

Bogus mining data in Ghana poses danger

Illegal gold mining anxiety sweeps Ghana & disrupts election campaign messaging

Just weeks to the presidential elections in Ghana, middle-class concerns about illegal, irresponsible, and environmentally catastrophic gold mining have reached fever-pitch, completely derailing the campaign messaging themes of the leading political parties.

There are [protests](#), [strikes](#), [threats of strikes](#), and [hints of protests](#).

I have [chronicled the journey](#) of how Ghana got here in a previous essay.

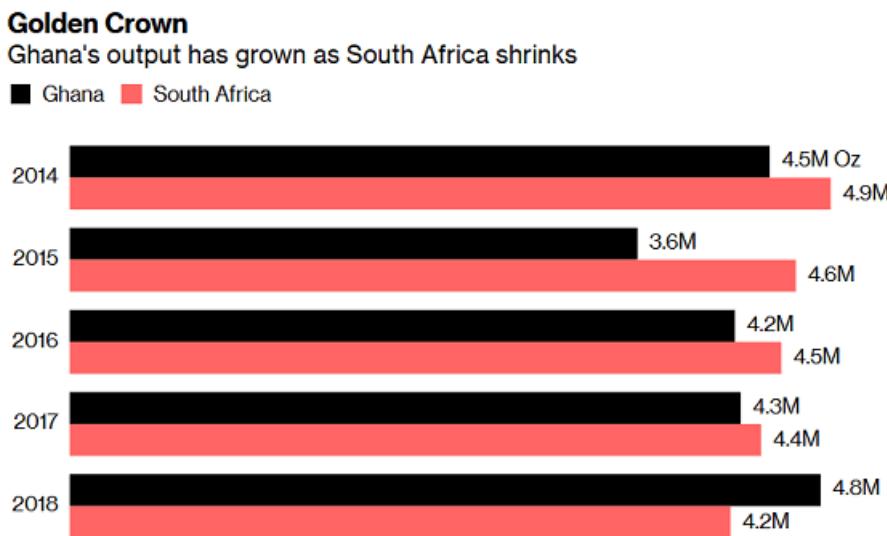
Ghana made a [Faustian pact](#) to get to the top of Africa's gold leagues

One way to look at the whole situation is that Ghana's race to the top of the gold-production charts in Africa was fueled by the steroids of irresponsible mining.

When the country overtook South Africa in 2018 as Africa's largest gold producer, both countries were bogged down in [domestic fights over illegal mining](#).

Avoiding the costs and inconveniences of building strong institutional foundations for gold production helped accelerate Ghana's massive gold rush, and ensuing gold boom

Though one could also argue that the Ghanaian authorities were more [mindful](#) than their South African counterparts of the [potential violence that could be unleashed](#) if they pushed too far, the incontrovertible fact is that the country's accommodating approach has boosted output.



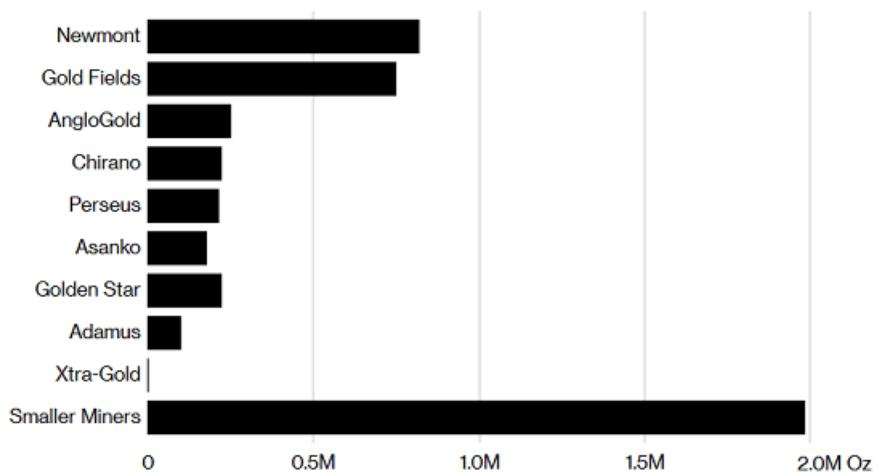
Source: The Ghana Chamber of Mines, Minerals Council South Africa

Secondary Source: [Graphic.com.gh](#) (2019)

The laxity in regulating small-scale mining in Ghana led to this sector accounting for over 40% of total production in 2018 even though Ghana purported at that time to have [banned the practice](#), beginning in February 2017, and didn't officially [lift the "ban"](#) until in December 2018.

Ghana's Top Producers

Smaller miners buoy national output



Source: The Ghana Chamber of Mines

Secondary Source: [Graphic.com.gh \(2019\)](https://www.graphic.com.gh/2019/01/15/gold-mining-in-ghana/)

Facts are always debatable in Ghana

The process by which “banned” miners somehow propelled Ghana into becoming Africa’s number one gold producer reflects a general situation where the “facts” of official policy and practice often diverge heavily from the reality on the ground. Elsewhere, [I have described this “adhocracy” in detail](#).

Whether or not one can trust any of the official facts, data, and statistics, on the strength of which Ghanaian authorities are purporting (or is it, “pretending”?) to manage the mining industry is a question that has seen some dramatic responses in recent weeks.

After a high-profile opposition party figure accused the government of dishing out mining licenses like candy, it was natural to expect pushback from ruling party types. The more important issue of whether the *nature* of recent licenses, in terms of their environmental impact, have changed (most experts say, “yes”), took a backseat as the political party fanatics battled it out.

My own interest in analysing whether sudden upticks in license issuance can be matched with corresponding increases in the capacity at the Minerals Commission, the primary regulator, to properly scrutinise the applications and monitor mining activities at the approved concessions (answer: “no”) also got no traction.

After the Minister in charge sacked the 9 district mining inspectors in 2017, it took three years for the authorities to attempt reconstituting the inspectorate regime. Even now, insiders say that there are less than 40 qualified inspectors for the whole country.

The mysterious Minerals Commission license list

None of these policy matters received much attention. Instead, ruling party affiliates circulated a “fact sheet”, ostensibly containing data supplied by the Minerals Commission, in the name of one of Ghana’s fact-checking organisations purporting to show that the opposition party, when it was in government, issued more licenses than the current, ruling, party.

DATA ON SMALL SCALE LICENCES ISSUED

YEAR	LICENSES ISSUED
2012	332
2013	283
2014	105
2015	321
2016	361
2017	7
2018	NIL
2019	103
2020	621
2021	11
2022	148
2023	38
2024	93
TOTAL	2423

SMALL SCALE LICENCES

2012 to 2016	1,402
2017 to Sept. 30, 2024	1,014
Licences valid to date	984

Fact-checking organisations dismissed the “fact sheet” [as fake](#).

Partisan hacks tossing data about to upstage rivals is a tolerable feature of competitive democracies. And when you have been in the trenches of policy activism for nearly two decades as I have, you learn to triangulate data sources to arrive at the most accurate picture of any policy matter, anyway.

I myself miscommunicated on social media by not distinguishing among the eight different mining authorisations issued in Ghana in my bid to explain concerns that aggressive ramping up of licensing not matched by increase in the number of application reviewers and inspectors is one of the ways in which Ghana lost control of small-scale mining regulation.

We can all live with some data confusion in view of the well-known capacity issues at various levels of key institutions. Misspecification, definitional inconsistencies, and sheer sloppiness in transcription, are all known to occur.

The Minerals Commission joins the fray

What is harder to live with is government institutions themselves appearing to manipulate data and, even worse, hide and distort it to deflect attention from mismanagement or even malfeasance.

Two days ago, the Minerals Commission itself seemed to have [joined the fray](#) of pushing the discredited fact-sheet designed to push a single partisan and deceptive agenda around the number of licenses issued under the two successive governments. Devoid of any analytical context.

When public servants hired to serve in strictly non-partisan institutions, particularly regulatory agencies, start to do that, I always wonder whether they are, perhaps, in cahoots with some shadowy politicians in some underhand schemes. So, I decided to take an even closer look.

Why natural resource data manipulation is dangerous in Africa

It is important, first and foremost, to appreciate the political economy of mining data in Africa. For many, many, years, [poor transparency and data manipulation enabled weak accountability](#) and, through that, corruption and mismanagement of natural resources.

In some countries, [such as Angola](#), poor data practices and lack of transparency have been linked to missing revenues assessed in billions of dollars.

To tackle this challenge, a new global standard called EITI was launched at the World Summit on Sustainable Development in 2002. In 2023, [the standard was augmented](#) to better serve stakeholders.

In Ghana, EITI (GHEITI) is managed by a local secretariat hosted at the Ministry of Finance but overseen by a [steering committee](#) with representatives from diverse institutions, including civil society organisations.

One general goal of the GHEITI process is to ensure that data is collected, analysed, and disseminated in an open and transparent manner, involving multiple stakeholders, in order to ensure checks and balances.

It goes without saying that the potential abuse of data for partisan purposes or to deflect attention from serious policy challenges would go contrary to the GHEITI standard. GHEITI would seek to audit and validate data received for dissemination to avoid any such risks.

Why the conflicting data from GHEITI and the Minerals Commission?

How, then, can the data purportedly shared by the Minerals Commission be in conflict with data being disseminated by GHEITI? A count of licenses issued is a pretty straightforward statistical exercise, no?

Look, for instance, at the data on the number of small-scale licenses issued in Ghana in 2020, the last year for which audited GHEITI data on the subject is available. Data that according to GHEITI came from the Minerals Commission. Now, compare the figures with what is in the Minerals Commission table above.

Type of Mineral Rights	Number of Licenses Granted
Export License (Mining Lease Holders)	1
Gold Exports (Buying and Selling)	36
Mining Leases	33
Prospecting Licenses	119
Reconnaissance Licenses	7
Restricted Mining Leases	99
Restricted Prospecting Licenses	1
Small Scale Mining Licenses	727
Support Service (Class A)	7
Support Services (Class B)	2
Total	1032

Source: Minerals Commission (2023)

Source: GHEITI (2023)

You would notice that the recently circulated Minerals Commission data on small scale mining licenses is nearly 20% lower than what the same Commission disclosed to GHEITI last year.

Minerals Commission keeps giving conflicting data to international organisations

In probing the issue, I discovered that the government of Ghana also gave different sets of data, coming from the same Minerals Commission, to the Global Environment Facility (GEF), UNDP, and other international bodies in its application for grants to implement the Minamata Convention, a global effort to reduce mercury pollution.

Study the data in the table below carefully. It comes from the [baseline assessment](#) of the country's current exposure to mercury pollution in 2018.

Table 3: Number of small-scale mines with license and concession		
Year	Number of Small-Scale Licenses Granted	Total Concession Size (Acres)
2012	397	9,093.21
2013	277	5,352.12
2014	99	2,152.62
2015	298	6,283.84
2016	256	5,209.00

Source: Minerals Commission data 2016

It shows that between 2013 and 2016, about 930 licenses were issued to cover about 19,000 acres of mining concessions (average of ~20 acres per license). Every single data point, however, differs materially from what is currently in circulation as official Minerals Commission data.

For example, whilst the data presented to the international organisations suggest that 256 licenses were issued in 2016, the presently circulating data says that the number of licenses issued that year to small-scale miners were 361, a whopping 40% variance.

But the real scary part is yet to come.

Baffled by the data discrepancies, I decided to mine official gazette data. By law, certain formal public acts must be gazetted, including certain actions of the Minerals Commission.

As I trudged through reams of official gazettes, nestling among information on marriage licenses and changes in matrimonial names, I began to see a strange pattern emerge.

First, very large tracts of land, of a far greater expanse than anything before, have been designated for small-scale mining since 2017.

For instance, the extent of land designated by the relevant Minister in June 2019 for small-scale mining in a single gazette notification was about 107 square kilometers or 26,500 acres.

If you have been paying attention, you would recall that, by comparison, only 19,000 acres were designated for small-scale mining in the four years from 2013 to 2016.



MINERAL RIGHTS APPLICATIONS BULLETIN
Minerals and Mining (Licensing) Regulations, 2012 (L.I.2176)
FORM 6
[Regulation 10(1), 94(1), 177(1), 207(1)]

The under-listed designated area(s) is being reserved for the application of mineral right for Small Scale Mining operations as provided in the schedule below. An owner or lawful occupier who is likely to be affected by the grant of the mineral right is hereby required to submit a written statement of that owner's or occupier's interest to the Commission through the respective Metropolitan/Municipal/District Assembly within **Twenty-One (21)** days from the date of publication of this notice in the Gazette. A copy of the statement should be sent directly to: The Chief Executive Officer, Minerals Commission, P.O. Box M248, Accra.

Serial No.	Small Scale Mining Designated Area	Size (km ²)	Location	Min Com SSM Centre	District	Region	Map Ref
1	Domenase	46.41	Domenase	Dunkwa	Amansie central & obuasi Municipal	Ashanti	SSBL 097
2	Akasu	49.98	Akasu	Dunkwa	Adansi South, Amansie central, Obuasi Municipal	Ashanti	SSBL 098
3	Ntotoroso	10.18	Ntotoroso	Bibiani	Asutifi South & Asutifi North	Ahafo	SSBL 099

(MARTIN K. AYISI)
DEPUTY CHIEF EXECUTIVE OFFICER
FOR: CHIEF EXECUTIVE OFFICER



2042

GHANA GAZETTE, 18TH JUNE, 2019

The situation in 2018 was even crazier.

In March 2018 alone, roughly 670 square kilometers, or 165,500 acres, of concessions were designated by the Minister in charge for small-scale mining.

MINERAL RIGHTS APPLICATIONS BULLETIN

Minerals and Mining (Licensing) Regulations, 2012 (L.I.2176)

FORM 6

[Regulation 10(1), 94(1), 177(1), 207(1)]

The under-listed persons have applied for mineral rights to conduct mineral operations as provided in the schedule below. An owner or lawful occupier who is likely to be affected by the grant of the mineral right is hereby required to submit a written statement of that owner's or occupier's interest to the Commission through the respective Metropolitan/Municipal/District Assembly within **Twenty-One (21)** days from the date of publication of this notice in the Gazette. A copy of the statement should be sent directly to: The Chief Executive Officer, Minerals Commission, P.O. Box M248, Accra.

Serial No.	Small Scale Mining Designated Area	Size (km ²)	Location	Min Com SSM Centre	District	Region	Map Ref
1.	Abodom	7.22	Abodom	Dunkwa	Amansie West	Ashanti	SSBL 001
2.	D.C.B Oda River 1	17.17	Odahu	Dunkwa	Amansie West	Ashanti	SSBL 002
3.	D.C.B Oda River 2	47.69	Hu	Dunkwa	Amansie West Amansie Central	Ashanti	SSBL 003
4.	D.C.B. Afigya North	93.66	Afiefiso	Dunkwa	Amansie West Atwima Mponua Upper Denkyira West	Ashanti Central	SSBL 004

5.	D.C.B. Afigya South	69.40	Afiefiso	Dunkwa	Amansie West Upper Denkyira West	Ashanti Central	SSBL 005
6.	D.C.B Dunkwa	121.8	Dunkwa	Dunkwa	Amansie West Upper Denkyira West Upper Denkyira East Adansi South	Ashanti Central	SSBL 006
7.	Edwenase Nkronua	5.65	Edwenase	Dunkwa	Amansie West Upper Denkyira West Sefwi Bibiani - Anhwiaso Bekwai	Ashanti Western Central	SSBL 007
8.	Edwinase	0.68	Edwinase	Dunkwa	Bekwai Municipal	Ashanti	SSBL 008
9.	Gyapa	80.63	Gyapa	Dunkwa	Wassa Amenfi East	Western	SSBL 009
10.	Gyimisokakraba	15.56	Gyimisokakraba	Dunkwa	Obuasi Municipal	Ashanti	SSBL 010
11.	Gyakobu	28.79	Gyakobu	Dunkwa	Bekwai Municipal Amansie Central	Ashanti	SSBL 011
12.	Kansare	12.68	Kansare	Dunkwa	Bekwai Municipal Amansie Central Adansi North	Ashanti	SSBL 012
13.	Konyaw	5.40	Konyaw	Dunkwa	Bekwai Municipal	Ashanti	SSBL 013
14.	Manso Asumengya	1.94	Manso Nkwanta	Dunkwa	Amansie West	Ashanti	SSBL 014

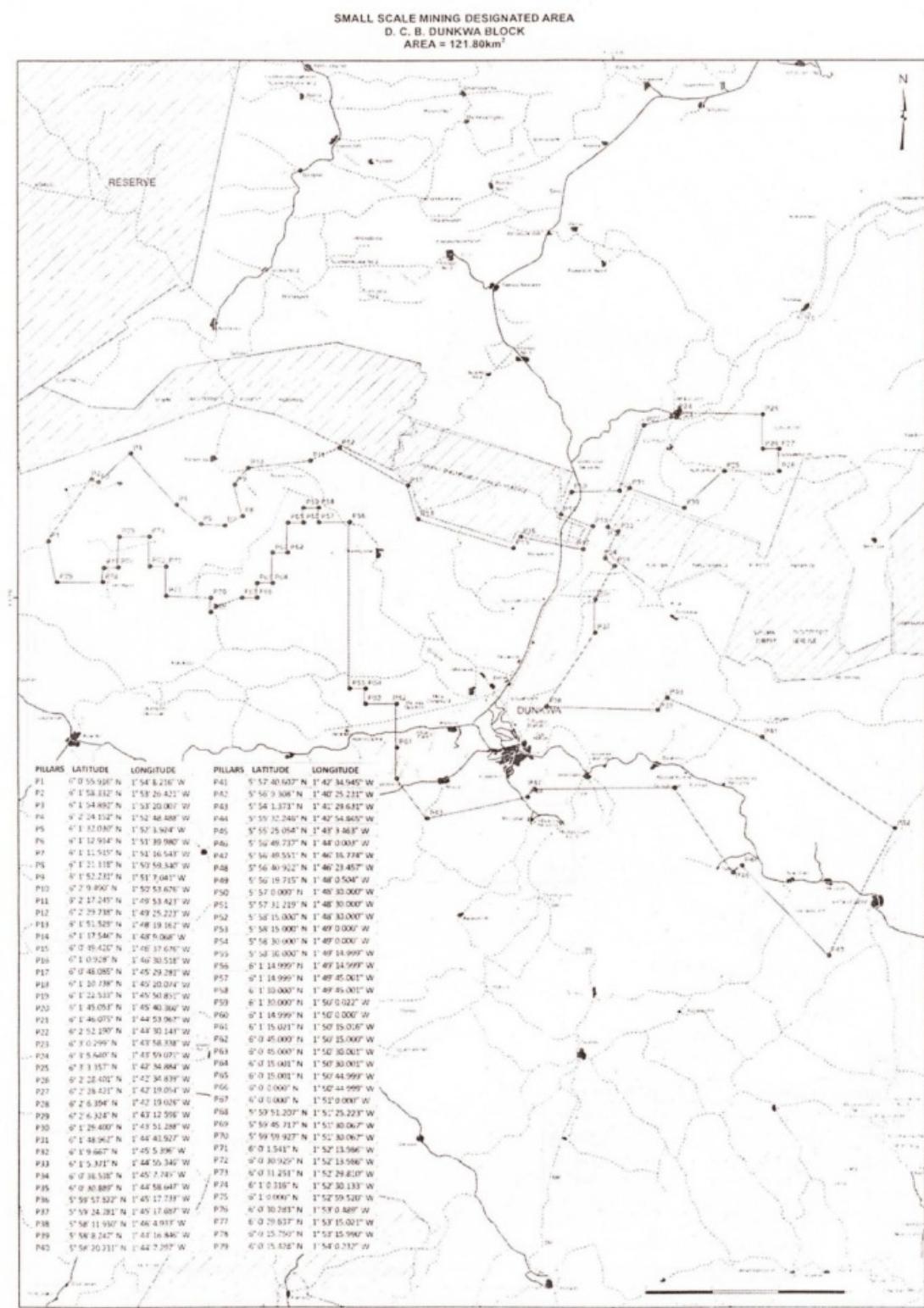
15.	Nanakaw	7.07	Nanakaw	Dunkwa	Wassa Amenfi East	Western	SSBL 015
16.	Okumpreko Kuhyea	76.40	Kuhyea	Dunkwa	Assin North Adansi South	Central Ashanti	SSBL 016
17.	Okumpreko Nyaduom	61.55	Nyaduom	Dunkwa	Adansi South Assin North Upper Denkyira East	Ashanti Central	SSBL 017
18.	Suntreso	5.50	Suntreso	Dunkwa	Amansie West	Ashanti	SSBL 018


 (ADDAE ANTWI-BOASIAKO)
 CHIEF EXECUTIVE OFFICER

Now, here is the real problem. Small-scale mining leases are not published individually in the gazette. The Minerals Commission merely publishes the designated blocks. To infer how many leases are involved, you need to do some arithmetic.

The law caps the acreage assignable to a small-scale mining licensee at 25 acres. Hence, the inferred number of leases from the land designated for small-scale mining in March 2018 would be **at least 6600!**

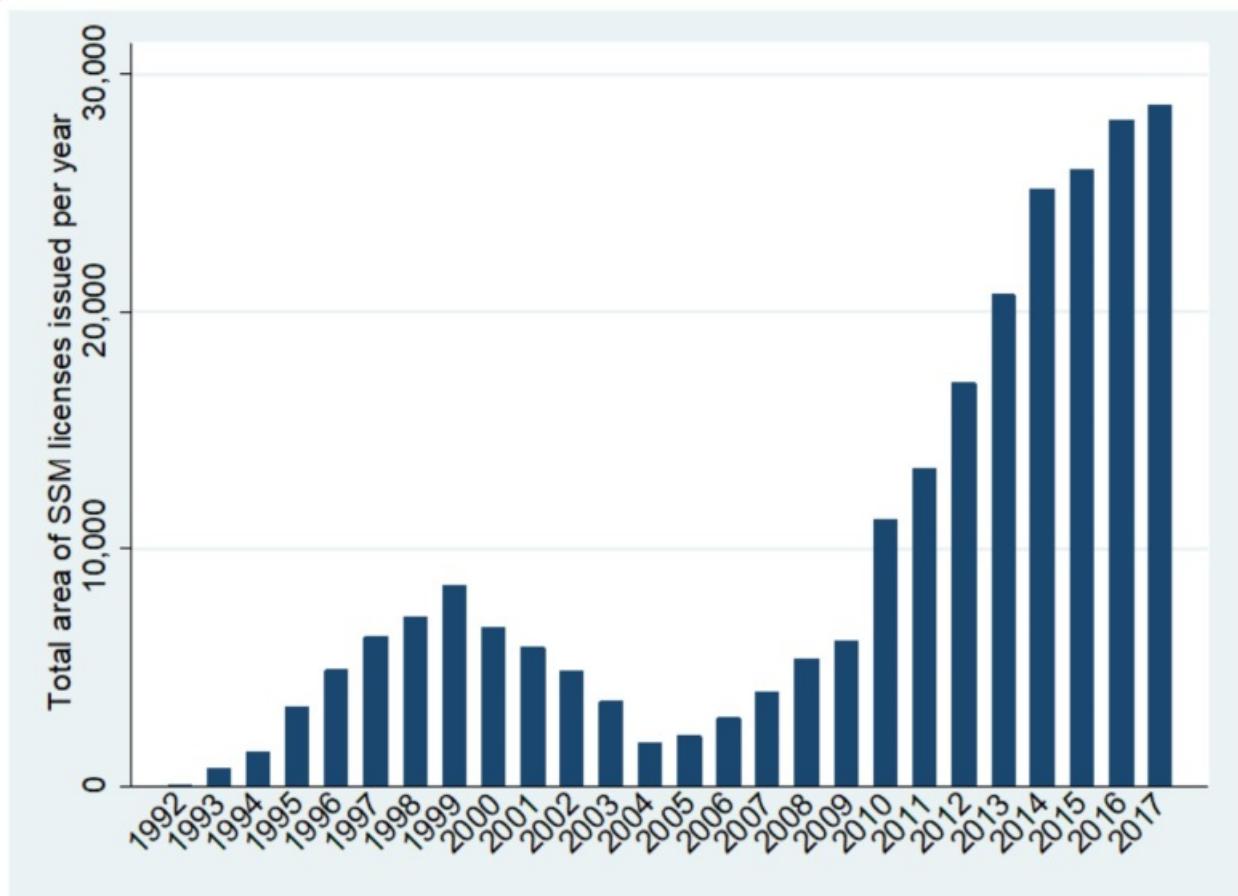
The Dunkwa block alone should be able to accommodate **1200 small-scale mining licenses.**



If the reader has been paying attention, the befuddlement must be overwhelming by now.

How come in a year when small-scale mining was supposedly banned, more implied small-scale licenses were anticipated for issuance **in a single gazette notification** than have ever been issued for small scale mining since 1988, just before small-scale mining was legalised? That actually doesn't do the issue justice.

Look at the chart below by Martin Guenther, formerly a researcher at the University of London.



Simple inspection should tell the reader that the amount of land designated in March 2018 for small-scale mining was equivalent to all the land allocated between 2010 and 2017. The reader would also notice the significant variance between what the government reported to the international organisations and what this researcher found by tallying the actual concession acreage.

Yes, that's right, nothing adds up

And, yet, as I have mentioned several times already, small-scale mining was banned between February 2017 and December 2018.

In fact, according to the Minerals Commission data making the rounds, only 7 small-scale mining licenses were issued in 2017 and **NONE** in 2018.

And, yet, 2018 was also the year that saw the highest small-scale gold production in Ghana's history – ~2 million ounces! Miracles are real!

The next government should take this seriously

It clearly would not be hyperbole to suggest that the new government would need to thoroughly examine the stock of small-scale licenses in the country by, if practical, requiring re-registration and validation.

There is already huge concern about the "[beneficial ownership](#)" of natural resource concessions in Ghana that GHEITI and others are trying to get a handle on. That is to say that there have been persistent claims of politically exposed persons amassing concessions and using fronts to disguise their ownership and/or control.

The head of an interministerial body set up to fight the illegal mining canker in 2017 [accused](#) some board members of the Minerals Commission of selling concessions to illegal miners. The allegations were never properly investigated, nor were the results of any

inquiries shared with the public.

It bears emphasising that the practice has been to pack the board of the Minerals Commission with politicians even though it is meant to be an independent, scientific, organisation.

From the short discussion above, it should be absolutely clear to all readers that the problems of transparency, accountability, anti-corruption, and sound governance, in the mining sector must start with a serious sanitisation of the Minerals Commission.

However, that cannot happen if the country can't even agree on the basic data of what really is happening on the ground.