Public financial management (MoFEA)			
Institute monthly cash management committee meetings and report to IMF staff its deliberations and actions, to ensure attainment of the quarterly net domestic borrowing targets.	Strengthen public financial management. Monthly reports from meetings will help better monitoring of quarterly NDB targets under the SMP.	End-April 2019 and monthly thereafter	Met
Revise the draft MTEFF, incorporating the rebased GDP series, and ensuring consistency with the MTDS (including debt relief outcomes) and the National Development Plan (NDP).	The MTEFF serves as a credible anchor for medium-term reform and investment planning and debt sustainability	End-June 2019	Met

Table 3. The Gambia: Structural Benchmarks, 2019 (concluded)

Measures	Macro Rationale	Timing	Status
Debt management (MoFEA)			
Prepare a report on debt relief anticipated/received from The Gambia's main creditors, as an annex to the MTDS.	Enhance debt management capacity.	End-June 2019	Met
Prepare quarterly reports on external debt commitments, agreements and disbursements as published in the debt bulletin.	Enhance debt management and transparency.	End-June, End-September, and End-December 2019	Met
Reconcile end-December 2018 debt data with external creditors.	Reliable and complete information on end-year debt stocks at end-2018.	End-June 2019	Met. 97 percent of external debt stock reconciled. Pending: Taiwan Province of China and Libya.
Payments system stability and financial governance (CBG)			
Set up a dedicated unit at the Banking Department of the CBG, separate from payments system operations, to oversee developments in the payments system.	To strengthen payments system oversight.	End-April 2019	Met
Publish the audited 2017 financial statements of the CBG.	To foster transparency and strengthen the financial governance of the CBG.	End-May 2019	Met
Publish the audited 2018 financial statements of the CBG.	To foster transparency and strengthen the financial governance of the CBG.	End-September 2019	Not met. Implemented in November 2019
Governance (MoFEA & CBG)			
Complete the validation of audited domestic arrears (including to SOEs) and prepare a strategy with clear amounts and timeline for clearance of legitimate claims and accounting for outcomes from SOE special audits.	To improve service delivery by, and financial sustainability of, public enterprises.	End-June 2019	Not met. Validation of cross SOE arrears completed and the strategy for their clearance completed. The audit report on MDA's arrears completed.

Table 4. The Gambia: Proposed Structural Benchmarks for 2020

Measures	Macro Rationale	Timing	Status
Prior actions			
Cabinet to approve and submit the draft 2020 budget, consistent with program objectives, to the National Assembly.	To ensure that the budget is aligned with the program objectives as an anchor for macroeconomic stability.	Prior to the IMF Board discussion of program request	Met
Submit to Cabinet a revised draft of The Gambia Public Procurement Authority Act, restricting the use of executive waivers.	To foster efficiency in public investment by eliminating single sourcing, notably, for large projects.	Prior to the IMF Board discussion of program request	Met
Domestic revenue mobilization (GRA/MOFEA)			
GRA to complete tax registry clean-up at tax offices in the greater Banjul area (collecting over 90 percent of tax revenue).	To speed up payment processing and bolster enforcement actions.	End-June 2020	
MoFEA to produce a draft tax exemptions policy for Cabinet approval.	To reduce revenue leakage and better define the legitimate scope for tax exemptions.	End-September 2020	
Public financial management (MOFEA/CBG)			
Develop a monthly cashflow plan for the whole year, consistent with the 2020 Budget.	To strengthen Treasury cash management.	End-March 2020	
Prepare a set of criteria for project selection to be approved by GSRB.	PIMA recommendation to strengthen governance and reduce corruption risk.	End-June 2020	
MoFEA to submit an assessment report on subvented agencies to Cabinet with proposals for their rationalization.	To reassess the number and performance of subvented agencies in line with current policies.	End-September 2020	
Debt management (MoFEA/CBG)			
Update the MTDS and publish a new domestic debt management strategy document. The debt management strategy will envisage the use of longer-term instruments to manage rollover risk.	To reduce rollover risk, optimize issuance decisions, and strengthen benchmark pricing through extension of the yield curve.	End-September 2020	
Central bank governance and bank supervision (CBG)			
Develop and publish a strategic plan addressing the key recommendations of the 2019 Financial Sector Stability Review.	To highlight financial system development and stability needs.	End-June 2020	
Governance and transparency (MoFEA)			
Publish an annual statement (that is regularly provided to the National Assembly) on MDAs' compliance with internal audit recommendations.	To strengthen accountability to public of articulating and addressing governance failings in MDAs.	End-December 2020	

Attachment II. Technical Memorandum of Understanding

Introduction

This memorandum sets out the understandings between The Gambian authorities and the staff of the International Monetary Fund (IMF) regarding the definitions of quantitative targets and structural benchmarks that will be used to monitor performance under the ECF-supported program through end-2020. It also sets out the related reporting requirements and describes the adjusters that will be applied to certain quantitative targets under the program.

QUANTITATIVE TARGETS

A. Net Domestic Borrowing of the Central Government

1. Definition: The *net domestic borrowing* of the Central Government is defined as the change in net claims on the Central Government by the domestic monetary sector (monetary authorities and deposit money banks) plus the change in the discounted value of domestic government securities held by the non-monetary sector. Net domestic borrowing also covers the change in any other net claims on the Central Government by the domestic non-monetary sector, as well as the change in government arrears on domestic debt service obligations. Central Government excludes local and regional governments and public enterprises. In computing the net domestic borrowing of the Central Government, the following components are excluded: (i) on-lending of the RCF to the budget, (ii) changes in the balances of the project accounts listed in Table 1, and (iii) the face value of government securities issued to increase the CBG's capital to the value mandated in the 2018 CBG Act.

2. Adjuster: The NDB targets (ceilings) will be adjusted downward/upward by the excess/shortfall of the dalasi equivalent of the total budget support grants and loans received in that period relative to the program forecasts specified in the table below. The upward adjustment of the NDB targets to compensate for the shortfall in the disbursements of budget support may not exceed GMD 1.5 billion at end-June 2020 and GMD 1.0 billion at end-September and end-December 2020.

Text Table 1. Program Forecasts of External Budget Support Grants in 2020¹ (Cumulative flow in millions of US dollars)			
March 2020	June 2020	September 2020	December 2020
0.0	40.0	46.9	62.1
¹ This assumes disbursements of: US\$ 30 million from the World Bank and € 9 million from the EU in Q2; SDR 5 million from AfDB in Q3; and € 13.5 million from the EU in Q4.			

3. **Supporting material: Reporting on net domestic borrowing will form part of the consolidated budget report described in ¶32 below.**

B. Net Domestic Assets of the Central Bank

4. **Definition: The *net domestic assets* of the CBG are defined as the difference between reserve money and the net foreign assets of the CBG.** Reserve money is defined as the sum of currency issued by the CBG (i.e., currency in circulation) and the deposits of commercial banks at the CBG. Net foreign assets are defined as foreign assets minus foreign liabilities. Foreign assets and foreign liabilities are defined as claims on nonresidents and liabilities to nonresidents, respectively.

5. **For program monitoring purposes, in the calculation of the net domestic assets of the CBG, foreign assets and liabilities will be converted at the prevailing end-of-period market exchange rates at end-December 2019: 51.10 GMD/USD, 1.12 USD/EUR, 1.31 USD/GBP, 0.97 CHF/USD, 1.38 USD/SDR, 109.12 JPY/USD.** Foreign assets and liabilities denominated in other currencies will be converted into U.S. dollars at the prevailing end-of-period market exchange rates for end-December 2019, and then into dalasi at the rate listed above. These are accounting exchange rates only and should not be construed as projections.

6. **Supporting material: Net domestic assets of the central bank will be transmitted as part of the balance sheet of the CBG (compiled based on the TMU rates) on a monthly basis within four weeks of the end of each month. For analytical purposes, the balance sheet of the CBG compiled on a current-rate basis will also be submitted.**

C. Net Usable International Reserves of the Central Bank of The Gambia

7. **Definition: The *net usable international reserves (NIR)* of the CBG are defined as the difference between usable reserve assets and reserve liabilities.** *Usable reserve assets* are readily available claims on nonresidents denominated in convertible foreign currencies. They include the CBG holdings of SDRs, foreign currency cash, foreign currency securities, deposits abroad, and the country's reserve position at the IMF. Excluded are any assets that are pledged, collateralized, or otherwise encumbered, claims on residents, claims in foreign exchange arising from derivatives in foreign currencies vis-à-vis domestic currency (such as futures, forwards, swaps, and options), precious metals, assets in nonconvertible currencies, and illiquid assets (including capital shares in international organizations). **Reserve liabilities** are all foreign exchange liabilities to residents and nonresidents, including commitments to sell foreign exchange arising from derivatives (such as futures, forwards, swaps, and options), and all credit outstanding from the IMF, but excluding any liabilities to the IMF's SDR Department.

8. **For program monitoring purposes, in the calculation of the net usable international reserves of the CBG, foreign assets and liabilities will be converted at the exchange rates listed in ¶15 above.**

9. Adjuster: The quarterly NIR targets for each quarter will be adjusted downward/upward by the US dollar equivalent of the shortfall/excess of total budget support grants and loans received in that quarter relative to the program forecasts for the quarter, as specified in the table above. The downward adjustment to the NIR targets will be capped at US\$30 million at end-June 2020 and at US\$20 million at end-September and end-December 2020.

10. Adjuster: In case of an allocation of SDRs by the IMF, the net usable international reserves of the CBG will be adjusted upward by the amount of the SDR allocation.

11. Supporting material: A detailed reserve statement with end-month data on net usable international reserves of the CBG will be transmitted within seven days of the end of each month.

D. New External Debt Payment Arrears of the Central Government

12. Definition: External debt payment arrears are defined as external debt obligations of the central government that have not been paid when due in accordance with the relevant contractual terms (taking into account any contractual grace periods).

13. For program purposes, external arrears exclude (i) financial obligations of the government for which the creditor has accepted in writing to negotiate alternative payment schedules before the relevant payment; (ii) arrears on claims which the government has represented as being disputed; (iii) arrears on claims that cannot be settled due to international sanctions; and (iv) arrears on trade credits, with the exception of arrears on payments due to the International Islamic Trade Finance Corporation (ITFC). Non-accumulation of new external debt payment arrears by the central government is a target, to be observed continuously.

14. Supporting material: An accounting of non-reschedulable external arrears (if any) by creditor countries, with detailed explanations, will be transmitted on a monthly basis within four weeks of the end of each month. This accounting would include, separately, arrears owed by the Central Government and other public sector entities to Paris Club, non-Paris-Club, private, plurilateral and multilateral creditors.

E. New Non-Concessional External Debt Contracted or Guaranteed by the Central Government

15. Definition: This target refers to new non-concessional external debt contracted or guaranteed by the Central Government denominated in any currency other than the Gambian dalasi. It applies not only to debt as defined in ¶8(a) of the Guidelines on Public Debt Conditionality in Fund Arrangements attached to Executive Board Decision No. 15688-(14/107), adopted December 5, 2014), but also to commitments contracted or guaranteed for which value has not been received. For program purposes, the guarantee of a debt arises from any explicit legal or contractual

obligation of the central government to service a debt owed by a third-party debtor (involving payments in cash or in kind). A debt will be considered contracted when conditions for its entrance into effect have been met, including approval by the National Assembly. Loans or purchases from the IMF and concessional debts as defined below, are excluded from this target as is any debt with maturity of one year or less. This performance criterion will be assessed on a continuous basis

16. For program purposes, a debt is concessional if it includes a grant element of at least 35 percent, calculated as the difference between the present value (PV) of debt and its nominal value, expressed as a percentage of the nominal value of the debt. The PV of debt at the time of its contracting is calculated by discounting the future stream of payments of debt service due on this debt. For debts carrying a variable interest rate in the form of a benchmark interest rate plus a fixed spread, the PV of the debt would be calculated using a program reference rate plus the fixed spread (in basis points) specified in the debt contract. The program reference rate for the six-month USD LIBOR is 2.42 percent and will remain fixed for the duration of the program. The spread of six-month EURIBOR over six-month USD LIBOR is -250 basis points. The spread of six-month JPY LIBOR over six-month USD LIBOR is -250 basis points. The spread of six-month GBP LIBOR over six-month USD LIBOR is -150 basis points. For debts with a grant element equal or below zero, the PV will be set equal to the nominal value of the debt. The discount rate used for this purpose is the unified discount rate of 5 percent set forth in Executive Board Decision No. 15248-(13/97).

17. Supporting material: A comprehensive record, including a loan-by-loan accounting of all new concessional and non-concessional debt contracted or guaranteed by the Central Government with detailed explanations, will be transmitted on a quarterly basis within four weeks of the end of each quarter.

18. MoFEA will forward, within four weeks of the Central Government contracting or guaranteeing any new external loan, the loan's terms and conditions including interest rate, grace period, maturity, interest, fees, and principal payment schedule with all annexes.

F. New Concessional External Debt Contracted or Guaranteed by the Central Government

19. Definition: This target refers to new concessional external debt contracted or guaranteed by the Central Government denominated in any currency other than the Gambian dalasi. It applies to debt as defined in ¶15. Concessional debt is as defined in ¶16.

20. For borrowing packages comprising both loan and grant components to meet the concessional requirement (grant element of 35 percent), only the loan components will count toward the borrowing limit.

21. Supporting material and data provision: Refer to ¶17 and ¶18.

G. Outstanding Stock of External Public Debt with Original Maturity of One Year or Less

22. Definition: This target refers to the stock of outstanding external public debt with original maturity of one year or less, owed or guaranteed by the public sector.¹ Public sector consists of the Central Government and regional governments and other public agencies, including the central bank. Trade credits are excluded from this target including the ITFC credits.

23. Supporting material: A comprehensive record of all external debt with original maturity of less than one year owed or contracted by the public sector, with detailed explanations, will be transmitted on a quarterly basis within four weeks of the end of each quarter.

H. Tax Revenue

Text Table 2. Tax Revenues Collected by The Gambia Revenue Authority

Domestic Taxes		Customs and Excise	
Revenue Code	Revenue Item	Revenue Code	Revenue Item
111101	Personal Tax	115101	Import Duty Oil
111201	Company Tax	--	Import Excise Tax Oil
113301	Capital Gains	115102	Import Duty Non-Oil
112010	Payroll Tax	114121	Import VAT Oil
114523	Business Registration Fees	114122	Import VAT Non-Oil
114404	Entertainment	114201	Import Excise Tax
142250	Pool Betting Levy	114202	Domestic Excise Duty
--	Informal Sector	115602	Environmental Tax on Imports
114402	Air Transport Levy	115201	Export Duties
111102	Stamp Duty	111301	Miscellaneous
114111	Environmental Tax		
114123	Excise Telecom		
114521	Casino, Gaming & Machines Licences		
114533	Value Added Tax (VAT)		
142231	Road tax		
114528	Firearms and games licenses		
142205	International Certificate for Motor Vehicles		
142206	General Dealers License		
142230	Mandatory Fine for Motor Traffic Violation		
--	Cattle Tax		

¹ The term "debt" has the meaning set forth in ¶8(a) of the Guidelines on Public Debt Conditionality in Fund Arrangements attached to Executive Board Decision No. 15688-(14/107), adopted December 5, 2014. "Domestic debt" is defined as debt denominated in Gambian dalasi, while "external debt" is defined as debt denominated in any currency other than the Gambian dalasi.

24. Definition: This indicative target refers to taxes and duties collected by the Domestic Taxes Department and Customs and Excises Department of the Gambia Revenue Authority (GRA). Tax revenue is the sum of revenues collected against all the tax codes outlined below (Text Table 2). Nontax revenue, such as licensing fees, fines, and levies collected by the GRA are excluded from this target. Levies collected by the GRA on behalf of other organizations are also excluded (National Education & Technology Training Levy, AU Levy, ECOWAS Levy).

25. Supporting material: A monthly report on revenue collected by the GRA will be transmitted within four weeks of the end of each month.

I. Central Bank Credit to the Central Government at Non-Market Terms

26. Definition: This target refers to the consolidated balance on the Treasury Main Account, the Consolidated Revenue Fund, and other revenue accounts. It also covers all gross claims on the Central Government on the balance sheet of the central bank, with terms (including maturity and yield) materially different from the ones prevailing in the market for Treasury bills and bonds around the time of acquisition of these claims. The target also covers any overdue payments of principal and interest on Central Government securities held by the central bank. This performance criterion will be assessed at the end of each month.

27. Supporting material: Reporting on new central bank credit to the government at nonmarket terms will form part of the monetary sector data described in ¶34 and ¶35 below.

J. Poverty-Reducing Expenditures

28. Definition: Poverty-reducing expenditures consist of expenditures financed out of The Gambia Local Fund (GLF) on the following areas: Agriculture and Natural Resources; Education; Health; Nutrition, Population and HIV-AIDS; Infrastructure Programme; Social Fund for Poverty Reduction; Implementation and Monitoring of Poverty Reduction Programmes; Support to Cross-Cutting Programmes; ICT Research and Development; Decentralization and Local Government Capacity Building; Governance and Civil Service Reform Programme.

29. Supporting material: A monthly report on poverty-reducing expenditures will be transmitted within four weeks of the end of each month.

OTHER DATA REQUIREMENTS AND REPORTING STANDARDS

30. In addition to providing the data needed to monitor program implementation in relation to the program's performance criteria, indicative targets, and structural benchmarks,

as set out above, the authorities will transmit the following data within the time frame specified below:

K. Prices

31. The monthly disaggregated consumer price index, including weights for each major category, with January 2020 = 100, will be transmitted within four weeks of the end of each month.

L. Government Accounts Data

32. A monthly consolidated Central Government budget report (i.e., the analytical table) on budget execution for the month and cumulatively from the beginning of the year, will be transmitted to the IMF within four weeks of the end of each month. The report will cover: (i) revenue data by major items (such as taxes on income, profits, and capital gains; domestic taxes on goods and services; taxes on international trade and transactions; other taxes; non-tax revenue); (ii) external grants by type (e.g., budget support grants, project grants); (iii) details of recurrent expenditure (including goods and services, interest payments, and subsidies and other current transfers); (iv) details of capital expenditure and net lending (including data on externally financed capital expenditure, expenditure from the Gambia Local Fund, and net lending); (v) the overall balance, the primary and the basic balance; and (vi) details of budget financing (including net domestic and net external borrowing and their components).

33. End-week data on net domestic borrowing (including data on the project accounts listed in Table 1) will be transmitted weekly within five business days of the end of each week.

M. Monetary Sector Data

34. The balance sheet of the CBG, prepared on the basis of current and program exchange rates, will be transmitted on a monthly basis to the IMF within four weeks of the end of each month. The balance sheet will explicitly identify all claims on, and liabilities to, the government. Claims include overdrafts, holdings of treasury bills, government bonds, advances to the government in foreign currency, and other claims on the government. Liabilities include balances in the treasury expenditure account, the consolidated revenue fund and other revenue accounts, the treasury bill special deposit account, the privatization proceeds account, and other deposit accounts. The transmission will include the individual balances on the government accounts listed in Table 1.

35. The consolidated balance sheet of the commercial banks and a monetary survey (i.e., a consolidation of the accounts of the CBG and commercial banks), including foreign currency deposits held by residents of The Gambia with commercial banks, will be transmitted within four weeks of the end of each month.

36. Daily data on reserve money will be transmitted weekly within five business days of the end of each week.

N. Treasury Bill Market and Interbank Money Market

37. Weekly data on the amounts offered and issued, net issuance, over/under subscription, and yields (interest rates) of the various instruments will be transmitted on a weekly basis within five business days of the end of each week. Data on treasury bills and CBG bills outstanding (both at face value and at discounted value and including information on the distribution by bank and non-bank holders) will be transmitted on a monthly basis within six weeks of the end of each month.

38. Daily data on the interbank money market (interest rates, maturities, and volumes of transactions) will be transmitted weekly within five business days of the end of each week.

O. External Sector Data

39. The CBG will also forward within four weeks of the end of each month, data on transactions in official reserves.

40. Daily interbank market exchange rates, defined as the simple average of the daily weighted average buying and selling rates, will be transmitted on a weekly basis within five business days of the end of the week. Weekly interbank market exchange rates, defined as the simple average of the weekly weighted average buying and selling rates, will be transmitted on a monthly basis within seven days of the end of the month. The CBG's monthly average and end-month exchange rates, including those for all currencies in which foreign assets and liabilities are denominated, will be transmitted within seven days after the end of each month.

41. Daily data on foreign exchange intervention by the central bank will be transmitted weekly within five business days of the end of each week.

42. A detailed reserve statement with end-week data on net usable international reserves of the CBG will be transmitted weekly within five business days of the end of each week.

43. The CBG will also forward monthly data on the volume of transactions (purchases, sales, and total) in the foreign exchange market by each major group of participants (CBG, commercial banks, and foreign exchange bureaus) in dalasi within seven days of the end of each month.

P. Public Enterprises' Data

44. MoFEA will forward within eight weeks of the end of each quarter, data on monthly cash flow of NAWEC, GNPC, GAMTEL, GAMCEL, GCAA, SSHFC, and NFSPMC.

45. MoFEA will forward within eight weeks of the end of each quarter, data on the stock of consolidated Central Government's stock of payment arrears to NAWEC at the end of each month.

**Table 1. The Gambia: List of Projects Accounts at the CBG
Excluded from the Calculation of NDB**

ACCOUNT NUMBER	PROJECT ACCOUNT NAME
1101004067	NATIONAL AGRICULTURAL LAND & WATER MANAGEMENT DEV. PROJECT (NEMA)
1103002218	BUILDING RESILIENCE TO RECURRING FOOD INSECURITY IN THE GAMBIA IDB COMPONENT
1101005064	AGRICULTURAL VALUE CHAIN PROJECT (GCAV)
1101004689	BUILDING RESILIENCE AGAINST FOOD & NUTRITION INSECURITY IN THE SAHEL PROJECT.
1101004483	GAMBIA COMMERCIAL AGRICULTURE VALUE CHAIN PROJECT.
1101004201	FOOD & AGRICULTURE SECTOR DEV. PROJECT. FASDEP
1103001613	BILINGUAL EDUCATION SUPPORT PROJECT
1101003606	DEV. OF THE UNI. OF THE GAMBIA PROJECT.
1101003709	AFRICA CENTRE OF EXCELLENCE (ACE)
1101000832	RURAL WATER & SANITATION PROJECT
1103001754	TRANS GAMBIA CORRIDOR PROJ.
1103000685	GLOBAL FUND MALARIA GRANT
1101003864	GEF PROJ. IMPLEMENTATION IN THE GAMBIA UNIDO/GEF 5 PROJ. MNGMNT. OFFICE
1101004304	IFMIS ADDITIONAL FINANCING PROJ.
1101004988	INST. SUPPORT ECON/FIN GOV (ISEFG) III PROJ.
1101004902	NDEMBAN ULTRA MODERN TVET CENTRE PROJ.
1201200228	UNICEF PRIMARY EDUC. PRJ
1201200252	ENERGY INFRASTRUCTURE (ROC)
1201200371	IDA 3 RD EDUC. PHASE 11 GLF
1201200399	PROJ. IMPL.MNGMT A/C PIMA
1201200451	WORLD BANK DEV. POLICY OP ACCO
1201200491	IFMIS PHASE II
3201200403	INST. SUPPORT ECON/FIN GOV A/C
3201200486	IFMIS II
3201200290	GLOBAL FUND/ MALARIA
9201200436	GOLBAL FUND/HIV

Table 2. The Gambia: Data Reporting Requirements

Responsible Institution	Data Type	Frequency	Reporting Deadline
Central Bank of The Gambia (CBG)	T-bills auction data, Inter-banks rates & other accompanying data & tables	Weekly	7 days after week-end
	Project accounts data	Weekly	7 days after week-end
	International reserves and Foreign & Domestic Assets data (NIR, NFA & NDA)	Weekly	7 days after week-end
	Foreign exchange liquidity forecasts statement/report	Weekly	7 days after week-end
	Commercial banks' balance sheets	Monthly	30 days after month-end
	Commercial banks' Forex net open position statement/report	Monthly	30 days after month-end
	CBG balance sheet (including NDA)	Monthly	30 days after month-end
	CBG reserves statement/report	Monthly	30 days after month-end
	Statement/report on CBG credit to Gov. at non-market interest rates; and Gov.'s overdue payments to CBG	Monthly	30 days after month-end
	Statement/report of transactions in official reserves	Monthly	30 days after month-end
	Financial Soundness Indicators	Monthly	30 days after month-end
	Commercial banks' income statements	Quarterly	30 days after quarter-end
	Balance of payments (BOP)	Quarterly	30 days after quarter-end
	Stock of outstanding public debt of maturity not exceeding 1year	Quarterly	30 days after quarter-end
	Statement/report on concessional & non-concessional debts contracted or guaranteed by government	Quarterly	30 days after quarter-end
Ministry of Finance & Economic Affairs (MoFEA)	Statement of Government Operations (SGO)	Monthly	30 days after month-end
	Poverty-reducing expenditure data	Monthly	30 days after month-end
	Consolidated Central Gov. budget execution	Monthly	30 days after month-end
	SOE cash flow statements (i.e. 13 SOEs)	Monthly	30 days after month-end
	External debt reports	Monthly	30 days after month-end
	Statement of external payment arrears by Central Government & SOEs	Monthly	30 days after month-end
	Staff Monitored Program (SMP) implementation matrix	Monthly	30 days after month-end
Gambia Revenue Authority (GRA)	Monthly Revenue Report	Monthly	30 days after month-end
	Oil volumes and tax collected on oil imports	Monthly	30 days after month-end
	Revenue collection by tax type	Monthly	30 days after month-end
	Tax exceptions\duty waivers	Monthly	30 days after month-end
Gambia Bureau of Statistics (GBoS)	Consumer price index (CPI)	Monthly	30 days after month-end
	Producer price index (PPI)	Monthly	30 days after month-end
	Data on exports (by product type, quantity, country, etc.)	Monthly	30 days after month-end
	Data on imports (by product type, quantity, country, etc.)	Monthly	30 days after month-end
	Gross domestic product (GDP)	Quarterly	90 days after year-end
Ministry of Agriculture (MoA)	Crop field cultivation per hectare	Quarterly	90 days after year-end
	Crop yield	Quarterly	90 days after year-end
	Livestock population by region	Quarterly	90 days after year-end
Gambia Tourism Board (GTB)	Tourists arrivals by nationality	Monthly	30 days after month-end
	Out-of-pocket tourists expenditures	Monthly	30 days after month-end