An Extended Policy Brief: Gold Rush Chaos and Golden Curse: How Ghana's Political Elite Are Selling Out the Nation's Posterity for Personal Gain

"The natural environment sustains the life of all beings universally."—Dalai Lama.

"Sustainable development is the development that meets the needs of the present without compromising the ability of future generations to meet their own needs." —Gro Harlem Brundtland.

Executive Summary

This policy brief critically examines Ghana's ongoing struggle with illegal small-scale mining (galamsey) and its devastating impacts on the nation's environment, economy, and social fabric. It traces the historical context of gold mining in Ghana, analyses the evolution of legal and regulatory frameworks, and identifies critical implementation challenges. The brief highlights the multifaceted impacts of illegal mining on Ghana's economy, environment, and social fabric, emphasising the severe consequences for water bodies, forests, and public health. Key findings include:

1. **Historical Context**: Ghana's rich gold mining heritage has been overshadowed by the proliferation of unregulated and illegal mining activities.
2. **Environmental Crisis**: Galamsey has led to severe deforestation, water pollution, and biodiversity loss, with iconic rivers like Pra, Ankobra, and Birim heavily degraded.
3. **Economic Impact**: While providing livelihoods for thousands, illegal mining results in substantial tax revenue losses and market distortions undermining legal mining operations.
4. **Health Hazards**: Environmental degradation increases the risks of mercury poisoning, heavy metal contamination, and community health issues.
5. **Political Complicity**: Evidence suggests high-level political involvement in illegal mining, with some government officials and party members allegedly benefiting from or protecting illicit operations.
6. **Regulatory Failures**: Despite numerous laws and initiatives, weak enforcement, corruption, and lack of political will have hampered efforts to combat galamsey effectively.
7. **Transnational Complexities**: The involvement of foreign nationals, particularly Chinese miners, has added layers of complexity to the issue.
8. **Stakeholder Conflicts**: Tensions between various stakeholders, including local communities, traditional authorities, and large-scale mining companies, complicate solutions.
9. **Forest Reserve Exploitation**: Recent regulations allowing mining in forest reserves have sparked controversy and could exacerbate environmental damage.

The brief concludes that addressing galamsey requires a multifaceted approach, balancing economic needs with environmental protection and social equity. It proposes immediate, short-term, medium-term, and long-term measures to combat illegal mining, strengthen enforcement, and promote sustainable alternatives. Urgent action is needed to prevent further irreversible damage to Ghana's natural resources and to secure a sustainable future for its mining sector and affected communities.

Keywords: #Ghana #Galamsey #SmallScaleMining #EnvironmentalDegradation #PoliticalComplicity #ResourceGovernance

1. Introduction: From Gold Coast to Ghost Coast—Ghana's Environmental Nightmare

Historically known as the Gold Coast, Ghana boasts a rich legacy of gold mining dating back to pre-colonial times, possibly prehistoric times. This heritage has profoundly shaped the country's economic, social, and political landscape. However, the proliferation of unregulated small-scale mining and illegal mining operations, locally known as "galamsey," has cast a dark shadow over this golden legacy in recent decades.

The environmental toll of these activities is staggering. Once pristine rivers and streams, vital water sources for communities, now run muddy and toxic. Once lifelines of their regions, the Pra, Ankobra, and Birim rivers are now

heavily polluted, their ecosystems devastated. Vast tracts of forest reserves, crucial for biodiversity and climate regulation, are being indiscriminately cleared, leaving lunar-like landscapes of abandoned pits and degraded soil.

The human cost is equally alarming. Pregnant women and unborn children in mining areas face heightened risks of mercury and heavy metal poisoning, potentially leading to severe developmental issues. Local farms and food crops are contaminated with heavy metals, posing long-term health risks to entire communities and urban populations. The strain on water treatment facilities has reached critical levels, with some municipal plants shutting down due to the extreme pollution of their water sources.

While Ghana has implemented various laws, regulations, and initiatives to combat illegal mining, these efforts have faced significant challenges in implementation and enforcement basically because of a lack of political will, commitment, and even complicity. The small-scale mining sector, when properly regulated, has the potential to contribute significantly to local economies and provide livelihoods. However, the proliferation of illegal activities threatens to outweigh any short-term economic benefits with long-lasting environmental and health consequences.

This policy brief examines the historical context, current legal frameworks, and implementation challenges in Ghana's efforts to regulate small-scale mining and combat galamsey. By analysing the multifaceted impacts on the environment, health, and society, it aims to offer comprehensive recommendations for sustainable solutions that balance economic development with the urgent need to protect Ghana's natural resources and the well-being of its people.

2. Problem Statement: The Cancer of Corruption—Why Ghana Cannot Stop the Galamsey Menace

Despite Ghana's implementation of numerous laws, regulations, and initiatives to govern small-scale mining and combat illegal mining, the country continues to face significant challenges in managing this sector. These include:

- Widespread and persistent illegal mining activities, often with sophisticated "Third Industrial Revolution" equipment and quasi "approtech" expedients (floating "Chamfan" washing plants), and evasion techniques.
- Severe environmental degradation, including deforestation, water pollution, and destruction of biodiversity.
- Significant health and safety risks for miners, local communities, and urban populations, including mercury poisoning and contamination of food sources.
- Substantial loss of government revenue due to tax evasion in the informal mining sector.
- Social disruption in mining communities, including conflicts between locals and migrant miners.
- Corruption and political interference undermining enforcement efforts.
- Transnational complexities and the nexus with foreign nationals and emerging armed militias.
- Inadequate resources and capacity for effective monitoring and enforcement.
- Challenges in providing viable alternative livelihoods for those dependent on illegal mining.
- Weak inter-agency collaboration and coordination in addressing the multifaceted nature of the problem.

3. Overview of the Impact: Blood Gold—The True Cost of Ghana's Illegal Mining Epidemic

Illegal small-scale mining, or "Galamsey," has become a significant socio-economic and environmental issue in Ghana. While small-scale mining has the potential to contribute positively to local economies, the illegal aspect of this activity has resulted in severe multifaceted challenges warranting a thorough examination (see Table 1: Metrics of Quantitative Data on Economic Losses and Environmental Impact, and Annex A: Photos of the Impact).

3.1 Economic Impact

- **Economic Contribution vs. Revenue Loss**: Illegal small-scale mining provides livelihoods for thousands of individuals, particularly in rural areas with limited alternative employment opportunities. The absence of viable alternative sources of income for those engaged in illegal mining poses a significant barrier to the successful implementation of anti-galamsey initiatives. Without sustainable economic alternatives, individuals will likely continue their involvement in illegal mining. However, the informal nature of these operations means that the government loses substantial tax revenues. Estimates suggest that significant portions of gold produced through illegal mining evade taxation, leading to losses that could otherwise be invested in public services and infrastructure.

- **Market Distortion**: The presence of illegal miners creates an uneven playing field for licensed small-scale miners and larger mining companies. The illegal operations often undercut prices, making it difficult for legal miners to compete. This market distortion can lead to decreased investment in the legal mining sector, hindering its growth and sustainability. The long-term impacts create a cycle of poverty and dependency on illegal mining activities, complicating efforts for sustainable solutions.
- **Job Creation vs. Economic Instability**: While illegal mining creates jobs, these positions are often precarious and need more benefits. The informal nature of this sector means that workers are vulnerable to fluctuations in demand for gold and are often forced to work in dangerous conditions without any safety net. Furthermore, the rapid influx of people into mining areas can strain local economies and infrastructure, leading to economic instability.

3.2 Entrenchment in Political and Governance Systems

- Illegal mining often intertwines with politics, leading to the monetisation of politics and influencing policy decisions. Elected officials and miners engage in strategic behaviours that perpetuate illegal mining, with officials often failing to reduce it and miners partnering with foreign nationals and threatening to vote against non-cooperative officials.
- Small-scale mining's illegal nature undermines governance and the rule of law. Corruption and bribery are often prevalent, as illegal miners may pay off officials to overlook their activities. Governance decadence can lead to broader societal issues, including weakening institutions and increased criminal activity.
- The attraction of youth and foreign nationals to illegal mining areas, especially those in proximity to areas of conflict and instability, could also have security implications.
- The interaction between formal politics and chiefs' dominance in mineral governance shows how politicians negotiate with chiefs and miners during elections, undermining efforts to combat illegal mining.
- Political risks, including upcoming elections, can shape resource markets and mining companies, highlighting the connection between politics and mining activities.

3.3 Environmental Impact

- **Land Degradation**: Illegal small-scale mining contributes to significant land degradation. The indiscriminate deforestation and loss of arable land for mining disrupt local ecosystems, leading to biodiversity loss. Heavy machinery and manual techniques result in open pits and altered landscapes that can take years to restore.
- **Water Pollution**: The mining process, mainly using mercury and other toxic chemicals in gold extraction, produces severe water pollution. Mercury is often released into rivers and streams, contaminating water sources vital for drinking and agriculture. Due to galamsey, water production by the Ghana Water Company has decreased from 70% to 40% nationwide, with a potential halt. This poses health risks to local communities and disrupts aquatic ecosystems and fisheries, further affecting food security.
- **Soil Contamination**: The improper disposal of mining waste can contaminate soil, affecting agricultural productivity in regions adjacent to mining sites. Contaminated soil can reduce crop yields and introduce hazardous substances into the food chain.

3.4 Social Impact

- **Health Risks**: Communities engaged in illegal small-scale mining are often exposed to various health hazards—respiratory issues, cancer and skin diseases, and neurological disorders—from contact with dust, contaminated water, mercury, and chemicals. These risks are exacerbated by the lack of proper sanitation and health facilities, leading to broader public health concerns, including pressure on health infrastructure.
- **Community Resistance**: Local communities often view galamsey as a vital source of income and may perceive government actions as threatening their livelihoods.
- **Social Conflicts**: The influx of miners into rural areas often leads to tensions between local communities and migrant miners. Conflicts can arise over community displacement, land use, resource access, and environmental degradation. Additionally, illegal mining can exacerbate existing social inequalities, including child labour, as the wealth generated from mining often does not benefit local populations.

Table 2: Metrics of Quantitative Data on Economic Losses and Environmental Impact

Metric	Details
1. **Economic Losses**	
• Annual Revenue Loss	$2.3 billion (2016 report by the Ghanaian government)
• Water Production Decrease	From 70% to 40% nationwide (Ghana Water Company)
2. **Environmental Impact**	
• Deforestation (1900)	8.2 million hectares
• Deforestation (2021)	1.6 million hectares
• Water Pollution	60% of water bodies polluted (2023)
3. **Scale of Illegal Mining**	
• Active Mining Licenses (2009-2016)	56 licenses
• Active Mining Licenses (2023)	2,093 licenses
• Applications in Processing (2023)	12,779
4. **Health Impact**	
• Heavy Metal Contamination	70% of children in some mining communities (2018 study)
• Mercury Poisoning Risk	7% of the population (World Health Organisation)
5. **Foreign Involvement**	
• Chinese Nationals Involved	Up to 50,000 (2013-2017 reports)
6. **Enforcement Efforts**	
• Operation Vanguard (2017-2019)	
• Arrests	Over 2,200 illegal miners
• Equipment Seized	Thousands of pieces
• Continued Illegal Activities	Satellite imagery shows expansion in protected areas
7. **Economic Contribution of Small-Scale Mining**	
• Gold Output Contribution	35% of total gold output
• Annual Value	Approximately $1.4 billion
8. **Forest Reserve Impact**	
• Affected Forest Reserves	23%
• Loss of Original Cover	Up to 70% in some reserves

4. Legal Framework and Policy Context: Paper Tigers—Ghana's Pretentious Illegal Mining Laws

In recognition of the need to address the challenges posed by illegal small-scale mining, the government has implemented various initiatives, such as implementing several laws, regulations, and initiatives to govern small-scale mining and combat illegal mining. These can be categorised as follows.

4.1 Primary Legislation

- **Gold Mining Products Protection Ordinance (CAP. 149), 1905**: The 1905 Ordinance started regulating small-scale mining in the Gold Coast. It clamped down on small-scale mining in favour of large-scale mining by preventing the indigenes from dealing in gold ore, amalgam, bullion, retorted gold, slags, and concentrates. The Mercury Ordinance (1932) made it illegal for Ghanaians to own mercury.
- **Small-Scale Gold Mining Law (PNDCL 218)—1989:** This law was the first to legalise and regulate small-scale mining by introducing a licensing process for small-scale miners. It aimed to bring order to the previously unregulated sector, harness economic potential, and integrate small-scale mining into the formal economy.
- **Minerals and Mining Act, 2006 (Act 703):** This Act provides the framework for regulating mining activities in Ghana. It consolidates previous mining laws and provides a comprehensive framework for mining operations, including small-scale mining. It includes provisions for licensing, environmental protection, and penalties for illegal mining activities to ensure sustainable mining practices and protect the environment.
- **Minerals and Mining (Amendment) Act, 2015:** It criminalised illegal mining and introduced harsher punishments, including up to 25 years in prison, to deter illegal mining activities through stricter penalties.
- **Minerals and Mining (Amendment) Act, 2019 (Act 995):** This Act, approved with a single Parliamentary majority vote, further increased penalties for illegal mining, allowed the confiscation of equipment used in

illegal mining, and strengthened the government's ability to combat galamsey operations.

4.2 Regulations

These regulations provided detailed guidelines for various aspects of mining operations, addressing issues such as licensing, safety, explosives use, and compensation for affected communities. They can be categorised as follows, differentiated by the year in which they were passed:

- **Legislative Instruments (LIs) passed in 2012:**
  - ◊ Minerals and Mining (General) Regulations, 2012 (L.I. 2173) Regulations 24-25.
  - ◊ Minerals and Mining (Support Services) Regulations, 2012 (L.I. 2174) Regulations 2(2) & 5.
  - ◊ Minerals and Mining (Compensation and Resettlement) Regulations, 2012 (L.I. 2175).
  - ◊ Minerals and Mining (Licensing) Regulations, 2012 (L.I. 2176) Regulation 202-256.
  - ◊ Minerals and Mining (Explosives) Regulations, 2012 (L.I. 2177).
  - ◊ Minerals and Mining (Health, Safety & Technical) Regulations, 2012 (L.I. 2182) Regulation 469-492.
- **Legislative Instruments (LIs) passed in 2020:**
  - ◊ **Minerals and Mining Regulations, 2020**: This regulation introduced additional measures to combat illegal mining and established a centralised licensing system to improve the monitoring and control of mining activities.
  - ◊ **Minerals and Mining (Tracking of Earth Moving & Mining Equipment) Regulation, 2020 (L.I. 2404)**: Introduced measures to track and monitor mining equipment to prevent the use of heavy machinery in illegal mining operations.
  - ◊ **Minerals and Mining (Local Content and Local Participation) Regulation, 2020 (L.I. 2431)**: It set requirements for local content and participation in the mining sector to ensure mining activities benefit local communities and reduce illegal mining. The regulation focused on increasing Ghanaian involvement (local content and participation) in the mining sector, setting requirements for Ghanaian involvement to ensure that mining activities benefit local communities and reduce illegal mining.
- **Environmental Protection (Mining in Forest Reserves) Regulations, 2022 (L.I.2462)**:
  - ◊ It regulates mining in Ghana's forest reserves, promoting efficient resource use, stakeholder involvement, effective mineral royalty administration, and local community benefits. However, it encroaches on the Forestry and Minerals Commissions mandates, raising grounds for legal challenges. It also exceeds the Minister's authority under the Environmental Protection Act 1994 (Act 490). It misaligns with EPA functions and weak sanctions for compliance. Aside from lacking evidence of proper stakeholder consultation and gender quotas in new institutions, it creates.

4.3 Policy

Ghana's Minerals and Mining Policy, 2014, was the single key policy. It ensures sustainable mining practices and includes measures to combat illegal mining. It sets the direction for the mining sector and emphasises sustainable development and local content to balance economic benefits with environmental protection and community involvement.

4.4 Initiatives

Additionally, various initiatives have been launched, such as:

- **Controlling the Demons of the Past: The Community Mining Scheme, 2014**:

  This was introduced to provide alternative livelihoods for those involved in illegal mining, formalise small-scale mining, ensure it is conducted responsibly, and address socio-economic factors driving illegal mining. The use of the military as an initiative is discussed later.

- **Fighting the Enemy Within: Military in Anti-Galamsey Action:**

  The military has actively combated illegal gold mining (galamsey) in **four operations** from 2006 to 2021.

- ◊ **Operation Fight Galamsey (2006):** This was one of the earliest military interventions to curb illegal mining activities.
- ◊ **Operation Flash Out (2013):** This operation focused on removing illegal miners from artisanal small-scale mining (ASM) sites.
- ◊ **Operation Vanguard (2017):** Launched in 2017, this joint military-police task force was deployed to enforce mining laws and shut down illegal mining operations. Although not a law, this was a significant government initiative involving a military-police task force to provide immediate action against galamsey operations. It has been instrumental in arresting illegal miners and seizing equipment.
- ◊ **Operation Halt (2021):** This operation targeted illegal mining activities in water bodies and forest reserves, aiming to protect critical environmental resources from the impacts of galamsey.

4.5 Policy and Regulatory Challenges

The efforts outlined above have faced significant challenges, including:

- **Enforcement Difficulties**: The vast mining areas and the number of illegal operations make enforcement daunting.
- **Community Dependence**: Many communities are economically reliant on illegal mining, making it difficult to transition to alternative livelihoods.
- **Lack of Comprehensive Policy**: A cohesive, long-term strategy that balances economic development with environmental protection and social welfare is lacking.

5. Stakeholder Analysis: Strange Bedfellows—The Unlikely Alliances Fuelling Ghana's Mining Crisis

Ghana's galamsey crisis involves a complex network of stakeholders with distinct roles, interests, and impacts:

- Government Agencies and Inter-Ministerial Committees: Minerals Commission, Environmental Protection Agency (EPA), Inter-Ministerial Committee on Illegal Mining (IMCIM) and Task Forces, Ministry of Lands and Natural Resources, Mining in Forest Reserve Committee.
- Local Communities.
- Traditional Leaders and Authorities.
- Legal Small-Scale Miners.
- Illegal Miners.
- Large-Scale Mining Companies.
- Organised Labour and Local Businesses.
- NGOs and Civil Society Organisations.
- International Partners and Organisations.
- The Fourth Estate-Media.

Understanding these stakeholders and the complex interplay between these stakeholders is crucial for developing comprehensive and effective strategies to address the galamsey issue. Each group's interests and challenges must be considered in policy formulation and implementation to ensure sustainable solutions without political and other interests. See Annex B for further analysis of the stakeholders.

6. Critical Analysis: The Great Betrayal—How Ghana's Leaders Failed the People

6.1 Key Points

- Although the colonial Gold Mining Products Protection Ordinance (CAP. 149), 1905, favoured large-scale mining operations and sought to regulate small-scale mining by preventing Indigenous people from dealing in various forms of gold, it also helped preserve ecosystems from wanton environmental degradation.
- The Mercury Ordinance 1932 reinforced these aspects, making it illegal for Ghanaians to own mercury, which is essential for gold extraction, further marginalising small-scale miners.
- The Small-Scale Gold Mining Law (PNDCL 218), 1989, marked a significant watershed timeline in legalising and regulating small-scale mining through a licensing process to bring order to the sector and integrate it

into the formal economy. Its introduction was a strategic move to maximise the benefits of small-scale mining but sought to minimise its associated risks and challenges.

- Subsequently, however, the lack of political will to enforce the various applicable laws and regulations, coupled with egregious political, public and private interests, significantly escalated the challenges by establishing L.I. 2462 in 2022, opening up forest reserves to mining (see Table 2).

Table 2. Comparison of Selected Critical Gold Mining Regulations in Ghana

Aspect	Gold Mining Products Protection Ordinance (CAP. 149), 1905	The Mercury Ordinance (1932)	Small-Scale Gold Mining Law (PNDCL 218), 1989	Regulations, 2022 (L.I. 2462)
Strategic Objectives	Regulate small-scale mining, in favour large-scale mining; prevent indigenous Ghanaians from dealing in gold products	Ban mercury ownership by Ghanaians; prohibit it use by African miners	Legalise, regulate and formalise small-scale gold mining	Regulate mining activities in forest reserves
Scope	Prevent indigenes from dealing in gold ore, amalgam, bullion, retorted gold, slags, and concentrates	Make it illegal for Ghanaians to own mercury and mercury compounds	Introduce licensing process for small-scale gold mining operations	Mining in forest reserves
Benefits	Centralised and consolidate control over gold resources, favour large-scale mining operations	Control the use of mercury, reduce environmental hazards and pollution	Legal framework for small-scale miners; harness economic potential, integrate small-scale mining into formal economy	Protection of forest reserves
Impacts	Disincentivised small-scale mining; protected the environment	Criminalised African miners	Increased formalisation and regulation	Controversy over forest reserve mining

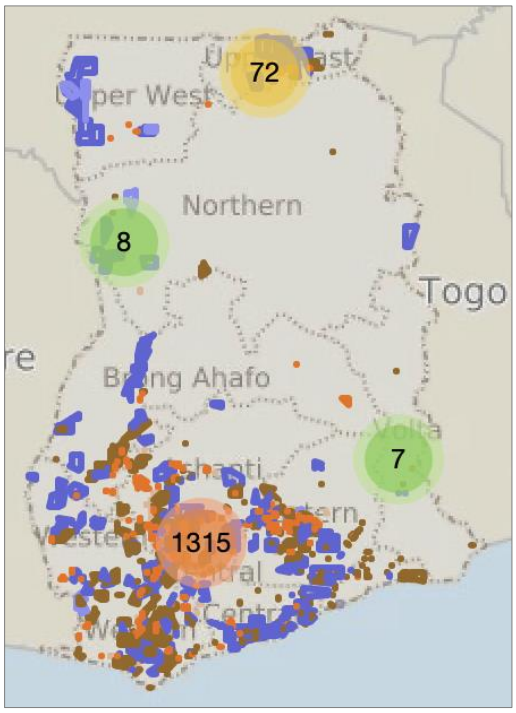
6.2 Critical Challenges

The implementation of the legal framework and initiatives have faced numerous persistent cardinal challenges, which explain the reasons why the government lost the battle against galamsey:

- **Weak Sanctions Regimes and Enforcement Limitations**: Some regulations' weak sanctions and penalties, limited resources, insufficient personnel, and the vast mining areas make them inadequate and challenging to monitor and enforce consistently. Inadequate resources for regulatory bodies, the overwhelming scale of illegal operations, and sophisticated evasion techniques by illicit miners undermine initiatives like Operation Vanguard.
- **Political Interference, Corruption, Infiltration and Impunity**: Politicisation of the galamsey issue, especially during elections and allegations of official corruption and political connections shielding illegal miners. Corruption within regulatory bodies and law enforcement agencies, including gross mismanagement of the small-scale mining sector and uncontrolled licencing regime, has undermined the effectiveness of government initiatives, eroding public trust in the government's ability to enforce laws. Prof Frimpong Boateng's report (2023), for instance, alleged that many party officials at various levels had associates involved in illegal mining, often employing Chinese workers; appointees in the Jubilee House supported illegal mining; some MPs and government appointees allegedly sold mining concessions for personal gain; traditional authorities and local officials were complicit in allowing illegal mining; and that political interference and corruption undermined efforts to combat illegal mining. The Fourth Estate (2024) also reported that several NPP politicians and officials had obtained mining licenses in forest reserves, exploiting the new L.I. 2462 (2022) that permits mining in previously protected areas, including the Oda River, Tano Nimiri and Subri River Forest Reserves. This suggests the law was designed to benefit government associates with prior knowledge. The Ghana Mining Repository showed 2093 active licences in 2023 (up from 56 between 2009-2016), plus 12,779 applications in processing, aside from an unknown number of illegal

mining activities. These reports highlight a significant lack of transparency, potential conflicts of interest, lack of political will, commitment, candour, and sometimes even complicity of officials and engaging in a contest of which political party polluted the most, significantly heightening the damage to Ghana's already threatened degraded environment and forest reserves (see Fig 1).

Figure 1: Active Licences



Source: Ghana Mining Repository, 20 Sep 2424

- **Socio-Economic Factors**: Socio-economic factors—poverty and unemployment—driving individuals to illegal mining, coupled with the limited success of alternative livelihood programmes. Many individuals and communities engage in illegal mining due to the promise of quick financial returns, which outweigh concerns about the legality and environmental degradation, high profitability incentivising continued operations and limited success of questionable alternative livelihood programmes.
- **Community Resistance and Public Perceptions**: Community resistance, dependence on illegal mining for livelihoods, lack of consistent public support for anti-galamsey efforts, and economic dependencies in mining communities.
- **Environmental Degradation**: Ongoing pollution of water bodies, deforestation and insufficient ecological protection measures.
- **Transnational Complexities**: Complex transnational involvement, particularly the involvement of foreign nationals, mainly Chinese,[1] on an unprecedented scale and lack of political will in prosecutions and deportations.
- **Institutional Challenges**: Poor collaboration among regulatory agencies, insufficient planning and coordination in government interventions and politicisation of the galamsey issue.
- **Implementation Gaps**: Slow policy adoption and lack of traction, difficulties transitioning illegal miners to formal schemes, and challenges monitoring vast mining areas.

6.3 International Comparisons

The observations on the critical comparisons in Table 3 show that Ghana's challenges with illegal mining are significant but not unique globally and must be nuanced. First, Ghana's efforts to formalise small-scale mining may be similar to those in Zimbabwe (and Indonesia), which also struggle with effective implementation. However, the fact that Ghana's political environment is more stable than that of countries like the DRC implies that its solutions should be more achievable. On the contrary, the country's environmental impacts, particularly on water resources, are severe and comparable to those in Latin America (Peru and Colombia). Unlike the DRC (and Colombia), because Ghana's illegal mining is less intertwined with armed conflict, it should be potentially more straightforward to address. It could risk violent conflict if it fails to do so, becoming like the Mano River Union countries of Liberia and Sierra Leone in the 1990s.

Table 3: International Comparison: Ghana and Other Countries Facing Illegal Mining Challenges

Metric	Ghana	Democratic Republic of Congo (DRC)	Zimbabwe

[1] In 2013, the South China Morning Post reported that up to 50,000 Chinese gold miners had been to Ghana since 2005. In 2017, the Guardian reported that an estimated 50,000 Chinese miners had left Ghana following a 2013 crackdown by authorities. Recent reports (2019-2021) have often referred to "thousands" of Chinese miners without giving precise figures.

Scale of Illegal Mining	30% of gold production	15-20% of gold production	Significant contribution
Conflict Link	No armed conflict	Linked to armed conflicts	No armed conflict
Deforestation	0.5 million hectares (2002-2020)	1.31 million hectares (2002-2020)	Severe
Governance	More stable institutions	Greater challenges due to size and conflicts	Struggling with enforcement
Economic Dependence	Heavily reliant on gold mining	Heavily reliant on gold mining	Heavily reliant on gold mining
Formalisation Efforts	Struggling to achieve and sustain	Not specified	Some success in formalisation
Environmental Challenges	Severe deforestation and water pollution	Severe deforestation and water pollution	Exacerbated by economic crisis

7. Conclusion: At the Crossroads—Ghana's Last Chance to Save Its Natural Heritage

The impact of illegal small-scale mining in Ghana is profound and multifaceted, affecting the economy, environment, and social fabric of communities. While it provides immediate economic benefits and job opportunities, the long-term consequences of environmental degradation, health risks, and social conflicts pose significant challenges. The management of small-scale mining and the fight against illegal mining in Ghana present complex challenges that require a multifaceted, sustained approach. While the government appears to have made significant efforts through legislation, periodic task forces, and community engagement, these efforts have been undermined by corruption and deficits in political will.

Addressing the root causes of galamsey, such as poverty, lack of alternative livelihoods, and weak governance, is crucial for promoting sustainable practices in the mining sector. A holistic approach incorporating robust community involvement, economic development strategies, and stringent enforcement of laws is essential to create lasting change. The path forward must focus on integrating illegal miners into the formal economy, promoting responsible mining practices, and investing in alternative livelihood programmes. This approach should be coupled with strengthened institutional capacity, improved inter-agency collaboration, and enhanced stakeholder engagement.

By balancing economic opportunities with environmental conservation and social equity, Ghana can harness the potential of its mineral wealth for sustainable development. This will require long-term commitment, adaptive policies, and collaborative efforts from all stakeholders. The success of these efforts will not only secure the future of Ghana's mining sector but also contribute to the overall well-being of its people and the preservation of its natural resources for generations to come.

8. Recommendations: Radical Surgery—Drastic Measures to Cure Ghana's Galamsey Disease

Immediate (0-6 months):

1. **Enforcement and Regulation**
   - Priority: High.
   - Action: Strengthen enforcement of existing mining regulations, including immediate cessation of heavy equipment use in illegal mining.
   - Responsible: Minerals Commission, EPA, Police Service, Military and other Security Services.
   - Outcome: 50% reduction in active illegal mining sites within six months.
2. **Stakeholder Engagement**
   - Priority: High.
   - Action: Launch a nationwide awareness campaign on the impacts of illegal mining, targeting communities, traditional leaders, and youth.
   - Responsible: Ministry of Information, NGOs, Media.
   - Outcome: Reach 70% of the population in mining-affected areas.
3. **Inter-agency Collaboration**

- Priority: Medium.
- Action: Establish a centralised task force with representatives from all relevant agencies to coordinate anti-galamsey efforts.
- Responsible: Office of the President, IMCIM.
- Outcome: Weekly coordinated operations in all major mining regions.

4. **Foreign Involvement**
   - Priority: High.
   - Action: Implement strict measures to deport illegal foreign miners and prosecute their local collaborators.
   - Responsible: Ghana Immigration Service, Ministry of Interior.
   - Outcome: 90% of identified illegal foreign miners were deported.
5. **Resource Allocation**
   - Priority: Medium.
   - Action: Increase budgetary allocation for monitoring and enforcement agencies by 30%.
   - Responsible: Ministry of Finance, Parliament.
   - Outcome: Enhanced capacity for daily monitoring of high-risk areas.

Short-term (6-18 months):

1. **Technology Adoption**
   - Priority: High.
   - Action: Introduce satellite and drone monitoring systems for real-time detection of illegal mining activities.
   - Responsible: Minerals Commission, EPA, Ghana Space Science and Technology Institute.
   - Outcome: 80% coverage of known mining areas with real-time monitoring.
2. **Legal Reforms**
   - Priority: Medium.
   - Action: Review and amend mining laws to increase penalties and streamline prosecution processes.
   - Responsible: Parliament, Ministry of Justice.
   - Outcome: Passage of amended mining laws with stricter penalties.
3. **Alternative Livelihoods**
   - Priority: High.
   - Action: Develop and implement targeted alternative livelihood programmes in mining communities.
   - Responsible: Ministry of Employment, Local Government Authorities.
   - Outcome: Provision of alternative employment to 10,000 former illegal miners.

Medium-term (18 months - 3 years):

1. **Data Management**
   - Priority: Medium.
   - Action: Establish a comprehensive database of all mining activities, including small-scale operations.
   - Responsible: Minerals Commission, National Information Technology Agency.
   - Outcome: 100% digital documentation of all legal mining operations.
2. **Capacity Building**
   - Priority: High.
   - Action: Invest in training and equipping regulatory agencies for effective monitoring and enforcement.
   - Responsible: Minerals Commission, EPA, Academic Institutions.
   - Outcome: Double the number of trained enforcement officers.
3. **Community-Based Management**
   - Priority: Medium.
   - Action: Implement community-based natural resource management programmes in mining areas.
   - Responsible: Ministry of Lands and Natural Resources, Local Communities.
   - Outcome: Establish community management committees in 50% of mining districts.

Long-term (3-5 years and beyond):

1. **Sustainable Mining Roadmap**
   - Priority: High.

- Action: Develop a comprehensive sustainable mining industry roadmap with clear milestones.
- Responsible: Ministry of Lands and Natural Resources, Stakeholder Consultation.
- Outcome: Publication and initial implementation of the roadmap.

2. **Research and Development**
   - Priority: Medium.
   - Action: Invest in R&D for environmentally friendly mining technologies.
   - Responsible: Ministry of Environment, Science, Technology and Innovation, Universities.
   - Outcome: Development or adoption of at least three new eco-friendly mining technologies.
3. **Economic Diversification**
   - Priority: High.
   - Action: Implement long-term economic diversification strategies in mining-dependent communities.
   - Responsible: Ministry of Finance, Ministry of Trade and Industry.
   - Outcome: Reduce economic dependence on mining by 30% in targeted communities.

Cross-Cutting Themes:

1. **Regular Review and Adjustment**
   - Action: Establish a quarterly review mechanism to assess the effectiveness of implemented strategies and make necessary adjustments.
   - Responsible: IMCIM, Independent Auditors.
   - Outcome: Quarterly public reports on progress and strategy adjustments.
2. **Transparency and Accountability**
   - Action: Implement a public dashboard for tracking progress on all anti-galamsey initiatives.
   - Responsible: Ministry of Information, Minerals Commission.
   - Outcome: Monthly updates of the public dashboard with key metrics.
3. **International Cooperation**
   - Action: Engage in bilateral and multilateral agreements to address transnational aspects of illegal mining.
   - Responsible: Ministry of Foreign Affairs, Ministry of Lands and Natural Resources.
   - Outcome: Signing of at least three international cooperation agreements on combating illegal mining.

Potential Challenges and Mitigation Strategies:

1. **Resistance from beneficiaries of illegal mining**
   - Mitigation: Enhance witness protection programmes and increase incentives for whistleblowers.
2. **Limited financial resources**
   - Mitigation: Explore international funding options and public-private partnerships.
3. **Political interference**
   - Mitigation: Establish an independent oversight committee with civil society representation.
4. **Technological limitations**
   - Mitigation: Partner with international and local tech companies and academic institutions for knowledge transfer.

By implementing these structured and detailed recommendations, Ghana can begin to take significant steps towards effectively addressing the galamsey issue, balancing environmental protection with economic development, and ensuring a sustainable future for its mining sector.

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Annex A: Environmental Devastation in Ghana Due to Galamsey





L/R: Destruction of River Pra (Pulse)



Chinese galamseyers (Ghana Report)



A third of the Apamprama reserve damaged by gold mining (Mongabay)



Security forces destroying illegal mining equipment (Vaultz)



Galamsey pits in a cocoa farm (Climate Insight)



Heavily polluted River Ankobra (Climate Insight)



Some of the confiscated equipment in Prof Frimpong Boateng's Report that disappeared into thin air (2023)

Annex B: Stakeholder Analysis of the Galamsey Issue

9. Government Agencies and Inter-Ministerial Committees

- **Minerals Commission**: Regulates and manages mineral resources, promoting sustainable mining and ensuring revenues contribute to national development.
- **Environmental Protection Agency (EPA)**: This agency focuses on environmental conservation and compliance, mitigating adverse mining effects on ecosystems and communities.
- **Inter-Ministerial Committee on Illegal Mining (IMCIM) and Task Forces**: Coordinate government responses to galamsey, develop policies to combat illegal mining and address community needs for enforcement to curb galamsey activities.
- **Ministry of Lands and Natural Resources**: Oversees overall policy direction for the mining sector.
- **Mining in Forest Reserve Committee**: Assesses mining impacts within forest reserves, balancing conservation with mining interests.
- **Why involved**: These entities are responsible for policy formulation, implementation, and enforcement. They are crucial in coordinating efforts across different sectors.
- **Implementation challenges**: Overlapping mandates, insufficient resources, and sometimes conflicting priorities can hinder effective action.

10. Local Communities

- Directly impacted by galamsey, experiencing both economic opportunities and environmental degradation
- Interests include securing livelihoods, preserving land, and ensuring mining benefits local development.
- **Why involved**: Their support or resistance significantly influences policy implementation and the success of anti-galamsey efforts.
- **Implementation challenges**: Economic dependence on mining makes communities resistant to change, complicating enforcement efforts.

11. Traditional Leaders and Authorities

- Chiefs, queen mothers, and other traditional leaders influence local communities considerably.
- Their interests include maintaining cultural heritage, ensuring equitable community benefits, and safeguarding land rights, which are crucial for fostering community support for galamsey interventions.
- **Why involved**: They play a crucial role in land allocation and community decision-making, often acting as intermediaries between communities and the government.
- **Implementation challenges**: Sometimes, conflicting interests between traditional authorities and formal government structures can complicate policy implementation.

12. Legal Small-Scale Miners

- Engage in regulated mining, seeking recognition, resource access, and government support.
- Advocate for distinction from illegal mining to protect legitimacy and profitability.
- **Why involved**: They represent the formal, legal alternative to galamsey and can be allies in promoting responsible mining practices.
- **Implementation challenges**: Often struggle to compete with illegal operations, which can undercut prices and operate with lower overheads.

13. Illegal Miners

- Operate without licenses, driven by poverty and quick financial gain.
- Resist government interventions due to livelihood fears.
- **Why involved**: Their activities are at the core of the galamsey issue, making them a key target for policy interventions.
- **Implementation challenges**: Their informal and sometimes secretive operations make regulation and

enforcement difficult.

14. Large-Scale Mining Companies

- Significant investments in Ghana's mining sector, affected by galamsey.
- Interests align with regulatory compliance and sustainable practices and involved in corporate social responsibility to improve community relations and mitigate negative impacts.
- **Why involved**: They can provide expertise, resources, and models for responsible mining practices.
- **Implementation challenges**: Sometimes viewed with suspicion by local communities, hindering collaborative efforts.

15. Organised Labour and Local Businesses

- Unions and worker associations in and out of the mining sector are critical in addressing illegal mining challenges.
- Depend on stable economic conditions, impacted by economic instability caused by illegal mining.
- Advocate for policy changes, community awareness, and partnerships, protecting resources while promoting sustainable development and pushing for better working conditions and legal reforms.
- **Why involved**: They represent the interests of formal sector workers and can influence industry practices.
- **Implementation challenges**: May face conflicts between protecting jobs and supporting stricter environmental regulations.

16. NGOs and Civil Society Organisations

- Advocate, educate, and monitor mining activities.
- Interests include environmental protection, social justice, and community empowerment
- **Why involved**: They often act as watchdogs and intermediaries between communities and government, providing valuable research, advocacy, and community engagement.
- **Implementation challenges**: Sometimes, they face resistance from both government and mining interests when pushing for stricter regulations.

17. International Partners and Organisations

- Provide funding and technical assistance for sustainable development.
- Support initiatives to curb illegal mining and promote legal practices.
- **Why involved**: They bring global expertise and resources to address the issue.
- **Implementation challenges**: Their involvement can sometimes be perceived as foreign interference, complicating local acceptance of initiatives.

18. The Fourth Estate: Media

- Investigate and report on galamsey activities, raise public awareness and shape public opinion.
- **Why involved**: Play a crucial role in investigating, information dissemination and holding stakeholders accountable.
- **Implementation challenges**: Sensationalism, biased reporting, or political influence can sometimes hinder constructive dialogue and solution-finding.