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**SUMMARY PREPARED BY THE OFFICE OF THE HIGH COMMISSIONER FOR
HUMAN RIGHTS, IN ACCORDANCE WITH PARAGRAPH 15 (C) OF THE
ANNEX TO HUMAN RIGHTS COUNCIL RESOLUTION 5/1**

Gambia*

The present report is a summary of 12 stakeholders' submissions¹ to the universal periodic review. It follows the structure of the general guidelines adopted by the Human Rights Council. It does not contain any opinions, views or suggestions on the part of the Office of the United Nations High Commissioner for Human Rights (OHCHR), nor any judgement or determination in relation to specific claims. The information included herein has been systematically referenced in endnotes and, to the extent possible, the original texts have not been altered. Lack of information or focus on specific issues may be due to the absence of submissions by stakeholders regarding these particular issues. The full texts of all submissions received are available on the OHCHR website. The report has been prepared taking into consideration the four-year periodicity of the first cycle of the review.

* The present document was not edited before being sent to the United Nations translation services.

I. BACKGROUND AND FRAMEWORK

A. Scope of international obligations

1. International PEN, International Publishers Association and Index of Censorship (IP/IPA/IoC) recommended that the Gambia ratify the International Convention for Protection of All Persons From Enforced Disappearance and other international instruments that the Gambia is not yet a party to.²

B. Constitutional and legislative framework

N/A

C. Institutional and human rights infrastructure

N/A

D. Policy measures

2. Sexual Rights Initiative (SRI) reported that initiatives to promote human rights, and the rights of women in particular, have been made in recent years as set out in the National Policy on the Advancement of Gambian Women, the National Population Policy, and other programmes and policies, which address education, health, and reproductive rights.³

II. PROMOTION AND PROTECTION OF HUMAN RIGHTS ON THE GROUND

A. Cooperation with human rights mechanisms

3. Center for Civil and Political Rights (CCPR) reported that, in the past twenty years the Gambia was considered by the Committee on the Elimination of Discrimination Against Women (CEDAW) and the Committee on the Rights of the Child (CRC) after submission of a national report, but that twenty-six reports on the implementation of the International Human Rights Treaties it has ratified are overdue. The Gambia is not up to date in reporting to any treaty body.⁴

4. CCPR added that, in February 2009 the Human Rights Committee declared the Gambia to be in breach of its obligation to cooperate with the Human Rights Committee in the performance of its functions under Part IV (Article 40) of the International Covenant on Civil and Political Rights (ICCPR).⁵ CCPR indicated that the Gambia has persistently failed to cooperate with the Human Rights Committee and its follow-up procedure since 2002, and this was the first time that the Human Rights Committee declared a State Party in breach of its obligations.⁶ CCPR suggested that the Gambia should be encouraged to submit its overdue reports as soon as possible, where necessary seeking technical support from the OHCHR, and recommended that the Gambia implement the Human Rights Committee's Concluding Observations (CCPR/CO/75/GMB) as a matter of priority.⁷

5. IP/IPA/IoC recommended that the Gambia issue invitations to the UN Special Rapporteurs on the promotion and protection of the right to freedom of opinion and expression, and on the independence of judges and lawyers.⁸

B. Implementation of international human rights obligations,

1. Equality and non discrimination

6. SRI reported that the Constitution of the Gambia contains wide-ranging provisions on the "Protection of Fundamental Rights and Freedoms", including the right to equality and non-discrimination. However, the Constitution specifically exempts from these provisions laws relating inter alia to marriage, divorce and inheritance.⁹ In addition, SRI stated that one of the main factors impeding the effective protection of human rights is the dominance of customary and religious law and a range of traditional, cultural and religious beliefs that perpetuate discriminatory and harmful practices.¹⁰ SRI recommended that the government harmonize existing civil and religious laws and customary practices with the Gambia's obligations under the international treaties it has ratified.¹¹

7. SRI reported that, although the Married Women's Property Act gives married women the right to own their property and an equal capacity to enter into contracts, customs and traditions continue to be a bar to the enjoyment of these rights by married women. Land is usually administered by male family heads. Inheritance matters are usually settled on the basis of customary or Shari'a law, whereby women get a smaller proportion of the property.¹² SRI recommended that the government take measures to ensure that the capacity of a woman to own property is not restricted on the basis of her marital status or other discriminatory grounds.¹³

8. The International Gay and Lesbian Human Rights Commission (IGLHRC) reported that, in the Gambia, homosexual conduct is criminalized in the 1965 Criminal Code and that those found guilty of such acts can be imprisoned for up to 14 years. IGLHRC also reported that, in 2008 and 2009, the President of the Gambia called for violence and discrimination and expulsion of 'homosexuals', and called for them to be expelled from their dwellings¹⁴. The Trade Union Congress (TUC) was disturbed by homophobic comments by the Gambian Head of State and strongly condemned arbitrary arrests of citizens alleged to have engaged in homosexual practices.¹⁵ IGLHRC recommended that the Gambia bring its legislation into conformity with its international human rights obligations by repealing all provisions criminalizing sexual activity between consenting adults, and by ensuring non-discrimination by ensuring access to adequate housing and freedom from or remedies for forced evictions, or the threat of forced evictions on the basis of sexual orientation¹⁶.

2. Right to life, liberty and security of the person

9. Amnesty International (AI) stated that it received reports of journalists becoming victims of enforced disappearance.¹⁷ AI, Media Foundation for West Africa (MFWA) and IP/IPA/IoC highlighted the case of Chief Ebrima Manneh, a reporter at the government-owned *Daily Observer*, who was reportedly arrested in July 2006 by National Intelligence Agents and has not been seen since.¹⁸ In its Resolution 134 (XXXXVIII) 08, the African Commission on Human and Peoples' Rights (ACHPR) requested the immediate and unconditional release of Chief Ebrima Manneh, Kanyie Kanyiba and all prisoners of conscience, and called upon the Gambia to immediately and fully comply with the judgement of the ECOWAS Community Court of Justice in respect of the release of Chief Ebrima Manneh from unlawful detention and pay the damages awarded by the Court.¹⁹ AI, MFWA and IP/IPA/IoC made similar recommendations.²⁰

10. AI, MFWA, IP/IPA/IoC and the TUC also reported on the killing of Deydra Hydera, a prominent journalist, who had opposed very vocally the 2004 legislation on the media.²¹ AI mentioned that the government has made little effort to investigate this matter.²² MFWA

recommended the establishment of independent bodies to investigate this killing.²³ IP/IPA/IoC made a similar recommendation.²⁴

11. AI reported that opposition politicians and their supporters are also at risk of becoming victims of enforced disappearance and mentioned one case that occurred after the 2006 presidential elections. According to AI, five National Intelligence Agency (NIA) staff members disappeared after the 2006 alleged coup attempt and appear to have become victims of enforced disappearance and possible extra judicial execution²⁵.

12. The Commonwealth Human Rights Initiative (CHRI) referred to the interception, in 2005, of a group of 56 foreigners, including 44 Ghanaians by Gambian security forces, in the waters off the Gambia, while on their way to Europe. A number of them were killed upon entry to the Gambia allegedly on suspicion of plotting a coup. In April 2009, a joint ECOWAS and UN investigating team submitted its final report, which found out that there were some 'rogue elements' within the Gambian security services that were to blame for the deaths and disappearances of the Ghanaians but that the state of the Gambia and its leadership were not to blame. Both the Ghana and Gambia governments signed a Memorandum of Understanding in July 2009. In the memorandum, the two governments acknowledged that the Gambian government is not directly or indirectly implicated in the deaths of disappearances of the Ghanaians, but it has, nevertheless, agreed to make contributions to the families of the 6 Ghanaians found dead in its territory. The governments also pledged to pursue all available means to arrest and prosecute all those involved in the deaths and disappearances of the Ghanaians concerned and ECOWAS citizens.²⁶ AI reported that no investigations have been carried out to bring those responsible to justice.²⁷ CHRI recommended that the Gambia ensure that all victims that were reportedly involved in the incident are adequately compensated and demanded that the Gambia take serious measures to investigate the whereabouts of the missing emigrants, including seeking international cooperation to assist it to undertake a comprehensive and legitimate investigation.²⁸

13. AI indicated that special units within the NIA, as well as the President's personal protection officers and members of the army and the police allegedly tortured or ill-treated detainees. Torture and other ill-treatment are used to obtain information, as punishment and to extract confessions to use as evidence in court.²⁹ AI provided specific examples of 10 military personnel and five civilians tortured while in detention further to the 2006 alleged coup attempt.³⁰ The MFWA also reported on complaints of torture made by journalists, who had been detained at either the NIA headquarters or the Mile Two Prison.³¹

14. AI has documented cases of unlawful arrest and detention of perceived and real opponents since the March 2006 failed coup attempt (among them are at least 63 civilians and military personnel). Most of the arrests took place during March and April 2006. Of those arrested, 21 were charged with treason-related crimes in May 2006 and 15 cases went to trial.³²

15. AI added that, contrary to guarantees in national legislation, the police, the NIA and the Army unlawfully arrest and detain people. In practice, arrest warrants are hardly ever issued before arresting a person; detainees are rarely informed of their rights or the reason for their arrest or detention and are often denied access to a lawyer. In addition, some people are held in secret detention centres.³³ AI recommended the Gambia to immediately instruct the police, Army and the NIA to cease unlawfully arresting, detaining, and torturing those in custody and to investigate all allegations of torture and ill-treatment, extra-judicial executions, enforced disappearance, and bring to justice suspected perpetrators. AI further recommended the Gambia to ensure that prisoners are held only in officially recognized places of detention.³⁴ In its

Resolution 134 (XXXXIII) 08, ACHPR called on the Government to investigate all allegations of acts of torture in detention and extrajudicial executions.³⁵

16. AI reported on the harsh conditions of detention in Mile Two Central Prison which amounts to cruel, inhumane or degrading treatment and is aware of at least 20 people who have died in Mile Two Central Prison since 2005. No investigations have been carried out by the authorities to determine the cause of death.³⁶ AI recommended the Gambia to improve the conditions of detention in the Mile Two Central Prison and all other official places of detention.³⁷ In its Resolution 134 (XXXXIII) 08, ACHPR urged the Government to provide organizations, families and friends of persons in detention, access to the detainees to enable an assessment of their health and living conditions.³⁸

17. AI reported that, in 2009, it documented the cases of up to 1,000 people in the Gambia who were taken from their villages by “witch doctors” to secret detention centres and forced to drink hallucinogenic concoctions, which caused the death of 6 of them. AI added that it was informed by eyewitnesses and victims that the “witch doctors” were accompanied by police, army, NIA agents, and the President’s personal protection guards. In addition, a journalist who had written about these events was arrested, charged with sedition and spying, and detained until his case was dropped. Thereafter, the “witch hunting campaign” ceased, but none of those involved have been brought to justice.³⁹

18. SRI reported that female genital mutilation (FGM) is widely practiced in the Gambia, mostly in the countryside. SRI added that government policies have not been consistent. The broadcast of information against FGM on the state-controlled Radio Gambia and Gambia Television has been prohibited at various times in recent years. SRI also mentioned that the Executive had expressed a veiled threat to the campaigners and that the government has also so far refused to introduce legislation to ban FGM.⁴⁰ SRI recommended that the government take social, educational and legal measures to eliminate the practice of FGM and to ensure that victims have access to medical assistance, reparations and psychological support.⁴¹

19. SRI stated that domestic violence against women is reported to be common and largely tolerated by society and government. The police regard this issue as a private matter and there is no specific legislation to protect victims of domestic violence. Few instances of prosecutions under general assault provisions have been noted.⁴² SRI recommended that the government take social, educational and legal measures to effectively combat violence against women in the home and to ensure that victims have access to reparations, including medical assistance and psychological support.⁴³

20. Similarly, SRI reported that sexual abuse in the home and sexual harassment are believed to be widespread. Rape and assault are crimes under the law but the police tend to consider sexual abuse to be domestic issues outside their jurisdiction.⁴⁴ SRI recommended that the government implement social, educational and legal safeguards to protect women from rape, and to ensure that women who have been raped receive the full protection of the law.⁴⁵

21. The Global Initiative to End All Corporal Punishment of Children (GIEACPC) reported that corporal punishment is lawful in the home and in schools and that there is no explicit prohibition of corporal punishment as a disciplinary measure in penal institutions and alternative care settings. GIEACPC recommended that the government introduce legislation as a matter of urgency to prohibit all corporal punishment of children in the home, schools, penal institutions and alternative care settings⁴⁶.

3. Administration of justice, including impunity and the rule of law

22. MWFA reported that the judiciary in the Gambia lacks independence and has become an instrument of the Executive.⁴⁷ AI underlined that, contrary to Sections 138 and 141 of the Constitution, judges were removed and appointed by the Executive without consultation with the Judicial Service Commission.⁴⁸ MWFA highlighted that, within the last few years, the President of the Gambia has dismissed two chief justices.⁴⁹ MFWA reported that one reason for the judiciary's weakness is the appointment of foreign lawyers to key positions in courts. These lawyers have no choice than to give rulings in favour of the government in order to have their contracts renewed. Those who rule in favour of the opposition or civil society members have had their contracts terminated.⁵⁰ MWFA reported that, though the Gambia Bar Association still exists as an autonomous body, the general climate of repression and fear has affected its ability to stand up for the rights of the people. Lawyers in the Gambia are currently operating under challenging conditions due to recurrent incidents of harassment and intimidation, which have created a climate of fear in the profession.⁵¹ AI and MFWA made recommendations to the Gambia to ensure the independence and impartiality of the judiciary.⁵²

23. AI indicated that during the 2006-2007 "treason trial" in the High Court and the Military Court following the alleged 2006 coup, it documented violations of fair trial standards, including infringement on the presumption of innocence and the right to be heard by an impartial tribunal, violation of rights in pre-trial custody and during interrogation, and the use of torture to coerce confessions.⁵³

4. Right to privacy, marriage and family life

24. SRI reported that polygamy is permitted in customary and Islamic law, widely used and that in marriages carried out under these traditions, polygamy cannot be challenged in the civil courts.⁵⁴ SRI indicated that, although under the Criminal Code "defilement" of girls under 16 is a criminal offence, under customary laws girls as young as 13 years are often married off by their parents, especially in rural areas and when families are living in conditions of extreme poverty. Early marriage is one of the main causes of the high level of female illiteracy and is also associated with high rates of maternal mortality and morbidity.⁵⁵ SRI recommended that the government take legal, social and educational measures to eliminate the practice of forced and early marriages.⁵⁶

25. SRI reported that marriages can take place under civil, customary, Christian or Islamic law. Under the predominant Islamic tradition, a man can divorce a woman at any time. Although in theory both parties can be made to pay penalties if the reasons for divorce are perceived to be insubstantial, in practice only women face exacting standards of proof of their reasons for divorce. Women often have to return gifts and any dowry paid by the man. Men can re-marry immediately but women have to wait for three months.⁵⁷

26. Fundación Mundial Déjame Vivir En Paz (FMDVEP) reported that homosexuality is criminalized in the Gambia and that its President stated that he intends to behead all homosexuals placed in detention. FMDVEP recommended that marriage of gay persons as well their right to adopt children be recognized and that all sentences against gay persons solely based on their sexual orientation be eliminated.⁵⁸

5. Freedom of expression, association and peaceful assembly

27. The Gambia Press Union and the Coalition for Human Rights in the Gambia (GPU/CHRG) reported that media laws such as the 2004 Newspaper Registration Act, the 2005 Criminal Code Amendment Act, the 2009 Official Secrets Amendment Act and the Communications Bill all contradict constitutional provisions and international human rights instruments and make it practically impossible for journalists to work without breaching the law⁵⁹. GPU/GHRC added that the 2005 Criminal Code Amendment Act and Official Secrets Act, the most cited documents in all media related court cases, both criminalise press related offences⁶⁰. In addition, the MFWA reported that the Decree No. 45 establishing the NIA empowers the Minister of Interior or his designate to issue search warrants and authorise interference with correspondence, be it wireless or electronic.⁶¹

28. AI reported that the Criminal Code Amendment Act sets mandatory prison sentences for owners of media outlets and journalists convicted of publishing defamatory or seditious material. There is also a prison term or hefty fines for publishing or broadcasting “false news”, and the state may confiscate any publication deemed “seditious”.⁶² The 2004 Newspaper Amendment Act requires that all print and broadcast media re-register and sign a statement of bond, certifying that they have sufficient funds to pay any penalties that might be imposed by the courts.⁶³ MFWA recommended that legislation which infringe press freedom and freedom of expression be amended by repealing sedition and criminal defamation offences.⁶⁴

29. GPU/CHRG reported that human rights violations against journalists and media workers have been on the increase since 2004, with 2006 and 2009 being the worst years on record.⁶⁵ AI stated that many journalists and human rights defenders have been harassed, threatened and been unlawfully arrested and detained if suspected of providing information to on-line news sources or foreign journalists or publications.⁶⁶ MFWA indicated an increase of such arrests over the past two years and reported that most of the detained journalists have been held incommunicado for long periods without charge.⁶⁷ In its Resolution 134 (XXXXIII) 08, ACHPR recalled that since the March 2006 attempted Coup d'état, severe deterioration in the enjoyment of the right to freedom of expression particularly involving attacks on the independent media, has led to several journalists being arrested or fleeing the country, thereby violating the right of the people of the Gambia to freedom of expression and access to information.⁶⁸ In its Resolution 134 (XXXXIII) 08, ACHPR called on the government to bring to an immediate end the harassment and intimidation of independent media institutions and respect the rights of journalists and other human rights defenders.⁶⁹

30. In addition, IP/IPA/IoC reported that journalists are sometimes held for weeks or months pending trial and those trials are often drawn out over months or years.⁷⁰ IP/IPA/IoC also indicated that cases against journalists are often highly politicized and reveal a clear lack of independence on the part of the judiciary.⁷¹

31. AI reported that, since 1994, at least 29 journalists have left the country, more than half of them in the last two years, and at least 10 of them have been granted asylum elsewhere.⁷² In addition, AI reported that journalists have also been subject to unfair trials.⁷³ AI and IP/IPA/IoC made reference to the six journalists sentenced to jail in August 2009 because they had criticized a televised speech by the President about the unsolved murder of journalist Deydra Hydera.⁷⁴ The TUC pointed out various irregularities during the trial related to the death of the journalist.⁷⁵

32. MFWA reported that most media in the Gambia have become voiceless due to repression and provided examples of radio stations and newspapers, which have been shut down or banned

from operating.⁷⁶ IP/IPA/IoC highlighted the case of the bi-weekly *The Independent*, which was banned following the 2006 coup attempt and which remains banned.⁷⁷

33. IP/IPA/IoC reported that human rights abuses and suppression of political and social dissent by the army, NIA and police, are widespread.⁷⁸

34. TUC reported that, in 2007, the Representative of the UN Development Programme was asked to leave the country when she expressed doubts about the effectiveness of the cure for AIDS proposed by the Gambian President.⁷⁹

6. Right to social security and to an adequate standard of living

35. SRI recommended that the government provide information on personal hygiene and provide materials to enhance utilization of available sanitary facilities in the schools.⁸⁰

36. SRI reported that, according to officials at the Gambian Department of State for Health, poverty has led to increased prostitution and also has contributed to the rise in HIV/AIDS infections. However, there is little information about prevalence rates amongst high risk groups, which could distort the true extent of the prevalence of the disease in the country. SRI recommended that the government provide support to groups at higher risk of contracting HIV like sex workers, truck drivers and fishermen for behavioural change and implement community development programs to reduce the stigmatization affecting sex workers and women in general.⁸¹

III. ACHIEVEMENTS, BEST PRACTICES, CHALLENGES AND CONSTRAINTS

N/A

IV. KEY NATIONAL PRIORITIES, INITIATIVES AND COMMITMENTS

N/A

V. CAPACITY-BUILDING AND TECHNICAL ASSISTANCE

N/A

Notes

¹¹¹ The stakeholders listed below have contributed information for this summary; the full texts of all original submissions are available at: <http://www.ohchr.org>. (One asterisk denotes a non-governmental organization in consultative status with the Economic and Social Council)

Civil society

AI	Amnesty International*, London, united Kingdom
CCPR	Center for civil and political rights, Geneva, Switzerland
CHRI	The Commonwealth Human Rights Initiative*, India
FMDVEP	Fundación Mundial Déjame Vivir En Paz,
GIEACPC	Global initiative to End All Corporal Punishment of Children, London, United Kingdom
GPU/CHRG	The Gambia Press Union; The Coalition for Human Rights in Gambia, Banjul, The Gambia, joint submission
IGLHRC	International Gay and Lesbian Human Rights Commission, New York, USA
IP/IPA/IoC	International PEN*; International Publishers Association*; Index of Censorship, London, United Kingdom, joint submission
MFWA	Media Foundation for West Africa
SRI	Sexual Rights initiative,
TUC	Trade Union Congress, London, United Kingdom

Regional intergovernmental organization

ACHPR	African Commission on Human and Peoples' Rights, Banjul, The Gambia
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² IP/IPA/IoC, p. 5.

³ SRI, para. 2.

⁴ CCPR, p. 1

⁵ CCPR, p. 1

⁶ CCPR, p. 3.

⁷ CCPR, p. 4.

⁸ IP/IPA/IoC, p. 5.

⁹ SRI, para. 2.

¹⁰ SRI, para. 4.

¹¹ SRI, para. 16.

¹² SRI, para. 15.

¹³ SRI, para. 16.

¹⁴ IGLHRC, paras. 3-5.

¹⁵ TUC, para. 8.

¹⁶ IGLHRC, paras. 2, 18 & 25

¹⁷ AI, p. 4.

¹⁸ AI, p. 4 ; MFWA, p. 3 ; IP/IPA/IoC, p. 3.

¹⁹ ACHPR, p. 3.

²⁰ AI, p. 4 & 6 ; MFWA, p. 5 ; IP/IPA/IoC, p. 5.

²¹ AI, p. 5 ; MFWA, p. 4 ; IP/IPA/IoC, p. 2.

²² AI, p. 5.

²³ MFWA, p. 5.

²⁴ IP/IPA/IoC, p. 5.

²⁵ AI, p. 4.

²⁶ CHRI, p. 1-4; see also AI, p. 5.

²⁷ AI, p. 5.

²⁸ CHRI, p. 4.

²⁹ AI, p. 5.

³⁰ AI, p. 5.

³¹ MFWA, p. 4.

- ³² AI, p. 3 ; see also IP/IPA/IoC, p. 2.
- ³³ AI, pp. 3-4.
- ³⁴ AI, p. 6 & 7.
- ³⁵ ACHPR, p. 3-4.
- ³⁶ AI, p. 5.
- ³⁷ AI, p. 7.
- ³⁸ ACHPR, p. 4.
- ³⁹ AI, p. 4.
- ⁴⁰ SRI, para. 5.
- ⁴¹ SRI, para. 6.
- ⁴² SRI, para. 7.
- ⁴³ SRI, para. 8.
- ⁴⁴ SRI, paras. 9-10.
- ⁴⁵ SRI, para. 11.
- ⁴⁶ GIEACPC, pp. 1-2.
- ⁴⁷ MFWA, p. 4 ; see also AI, p. 6.
- ⁴⁸ AI, p. 6.
- ⁴⁹ MFWA, p. 4.
- ⁵⁰ MFWA, p. 4.
- ⁵¹ MWFA, pp. 4-5.
- ⁵² AI, p. 7 ; MFWA, p. 5.
- ⁵³ AI, p. 5.
- ⁵⁴ SRI, para. 12.
- ⁵⁵ SRI, para. 13.
- ⁵⁶ SRI, para. 16.
- ⁵⁷ SRI, para. 14.
- ⁵⁸ FMDJEP, p. 3.
- ⁵⁹ GPU/CHRG, p. 1.
- ⁶⁰ GPU/CHRG, p. 2.
- ⁶¹ MFWA, p. 3.
- ⁶² AI, p. 3, see also IP/IPA/IoC, p. 1.
- ⁶³ AI, p. 3.
- ⁶⁴ MFWA, p. 5.
- ⁶⁵ GPU/CHRG, p. 2.
- ⁶⁶ AI, p. 6 ; see also IP/IPA/IoC, p. 2; TUC, para. 5.
- ⁶⁷ MFWA, p. 3.
- ⁶⁸ ACHPR, p. 3.
- ⁶⁹ ACHPR, p. 4.
- ⁷⁰ IP/IPA/IoC, p. 3.
- ⁷¹ IP/IPA/IoC, p. 4.
- ⁷² AI, p. 6 ; see also MWFA, p. 5 and IP/IPA/IoC, p. 2
- ⁷³ AI, p. 6.
- ⁷⁴ AI, p. 7; IP/IPA/IoC, p.5; see also GPU/CHRG, pp. 2-3.
- ⁷⁵ TUC, para. 4.
- ⁷⁶ MFWA, p. 5.
- ⁷⁷ IP/IPA/IoC, p. 2.
- ⁷⁸ IP/IPA/IoC, p. 2.
- ⁷⁹ TUC, para. 6.
- ⁸⁰ SRI, para. 19.
- ⁸¹ SRI, para. 22.