



Fisheries  
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Initiative

# TAKING STOCK

Online Transparency of  
Fisheries Management  
Information



Republic of  
Ghana

In collaboration with:



**MARITIME**  
LAW & SECURITY  
Pioneering Maritime Governance in Africa

2023 Detailed Assessment Report

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Every effort has been made to verify the accuracy of the information contained in this assessment. All information was believed to be correct as of March 2023. Nevertheless, the Fisheries Transparency Initiative (FiTI) cannot accept responsibility for the consequences resulting from the use of this assessment or its contents by others.

Furthermore, in conducting this assessment, the FiTI did not investigate the veracity or completeness of the published information and did not make any judgement about the integrity of the information or practices disclosed.

We would like to thank all the individuals and institutions who contributed to the various stages of research and preparation of this assessment.

The [Fisheries Transparency Initiative \(FiTI\)](https://www.fiti.global) is a global multi-stakeholder partnership that strengthens transparency and collaboration in marine fisheries management.

By making fisheries management more transparent and inclusive, the FiTI promotes informed public debates on fisheries policies and supports the long-term contribution of the sector to national economies and the well-being of citizens and businesses that depend on a healthy marine environment.



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## **TAKING STOCK: Online Transparency of Fisheries Management Information**

assesses the level of information that Ghana's national authorities publish on government websites regarding the country's marine fisheries sector.

### **Ghana's 2023 TAKING STOCK: Online Transparency of Fisheries Management Information assessment**

consists of this Detailed Assessment Report, as well as a comprehensive Summary Assessment Report.

Both reports, as well as information on the methodology, can be found at:

[www.fiti.global/taking-stock](http://www.fiti.global/taking-stock)

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## ABBREVIATIONS

CECAF	Fishery Committee for the Eastern Central Atlantic
CHRAJ	Commission on Human Rights and Administrative Justice
EEZ	Exclusive Economic Zone
EITI	Extractives Industries Transparency Initiative
EJF	Environmental Justice Foundation
EU	European Union
FAO	Food and Agriculture Organization of the United Nations
FATF	Financial Action Task Force
FiTI	Fisheries Transparency Initiative
IATI	International Aid Transparency Initiative
ILO	International Labour Organization
IUU fishing	Illegal, Unregulated and Unreported fishing
MoFAD	Ministry of Fisheries and Aquaculture Development
NGO	Non-Governmental Organisation
NLC	National Labour Commission
NOK	Norwegian Krone
NTC	National Tripartite Committee
OGP	Open Government Partnership
RGD	Registrar-General's Department
RTI	Right to Information
UN	United Nations
USAID	US International Agency for International Development
USD	United States Dollar

# DIGITAL LANDSCAPE OF GHANA'S MARINE FISHERIES SECTOR <sup>1</sup>

## NATIONAL STRATEGIES FOR OPEN GOVERNMENT

Ghana's constitution, formalised in 1992, recognises the right of all citizens to have access to information (Art. 21(1) F). Led by the Institute for Economic Affairs, a draft Bill on access to information was presented to parliament in 1999. However, it was not until 2019 that this Bill was passed into law, known as the **Right to Information (RTI) Act**.<sup>2</sup> Within this act are obligations for the government to ensure transparency and the establishment of a Right To Information Commission, which was formally created in 2021.<sup>3</sup> Although an important achievement to advance transparency, the RTI Act contains some restrictions to the public's right to access information held by public authorities. It therefore does not perform well on best practice standards for freedom of information laws, such as the Right to Information Ratings.<sup>4</sup>

The RTI Act applies to all public institutions, and therefore covers the government's fisheries management organisations. A manual describing how the RTI Act is implemented by the Ministry of Fisheries and Aquaculture Development (MoFAD) is also published by the ministry on its website. However, this lacks detail on what specific information on fisheries should be published online.

Ghana was also one of the earliest supporters of the **Open Government Partnership (OGP)**, having signed on to this initiative in 2011. Since then, it has published 4 Action Plans, with the latest published in October 2021.<sup>5</sup> This plan covers multiple targets and activities, at both a general national level and for specific sectors, including mining. However, marine fisheries have yet to receive a specific focus of Ghana's work on the OGP.

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<sup>1</sup> This section is intended to provide a brief introduction to the overarching framework through which Ghana's government facilitates public access to information about its marine fisheries sector, and should not be considered an exhaustive source covering every effort, channel and stakeholder contributing to this process.

<sup>2</sup> The Act is available through the online library provided by the Ghana Legal Library Services: [http://elibrary.jsg.gov.gh/fg/laws%20of%20ghana/2%20REP/RIGHT%20TO%20INFORMATION%20ACT.%202019.%20\(ACT%20989\).htm](http://elibrary.jsg.gov.gh/fg/laws%20of%20ghana/2%20REP/RIGHT%20TO%20INFORMATION%20ACT.%202019.%20(ACT%20989).htm)

<sup>3</sup> The website of the Right to Information Commission is: <https://rtic.gov.gh>

<sup>4</sup> For an indent assessment of Ghana's laws, see: <https://www.rti-rating.org>

<sup>5</sup> Available at: [https://www.opengovpartnership.org/wp-content/uploads/2021/10/Ghana\\_Action-Plan\\_2021-2023.pdf](https://www.opengovpartnership.org/wp-content/uploads/2021/10/Ghana_Action-Plan_2021-2023.pdf)

Efforts to improve transparency in the fisheries sector have also been initiated by programmes supported by international donors. Most notably, in 2012 Ghana's was included in the **West Africa Regional Fisheries Programme** of the World Bank. Approximately USD 50 million was provided for a programme of fisheries development and reform in Ghana, which included a component to assist MoFAD to upgrade its online information of fishery statistics, including information on the licensing of industrial fishing vessels. Having received a two-year extension, this project was brought to an early conclusion in 2019 due to Ghana being in breach of legal agreements to limit industrial fishing activity. Subsequently, the Norwegian government signed an agreement with the Government of Ghana in June 2019 for a five-year project under its **Fish for Development** programme. This has a budget for fisheries development in Ghana of NOK 50 million, and a key component of this spending will be to assist MoFAD in collating data and improving communications.<sup>6</sup>

In 2014, a USAID grant of USD 24 million was awarded to the University of Rhode Island to implement the **Sustainable Fisheries Management Project** in Ghana in collaboration with the Ghanaian government. A notable activity of this project with regards to transparency was the compilation of an annotated bibliography on Ghana's fisheries sector, including reports produced by MoFAD. This bibliography is available online through the project's website, although a technical problem with the website results in users being warned of a security risk in accessing documents. However, a secure link to this archive was provided by the project team for this assessment.<sup>7</sup> The Sustainable Fisheries Management Project ended in 2021. Subsequently USAID provided a grant of USD 18 million for a five-year follow-on project, which forms part of its **'Feed the Future'** programme.<sup>8</sup> In Ghana the project is entitled the Ghana Fisheries Recovery Activity. It has been confirmed by staff involved in this project that the bibliography will not be maintained.

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<sup>6</sup> See: [https://www.norad.no/globalassets/publikasjoner/publikasjoner-2020/fish-for-developement\\_annual-report-2019.pdf](https://www.norad.no/globalassets/publikasjoner/publikasjoner-2020/fish-for-developement_annual-report-2019.pdf)

<sup>7</sup> [https://www.crc.uri.edu/download/GH2014\\_COM110\\_CRC\\_FIN508.pdf](https://www.crc.uri.edu/download/GH2014_COM110_CRC_FIN508.pdf)

<sup>8</sup> No website could be found for this project, but programme documents are published online including by USAID, i.e. [https://pdf.usaid.gov/pdf\\_docs/PA00XRTP.pdf](https://pdf.usaid.gov/pdf_docs/PA00XRTP.pdf)

## NATIONAL FISHERIES AUTHORITIES

Ghana's Fisheries Act 625 of 2002 established a **Fisheries Commission** that was the central government agency to manage fisheries.<sup>9</sup> In 2005, the government established the dedicated Ministry for Fisheries, known as the Ministry of Fisheries and Aquaculture Development (MoFAD). This was dissolved in 2009 and reinstated in 2013. The Ministry has been designated as having the overall responsibility for fisheries management and policy development, while the Fisheries Commission was reconceptualised as the operational agency. The relationship and respective roles and responsibilities of the MoFAD and the Commission is somewhat hard to understand (which extends to the responsibility for publishing information). The Commission has a

separate budget to the MoFAD and has the authority to raise additional revenues. The Commission also has its own governing board, including representatives of seven government organisations, one representative from the industrial fishing sector and one from the artisanal sector.

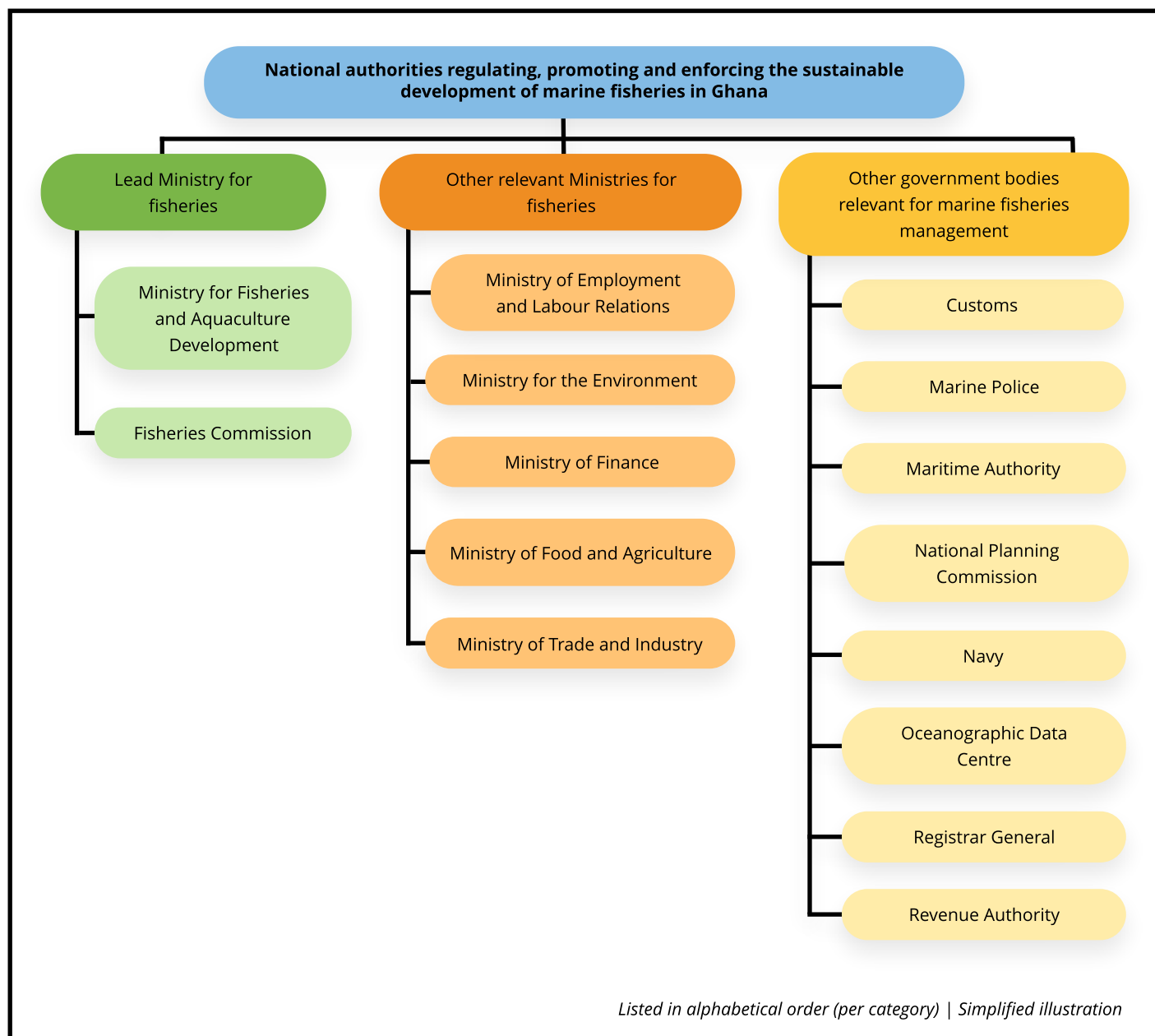
In addition to the MoFAD and the Fisheries Commission, other Ministries as well as several government organisations have responsibility relating to the management of marine fisheries as shown below.

Parliamentary oversight of the MoFAD is designated to the Parliamentary Select Committee on Food, Agriculture and Cocoa Affairs.

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<sup>9</sup> The Fisheries Act 625 does not only apply to marine fisheries, but also to inland fisheries, including aquaculture.





## GOVERNMENT WEBSITES AND NOTABLE REPORTS

Within the scope of this assessment performed between November 2022 and March 2023, several different entry points have been utilised to evaluate whether information on Ghana's marine fisheries sector is published online by national authorities.

Although the government of Ghana has launched a central portal for accessing all government information, [www.ghana.gov.gh](http://www.ghana.gov.gh), this portal contains no information on fisheries. Instead, links to the website of the Fisheries Commission are provided.

## CENTRAL GOVERNMENT PORTAL(S) IN GHANA

Ghana's Digital Services and Payments Platform	<a href="https://www.ghana.gov.gh">https://www.ghana.gov.gh</a>
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**The website of the Fisheries Commission and the separate website of the MoFAD were therefore considered to be the primary**

**sources of government information on the marine fisheries sector.**

## WEBSITES OF GHANA'S NATIONAL AUTHORITIES FOR MARINE FISHERIES MANAGEMENT

Ministry of Fisheries and Aquaculture Development	<a href="https://www.mofad.gov.gh/">https://www.mofad.gov.gh/</a>
Fisheries Commission	<a href="https://fishcom.gov.gh/">https://fishcom.gov.gh/</a>

It is shown in this assessment that both websites of the Fisheries Commission and of the MoFAD provide limited information. This is somewhat surprising as modernising the website of MoFAD,

including a dashboard of statistical information, was considered a key activity and achievement of the World Bank financed project that ended in 2019.<sup>10</sup>

## WEBSITES OF SUPPORTING PUBLIC SECTOR INSTITUTIONS RELEVANT FOR GHANA'S MARINE FISHERIES SECTOR

Ministry of Finance	<a href="https://mofep.gov.gh">https://mofep.gov.gh</a>
Judicial Services of Ghana	<a href="http://elibrary.jsg.gov.gh">http://elibrary.jsg.gov.gh</a>
Parliament of Ghana	<a href="https://www.parliament.gh">https://www.parliament.gh</a>
Registrar General's Department	<a href="https://rgd.gov.gh">https://rgd.gov.gh</a>

A useful resource for this assessment were the annual reports on budget allocations made by the Parliamentary Select Committee on Food, Agriculture and Cocoa Affairs. These provide a good overview of the delivery of planned

activities of the MoFAD as well as an overview of budget allocations and expenditures. Additionally, a recent medium-term performance review produced by the Ministry of Finance provides similar information.<sup>11</sup>

<sup>10</sup> See page 58: <https://documents1.worldbank.org/curated/en/866911554409721545/pdf/Ghana-Under-the-First-Phase-of-the-West-Africa-Regional-Fisheries-Program-Project.pdf>

<sup>11</sup> There are inconsistent reports on MoFAD issued by the Ministry of Finance. However, a recent report found for this assessment was entitled the 'Medium Term Expenditure Framework for 2022-2025: Ministry of Fisheries and Aquatic Development', available at: <https://mofep.gov.gh/sites/default/files/pbb-estimates/2022/2022-PBB-MoFAD.pdf>

Both **the Fisheries Commission and the MoFAD do not publish an annual report online**. There is evidence that the Fisheries Commission has produced annual reports in the past, although these have been published in hard copies only.<sup>12</sup> Our assessment was unable to obtain copies of such reports. It is also noteworthy that according to review reports issued by the Ministry of Finance, the MoFAD does submit quarterly and annual reports on expenditures and the meeting of policy targets. However, these reports cannot be found online.

The National Development Planning Commission has produced a report on progress for the MoFAD in delivering on its objectives and targets, however this has been achieved for only one year (2020), and previous/subsequent yearly reports

cannot be found.<sup>13</sup> A national **Fisheries Management Plan**, which are produced every five-years, provides policy objectives and summary information on the marine fisheries sector. However, the most recent plan, finalised in March 2022, has not been published online and awaits parliamentary approval.

In addition, there is an extensive literature on the management of Ghana's fisheries provided by academia, independent national and international research institutes and NGOs, as well as reports commissioned by international organisations, including the World Bank, the United Nations, USAID and the African Development Bank. These have been used in this assessment to verify if government information is collated and what gaps exist.

## **ADDITIONAL GOVERNMENT OUTREACH AND COMMUNICATION ACTIVITIES**

- **Fisher to Fisher Dialogues:** This is an initiative that the government uses to share information among artisanal fishers and solicit fishers' input on various government policies.
- **MoFAD Facebook page:** The ministry has a Facebook page which it uses to disseminate selected fisheries information to the general public.

Although this assessment is restricted to a review of information published online by the

authorities in Ghana, it is recognised that this is not the only way information is shared with the public.

It should also be recognised that local civil society organisations and donors have played a prominent role in Ghana for organising participation between fishers and the government. This does provide an important pathway for increasing the dissemination of government information.

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<sup>12</sup> Information from past annual reports is referenced in some literature on Ghana's fisheries. See for example Doku, B., et al., (2018) 'Fisheries resource of Ghana: present status and future directions', International Journal of Fisheries and Aquatic Research, Vol 3(1), see reference 2 for the MoFAD Annual report of 2018. [https://www.researchgate.net/profile/Bortey-Alabi-Doku/publication/333566631\\_Fisheries\\_resources\\_of\\_Ghana\\_present\\_status\\_and\\_future\\_direction/links/5cfbd36d92851c874c59470f/Fisheries-resources-of-Ghana-present-status-and-future-direction.pdf](https://www.researchgate.net/profile/Bortey-Alabi-Doku/publication/333566631_Fisheries_resources_of_Ghana_present_status_and_future_direction/links/5cfbd36d92851c874c59470f/Fisheries-resources-of-Ghana-present-status-and-future-direction.pdf)

<sup>13</sup> Retrieved from: <https://ndpc.gov.gh>

# DETAILED ASSESSMENT OF ONLINE TRANSPARENCY OF FISHERIES MANAGEMENT INFORMATION IN GHANA

This **TAKING STOCK: Online Transparency of Fisheries Management Information** assessment evaluates and documents whether specific information relating to marine fisheries management is published online by government authorities.<sup>14</sup> Only information published by government authorities is considered within the scope of this assessment, although information published by third parties is assessed to check whether government information is available at all, is up to date and is a true reflection of current government policies and activities.

This assessment covers 12 thematic areas of fisheries management, as defined by the **FiTI Standard**.<sup>15</sup> These 12 thematic areas have been further broken down into a total of 39 transparency elements.

**The following Detailed Assessment Report provides explanations for scorings of all**

**transparency elements.**

It should be emphasised that several transparency elements have been assessed as **'Not applicable'**. This is because the transparency element refers to an aspect of fisheries management that is not relevant to the country.

Additionally, some information has been assessed as **'Not produced'**. This refers to information that is not in the public domain because national authorities have yet to collect or compile the relevant data, which may be due to national authorities targeting different priorities or simply because they do not have the technical, financial or human resources needed to produce such information.<sup>16</sup> For further information about the methodology behind this assessment, please refer to: <https://www.fiti.global/taking-stock/methodology>.

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<sup>14</sup> Information disclosure through government websites and online publications remains critical in achieving transparency. This ensures information is freely available to anyone (including people outside the country), and that information – including historical data – can be accessed at any time.

<sup>15</sup> The FiTI Standard is the only internationally recognised framework that defines what information on fisheries management should be published online by national authorities. The FiTI Standard was developed over two years in a global multi-stakeholder endeavour. Its objective is to contribute to the sustainability of marine fisheries by increasing the accessibility and credibility of national fisheries management information.

<sup>16</sup> In the spirit of one of its key principles, namely – progressive improvement–, the FiTI does not expect all countries to have complete data for every transparency requirement from the beginning. Instead, public authorities must disclose the information they have, and where important gaps exist, demonstrate improvements over time. As such, engaging with the FiTI is not intended to be a burdensome and costly research activity. The FiTI has been designed to ensure that any country can implement it, including those where resources for collating information are limited. In fact, the FiTI may be particularly beneficial in such contexts, as it should support national authorities in their efforts to organize and present information. As this is the first TAKING STOCK assessment of Ghana, transparency requirements for which information is assessed as not yet existent to the government ('Not produced') will therefore not negatively impact the country's overall transparency performance.





# 1. FISHERIES LAWS, REGULATIONS AND OFFICIAL POLICY DOCUMENTS

A public record of the current laws, regulations and policy documents that relate to the management of marine fisheries is critical for ensuring transparency in the sector. Such documents are often, but not always, published by governments in a national gazette. However, transparency is undermined if it is difficult for citizens to locate these documents, which is the case when they are one of many entries in a more general national registry of official documents. To facilitate public access to laws, regulations and policy documents, the relevant public authority responsible for marine fisheries should list the key documents in one place, also providing summary information and dates of publication.

## 1-A | LAWS ON MARINE FISHERIES

Basic information requirements:	Available online?	Up to date? (The latest laws are published)	Easy to find?
Registry of national legislation related to the marine fisheries sector <sup>17</sup>	Partially	Yes	No
	To a limited extent	To a full extent	No

### Available online?

The **primary law** for the management of marine fisheries in Ghana is the **2002 Fisheries Act (Act 625)**. This Act was amended in 2014 (Act 880).

Fishing regulations, which elaborated on aspects of the Fisheries Act, including obligations for obtaining and maintaining a fishing license, were finalized in 2010 and amended in 2015 (Fisheries (amendment) Regulations, L.I. 2217).

<sup>17</sup> This assessment does not cover legislations at the sub-national level.

In several reports it is stated that the government have drafted a new Fisheries Act, with a draft of this new Act completed by 2019. The drafting of the Act is listed as a key achievement of the World Bank's project in Ghana.<sup>18</sup> However, the draft has not been completed and remains stalled. This assessment was not able to find a version of this draft Act online.

At a lower level to Acts and regulations are **ministerial directives, orders and notices**. An example of this is the directive issued by the MoFAD for the implementation of a closed season for industrial trawlers, issued in 2016. Further examples include more recent directives relating to closed fishing seasons, and changes to permitted fishing gears.

On the homepage of the MoFAD's website is a link provided to pages of information 'legislations' (under 'publications'). However, the 2002 Fisheries Act is not listed here and nor are other prominent regulations and ministerial directives/orders/notices. There are only two entries, one of which relates to the Right to Information Act and the other is a link to a government notice on minimum sanitary requirements for tuna fishing vessels.

The MoFAD does publish scanned copies of the 2002 Fisheries Act, its amendment and the 2010

Fisheries regulations, and the amendment in 2015. However, these 4 documents are not linked to any navigational menu. They are therefore found only through a google search. There are anomalies to both the documents uploaded to the website of the MoFAD on the fisheries regulations. The 2015 regulations document is incomplete as the scan of the regulations is missing several pages: all even numbered pages are missing.<sup>19</sup> The 2010 regulations uploaded to the website of the MoFAD is a draft of the text dated 2009.<sup>20</sup> Although the text between the 2009 draft and the 2010 finalized version is very similar, there are some differences.<sup>21</sup> The MoFAD therefore do not provide a complete registry of the main laws and regulations for the fisheries sector.

On the website of the **Fisheries Commission**, there is a dedicated page for laws and regulations. This is found under the 'resources' link from the homepage. This only provides a link to the 2002 Fisheries Act, and no links to further laws and regulations are provided.

The website of the **Parliament of Ghana** has a link to Acts of parliament, bills and legislations. However, retrieving relevant documents for fisheries was unsuccessful. The search function of this website does not seem to work (zero results for 'fish'). Also, the archives of the records do not contain the 2002 Fisheries Act.<sup>22</sup>

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<sup>18</sup> See page 57: <https://documents1.worldbank.org/curated/en/866911554409721545/pdf/Ghana-Under-the-First-Phase-of-the-West-Africa-Regional-Fisheries-Program-Project.pdf>

<sup>19</sup> <http://MoFAD.gov.gh/wp-content/uploads/2016/07/FISHERIES-AMENDMENT-REGULATIONS-2015.pdf>

<sup>20</sup> <https://www.MoFAD.gov.gh/wp-content/uploads/2016/05/Fisheries-Regulations-2010.pdf>

<sup>21</sup> For example, there are 82 subheadings to the draft version, and 79 in the finalized one.

<sup>22</sup> <https://www.parliament.gh/docs?type=Acts&yr=&mon=&OT&filter=A>

The Judicial Service of Ghana has a registry of laws, which includes the 2002 Fisheries Act, but not the laws amending this Act.<sup>23</sup> This site also does not provide a copy of the regulations.

Our assessment was able to find a government website with a complete list of fisheries legislation. This is provided by the **Ghana Business Regulatory Reforms Portal**, a project instigated by the Ministry for Trade and Industry.<sup>24</sup> This is an initiative which aims to provide the public with access to information on business regulations and to establish a platform for public input to proposed policies and legislation, to be uploaded by ministries. On this website, under the 'browse regulations' menu, fisheries has a distinct sector heading. This leads to a registry of relevant Acts and Regulations, which is complete.

While the main laws and regulations on fisheries

are therefore published by the government, this assessment could not locate **a comprehensive record of ministerial directives, orders or other notices**. A page on the website of the MoFAD was located (by chance via a google search), which was the scanned copy of a Ministerial Directive of 2016.<sup>25</sup> However, more recent directives, such as on fee changes for licensing, could not be found. A section of the Ghana Business Regulatory Reforms Portal is devoted to administrative directives and regulatory notices, but there are no entries regarding fisheries. The use of Ministerial directives, orders and notices in Ghana appear to be important in the governance of marine fisheries. Therefore, the absence of these documents means this assessment considers the availability of a national registry of laws and regulations to be only partially available online.

## Up to date?

The available published information on laws and regulations is up to date.

## Easy to find?

Locating the documents of the Fisheries Act (and amendments) and the Fisheries Regulations (and amendments) is considered

difficult. This is primarily due to the failure of the MoFAD to list these documents on the website where members of the public are most likely to

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<sup>23</sup> <http://elibrary.jsjg.gov.gh/fg/laws%20of%20ghana/table%20of%20acts.htm>

<sup>24</sup> <https://www.bcp.gov.gh/new/index.php>

<sup>25</sup> <https://MoFAD.gov.gh/wp-content/uploads/2016/06/MINISTERIAL-DIRECTIVE.pdf>

look.

Furthermore, Ghana's official gazette is not published online by the government: it is

available in hard copy only.<sup>26</sup> The central portal of government information, '[ghana.gov.gh](http://ghana.gov.gh)', does not publish laws and regulations either.

## 1-B | FISHERIES POLICY DOCUMENTS<sup>27</sup>

Basic information requirements:	Available online?	Up to date? (The latest policy documents are published)	Easy to find?
Comprehensive list of national policy documents	No		
No			

### Available online?

National policies for fisheries development are set out in the government's flagship five-year **National Development Policy Framework**. This is produced under the auspices of the National Planning Commission. In the most recent five-year policy framework, spanning 2022 to 2025, the objectives and policies for the marine fisheries sector are included.<sup>28</sup> However, fisheries policies in this document remain at a

somewhat general level.

In addition to the National Development Policy Framework, the MoFAD also produces its own policy documents. According to sources in Ghana, a new **Fisheries and Aquaculture Policy** was recently approved by parliament, however hard copies of this have not been produced and there are no electronic copies available.

<sup>26</sup> This is published by the Ghana Publishing Company: <https://www.ghanapublishing.com/index.php/services>

<sup>27</sup> Fisheries policy documents are defined in the broadest sense as the accumulation of documents and instruments regulating the sector. A policy document includes a national strategy for fisheries development. These may be produced as standalone documents exclusively for fisheries, or fisheries may be included as one sector of a broader policy, e.g. on the marine environment, agriculture and trade etc. Governments may produce multiple policy documents on fisheries development targeting different sub-sectors or thematic areas. For this assessment, policy documents are distinguished from fisheries management plans, which are time-bound strategies relating to the management of a specific fishery. These are assessed separately.

<sup>28</sup> [https://ndpc.gov.gh/media/MTNDPF\\_2022-2025\\_Dec-2021.pdf](https://ndpc.gov.gh/media/MTNDPF_2022-2025_Dec-2021.pdf)



Another important document is the **five-year national fisheries management plan** (which is considered a national policy document, see also 1-C). As described via a press release issued by the MoFAD, the most recent plan was finalised in March 2022, which updated the previous plan covering the years 2015 to 2019.<sup>29</sup> The gap of two years when there was no active plan is explained by the government as being caused by the COVID-19 pandemic.

**The latest fisheries management plan is not published by the government and cannot be found on the internet.**

This is most likely because it has yet to be formally endorsed by parliament, although it is uncertain if policy documents such as this one requires parliamentary approval. The previous fisheries management plan is published on the website of the MoFAD; however, this was only found by chance through an external search (e.g. using Google).<sup>30</sup> There are no relevant pages on the MoFAD website for policies. On the Fisheries Commission's website, there is a page entitled 'reports and plans', but **this page is blank**.

It should be noted that in the last fisheries management plan a requirement for the

Fisheries Commission is to provide annual reports on the progress in the implementation of the plan. These annual reports could also not be found online.

A list of policy documents relating to marine fisheries is provided by the Sustainable Fisheries Management Project.<sup>31</sup> This contains several important government policy documents, relating to co-management, illegal fishing, the development of artisanal fisheries, efforts to address child labour in the fisheries sector and the promotion of women in the fisheries sector. These reports are not published on the website of the MoFAD, even though the documents are credited as publications produced by the Ministry.<sup>32</sup>

Overall, our assessment therefore judged that **there is no comprehensive list of policy documents for marine fisheries provided by the government of Ghana**. Several policy documents can be located through the websites of other organisations, notably the digital archives produced by the Sustainable Fisheries Management Project, but the last fisheries management plan, which is now active, is not publicly available anywhere.

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<sup>29</sup> <https://www.mofad.gov.gh/press-release/2022-2026-marine-fisheries-management-plan-validated/#:~:text=2022-2026%20MARINE%20FISHERIES%20MANAGEMENT%20PLAN%20VALIDATED,->

<sup>30</sup> <https://mofad.gov.gh/wp-content/uploads/2016/07/FISHERIES-MANAGEMENT-PLAN-OF-GHANA.pdf>

<sup>31</sup> [https://www.crc.uri.edu/download/GH2014\\_POL114\\_CRC\\_FIN508.pdf](https://www.crc.uri.edu/download/GH2014_POL114_CRC_FIN508.pdf)

<sup>32</sup> An example is the com-management policy produced by the MoFAD, which is only available through the website of the SFMP: [https://www.crc.uri.edu/download/GH2014\\_POL112\\_MoFAD\\_FIN508.pdf](https://www.crc.uri.edu/download/GH2014_POL112_MoFAD_FIN508.pdf)

1-C | FISHERIES MANAGEMENT PLANS<sup>33</sup>

Basic information requirements:	Available online?	Up to date? <i>(The latest fisheries management plans are published)</i>	Easy to find?
Comprehensive list of fisheries management plans	No		
	No		

Available online?

For the assessment of Fisheries Management Plans, our assessment only considers those plans that are focused on a specific fishery. Therefore, Ghana's five-year National Fisheries Management Plan (as shown above, 1-B) has been considered as a national policy document. However, according to the Fisheries Act 2002, fishery plans should be produced by the MoFAD for specific fisheries and/or regions. Part IV of the Act, entitled '**Fisheries management and development**', details what information should

be included in each fishery plan and that these plans should be published in the Official Gazette of Ghana. According to sources in Ghana, some fishery management plans have been produced for selected fisheries, including those in estuaries. There are no records published by the government. Our assessment therefore assumes that such plans exist but have not been published, as opposed to no such plans being produced.

<sup>33</sup> Fisheries management plans are usually produced in consultation with fishers and other stakeholders, setting targets and procedures for the management of the fishery over a designated time frame.



## 2. FISHERIES TENURE ARRANGEMENTS

Fisheries tenure arrangements define how fishing rights are accessed, used, and managed. Tenure in fisheries covers a wide range of scenarios. Fishing rights can be provided on an individual basis (such as through restricted short-term licensing systems), or they can be designated to entire groups (such as when exclusive long-term access to areas of the sea is provided to coastal fishing communities). Official rules on tenure are one of the most critical aspects of sustainable fisheries management because they influence the sector's social, ecological and economic impacts. However, the effectiveness of fisheries tenure arrangements can be undermined by a lack of openness and publicity regarding government rules and procedures. As a result, citizens can suffer from limited insights into how tenures work, who owns fishing rights, and how the benefits and costs of fishing activities are distributed.

Government legislation in Ghana on commercial fisheries distinguishes between industrial, semi-industrial and artisanal fisheries. The categorisation of fishing vessels is important as Ghana has established an Inshore Exclusive Zone that is used only for artisanal and semi-industrial fishing. Both forms of fishing do operate beyond this zone as well.

The concept of semi-industrial fisheries is often interchanged with the concept of 'inshore fisheries'. These vessels are described as being locally built wooden vessels up to 20 meters long, using in-board motors and gears that target both small pelagic fish and bottom dwelling demersal species, depending on the fishing season.

A defining feature of Ghana's approach to fisheries tenure has been the promotion of

**nationally-owned fishing companies within the industrial sector.** This approach was

formalised in the 2002 Fisheries Act.

Foreign-flagged vessels are allowed to fish in Ghanaian waters either under a bilateral fisheries agreement or through private licenses issued by the Minister of the MoFAD. In practice, foreign-flagged vessels (predominantly from Europe) have been restricted to tuna fishing, and Ghana has not entered into a foreign fishing access agreement with the EU or any other country. Authorisations for a nationally-flagged fishing vessel are restricted to fishing companies where the beneficial owner is a Ghanaian citizen. The 2002 Fisheries Act also allows tuna fishing vessels to be categorised as a local fishing vessel if more than 50% of the shares in the company owning the vessel are held by

Ghanaian citizens. In practice, it is well established that foreign-owned companies (predominantly from China) own the majority of locally registered industrial fishing vessels in Ghana, and that their qualification as Ghanaian-owned companies has been achieved through controversial joint venture arrangements with local companies.<sup>34</sup> The Ghana Maritime Authority has the responsibility to verify the legal status of fishing vessels that are entered onto the Ghana registry and subsequently are granted the rights to operate under the Ghanaian flag.

Ghana's approach to tenure in fisheries has previously lacked explicit and formalised systems to limit entry into the commercial fisheries sector. However, in recent times, efforts to reduce fishing pressure have included temporary moratoriums on fishing activities to allow stocks to recover, which have been implemented across all sectors of commercial fisheries. In addition, in 2012 there was a moratorium introduced by the government on new entrants into the industrial fishing sector, which was not respected. Subsequently, MoFAD set a target to reduce the number of industrial fishing vessels operating in the country to 47, as stated in the national fisheries management plan running to 2019.

Targets for licenses issued to industrial fishing vessels are also stated in certain budget documents of the Ministry of Finance.<sup>35</sup> However, these targets have not been enforced. Despite this, in January 2023, the Minister of the MoFAD described in a press statement that of the 76 vessels registered as industrial fishing vessels, only 19 had applied for a license. Owners of the other vessels had been identified as using banned fishing gear and therefore required to demonstrate compliance with the new rules.<sup>36</sup> It is unclear whether vessels will fail to meet the new requirements, and it is assumed most will.

In the case of semi-industrial fisheries. There are currently no government regulations that directly limit the number of vessels and their catches.

Ghana has also committed to fisheries management that follows the principle of **co-management**, i.e. a greater involvement in fisheries decision-making and management by civil society and the fishing industry. However, the **governance of marine fisheries is not decentralised**. Both, the MoFAD and the Fisheries Commission, maintain responsibility for the management of the industry, and there has been little transfer of authority to lower levels of government (e.g. regarding licensing),

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<sup>34</sup> See Environmental Justice Foundation (2021) 'At what cost?: How Ghana is losing out in fishing arrangements with China's distant water fishing fleet': [https://ejfoundation.org/resources/downloads/EJF\\_At-What-Cost\\_-2021\\_final.pdf](https://ejfoundation.org/resources/downloads/EJF_At-What-Cost_-2021_final.pdf)

<sup>35</sup> See page 29 of the 'Medium Term Expenditure Framework for 2022-2025: Ministry of Fisheries and Aquaculture Development', available at: <https://mofep.gov.gh/sites/default/files/pbb-estimates/2022/2022-PBB-MoFAD.pdf>

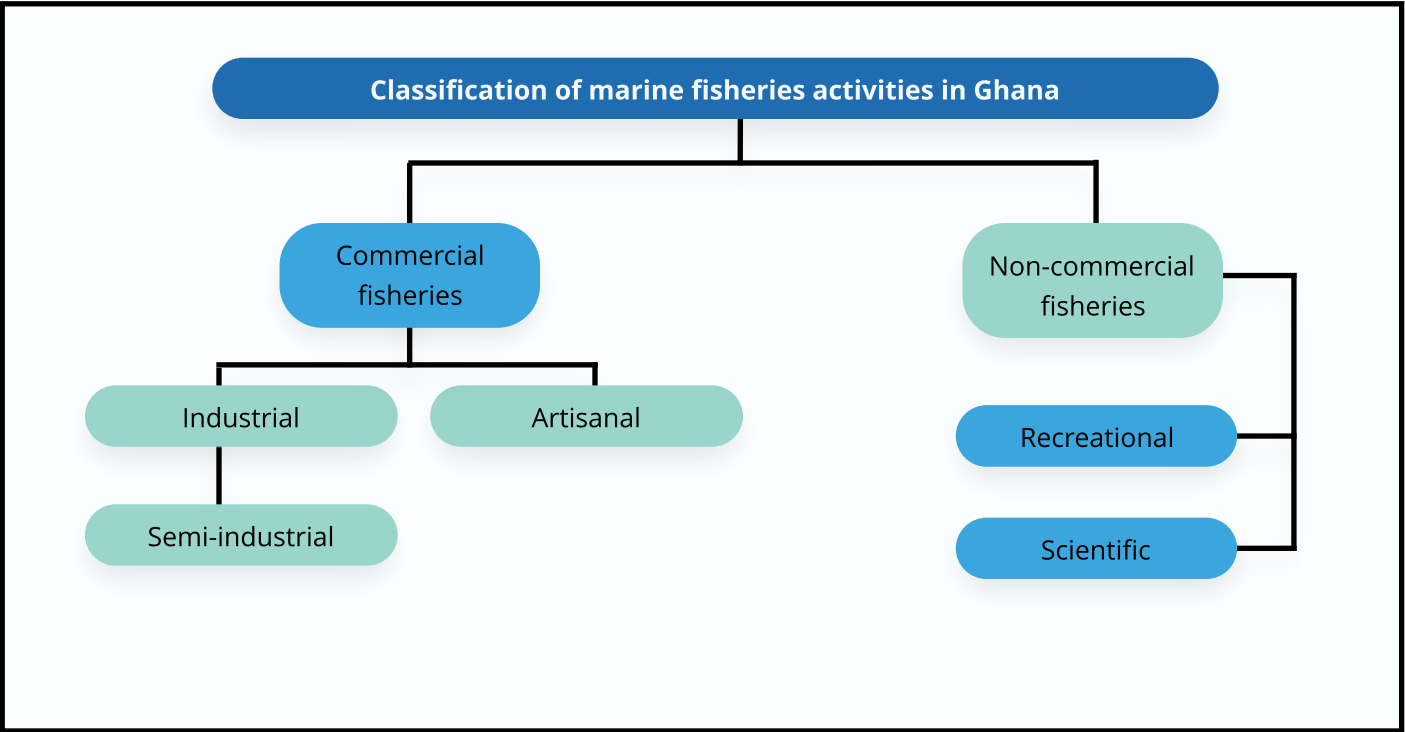
<sup>36</sup> <https://www.myjoyonline.com/only-19-fishing-vessels-cleared-to-fish-under-new-iuu-fishing-measures-hawa-koomson/>



including district authorities.

It should be noted that a failure to publish ministerial declarations and notices (as noted under section 1) means some of the rules for fisheries tenure are hard to establish. This includes the payment of fishing fees and new rules to limit ecosystem impacts. **To improve**

**transparency in fisheries, a comprehensive and easy to read summary of fisheries tenure should be produced by the government, and all ministerial declarations and notices affecting tenure should be published online.**



## 2-A | COMMERCIAL FISHERIES (LARGE-SCALE AND SMALL-SCALE)

Basic information requirements:	Available online?	Up to date? (The latest tenure rules and procedures are published)	Easy to find?
Fees of access rights and fishing authorisations	No		
Duration of such rights and authorisations	Yes	Yes	No
Transferability of such rights and authorisations	Yes	Yes	No
Divisibility of such rights and authorisations	Yes	Yes	No
Authorities/persons that are legally entitled to issue such rights and authorisations	No		
Mandatory administrative procedures required to determine their issue	Yes	Yes	Yes
Conditions relating to fishing effort	No		
Conditions relating to ecosystem impact	No		
Conditions relating to landings	Yes	Yes	No
Conditions relating to transshipping	Yes	Yes	No
Conditions relating to catch reporting	Yes	Yes	No
Procedures and rules for authorising a US-flagged vessel to fish in a third country or on the High Seas	Yes	Yes	No
Provisions for formal mechanisms of external oversight and public consultations of fisheries tenure decisions	No		
	To a large extent	To a full extent	To a limited extent

The 2022 Fisheries Act, its amendments and further regulations provide clear information on all of the above criteria for industrial, semi-industrial and artisanal fisheries. There are, however, some notable gaps.

### Information on fees for fishing licenses

cannot be located on any government websites and online reports. All categories of commercial fishing must purchase a license, and the laws clarify that the decision on the cost of a license is made by the Fisheries Commission. A lack of information on fees includes all three fishing categories, although it is accepted that at the moment there are no fees being applied to the artisanal fishing sector.

Changes to the cost of fishing licenses for industrial fishing vessels has been a source of some controversy. Historically, Ghana has charged a surprisingly low license fee for industrial fishing: USD 35 per gross tonne of the fishing vessel. However, a press statement issued by the government describe this was increased in January 2020 to USD 200.<sup>37</sup> According to the same statement, the decision to change the fees was communicated to the fishing industry via a letter. However, in its report of December 2019, the Parliamentary

Select Committee on Food, Agriculture and Cocoa Affairs described that the MoFAD had indicated the price increase was to be implemented, and the Committee urged the Ministry to achieve parliamentary approval.<sup>38</sup> No further records can be located that indicate this approval was sought or gained.

Media reports describe that fishing industry representatives complained that the increase was too high. Subsequent reports indicate that the fishing license fee was reduced to USD 135.<sup>39</sup> There is, however, no information on the current license fees published online by the government.

The decision to grant licenses to fish is made by a **Fishing License Evaluation Committee** established within the Fisheries Commission. Their findings on an application are forwarded to the Minister for formal approval. However, there is legal dispute surrounding this. The Constitution of Ghana seemingly requires approval by Parliament for the Fisheries Commission to have this power, otherwise all licenses ought to be approved by Ghana's Parliament. It has been argued that there has been no parliamentary agreement that confers this power to the Fisheries Commission.<sup>40</sup>

<sup>37</sup> <https://fcwc-fish.org/other-news/tuna-association-sues-fisheries-ministry-for-increasing-licensing-fees>

<sup>38</sup> [http://ir.parliament.gh/bitstream/handle/123456789/1580/2020\\_01\\_21\\_09\\_22\\_58.pdf?sequence=1&isAllowed=y](http://ir.parliament.gh/bitstream/handle/123456789/1580/2020_01_21_09_22_58.pdf?sequence=1&isAllowed=y)

<sup>39</sup> <http://www.faapa.info/blog/fishing-licensing-fees-increment-affect-industry-ghana-tuna-asserted/>

<sup>40</sup> [https://ejfoundation.org/resources/downloads/Summary\\_legal\\_opinion\\_Parliamentary\\_approval\\_licences\\_Ghana-v3.pdf](https://ejfoundation.org/resources/downloads/Summary_legal_opinion_Parliamentary_approval_licences_Ghana-v3.pdf)

Another view is that the Fisheries Act 625 provides clear authority for the Minister to approve license applications. Additionally, the Fees and Charges (Miscellaneous Provisions) Act, 2018 (Act 983), grants authority to ministries for setting fees. It is expected that the new fisheries Act in Ghana will clarify this situation.

Other gaps in online information regarding the tenure rights of commercial fisheries includes information of **fishing restrictions** and the use of closed seasons. Although it is documented that in recent times such rules have been introduced by the MoFAD, there are limited public online records of these decisions. For example, in a press release issued by the Minister of the MoFAD, it was described that as part of efforts to combat illegal fishing in the industrial sector, vessels were no longer granted a 15% bycatch allowance.<sup>41</sup> Again, our assessment could not find the relevant legislation or Ministerial decree on this bycatch allowance, as well as formal communications from the government that this policy has been revoked, or whether this change in rules is temporary or permanent.

Finally, while the mandatory administrative

procedures for issuing fishing rights is clearly established for industrial and semi-industrial fishing in the relevant laws, there is ambiguity for commercial artisanal fisheries. The section 55 of the 2002 Fisheries Act requires the District assemblies to register and license artisanal fishing canoes. This is further stated in the 2016 District Assembly in the Local Governance Act, which requires artisanal fishing vessels to be registered by the local district authority, and that proof of this registration is required by the Fisheries Commission to issue a license. However, other more recent reports suggest efforts to register artisanal fishing vessels in Ghana have been approached as a voluntary initiative only. Thus, the registration of vessels is a legal requirement, but is not being implemented in practice.

Relevant to this is that efforts to grant owners of artisanal fishing vessels biometric identity cards has been underway by the MoFAD for several years, but the motivation behind this seems to be in regulating access to subsidized fuel.<sup>42</sup> It may not be a condition of issuing fishing licenses, although rules to that effect may be introduced.

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<sup>41</sup> <https://www.myjoyonline.com/only-19-fishing-vessels-cleared-to-fish-under-new-iuu-fishing-measures-hawa-koomson/>

<sup>42</sup> There are multiple media reports regarding this, although this assessment found the information provided in the annual reports of the Parliamentary Select Committee on Food, Agriculture and Cocoa Affairs to be the most detailed.

## Up to date?

Information on tenure rules that is published online is considered up to date. However, there is considerable uncertainty on what the current

rules of tenure are on some aspects, such as bycatch limitations for the industrial fisheries.

## Easy to find?

Most rules on tenure can only be found by reading the text of the 2002 Fisheries Act and its subsequent amendments. Understanding tenure arrangements is therefore a time-consuming exercise and involves reading legal texts that are not accessible to the layperson. There is no succinct summary of

tenure rules that is aimed at the layperson, including fishers themselves. This is an addition to the fact that the laws and regulations themselves are hard to locate online. Therefore online public information on fisheries tenure is not easy to find.

## 2-B | COASTAL SUBSISTENCE FISHING

Basic information requirements:	Available online?	Up to date? <i>(The latest tenure rules and procedures are published)</i>	Easy to find?
Fees of access rights and fishing authorisations	No		
Duration of such rights and authorisations	No		
Authorities/persons that are legally entitled to issue such rights and authorisations	No		
Mandatory administrative procedures required to determine their issue	No		

Basic information requirements:	Available online?	Up to date? <i>(The latest tenure rules and procedures are published)</i>	Easy to find?
Conditions relating to fishing effort	No		
Conditions relating to ecosystem impact	No		
Conditions relating to landings (including the sale of fish)	No		
Conditions relating to catch reporting	No		
Provisions for formal mechanisms of external oversight and public consultations of fisheries tenure decisions	No		
	No		

## Available online?

Subsistence fishing is mentioned in the glossary of terms in the 2002 Fisheries Act, but only in reference to the definition of recreational fishing: this states that recreational fishing does not include fishing for subsistence purposes. No further reference is provided in this Act or subsequent regulations and amendments regarding subsistence fishing. Thus, subsistence fishing is recognised in the Fisheries Act, but the text does not provide any information on the tenure rights for this type of fisheries.

The lack of explicit, formal tenure rights for subsistence fishing does not mean subsistence fishing in Ghana is non-existent. It is likely to be quite common, including fishing from the shore and gleaning from beaches and mangrove forests. It is also assumed that informal rules apply to subsistence fishing, as there are no reports suggesting government authorities have taken measures to restrict it. Therefore, publicly available information on the tenure rights of subsistence fishing is considered to be not available, as opposed to not applicable.



## 2-C | SCIENTIFIC AND EXPLORATORY FISHING

Basic information requirements:	Available online?	Up to date? <i>(The latest tenure rules and procedures are published)</i>	Easy to find?
Fees of access rights and fishing authorisations	No		
Duration of such rights and authorisations	No		
Authorities/persons that are legally entitled to issue such rights and authorisations	Yes	Yes	No
Mandatory administrative procedures required to determine their issue	Yes	Yes	No
Conditions relating to fishing effort	No		
Conditions relating to ecosystem impact	No		
Conditions relating to landings (including the sale of fish)	No		
Conditions relating to catch reporting	No		
Provisions for formal mechanisms of external oversight and public consultations of fisheries tenure decisions	No		
	To a limited extent	To a full extent	No

## Available online?

Scientific and exploratory fishing is recognised in the 2002 Fisheries Act (sec.65) and the fishing regulations of 2010. However, the rules governing the issuing of such rights are vague. Almost all decisions on the granting of such rights are left to the discretion of the Minister,

including the fees applicable. However, it would seem that the issuing of scientific or exploratory fishing rights in Ghana is not common, limited to surveys undertaken by the EAF Nansen programme, which may account for the underdeveloped laws and regulations.

## Up to date?

The very limited information relevant to

scientific fishing is up to date.

## Easy to find?

The very limited information relevant to

scientific fishing is not easy to find.

## 2-D | SPORT FISHING

Basic information requirements:	Available online?	Up to date? <i>(The latest tenure rules and procedures are published)</i>	Easy to find?
Fees of access rights and fishing authorisations	No		
Duration of such rights and authorisations	No		
Authorities/persons that are legally entitled to issue such rights and authorisations	No		
Mandatory administrative procedures required to determine their issue	No		

Basic information requirements:	Available online?	Up to date? <i>(The latest tenure rules and procedures are published)</i>	Easy to find?
Conditions relating to fishing effort	No		
Conditions relating to ecosystem impact	No		
Conditions relating to landings (including the sale of fish)	No		
Conditions relating to catch reporting	No		
Provisions for formal mechanisms of external oversight and public consultations of fisheries tenure decisions	No		
No			

## Available online?

Recreational fishing is a term used in the 2002 Fisheries Act, and is assumed here to refer to cover sports fishing, i.e. fishing for pleasure. Recreational fishing is defined in the Fisheries Act as fishing for reasons other than for commercial purposes or subsistence. Somewhat confusingly, the rules for recreational fishing are presented in the same section for the rules relating to aquaculture.

No information is provided in the 2002 Fisheries Act on the rules governing recreational fishing, other than stating that recreational fishing should follow any regulations that are

developed for it. This assessment could find no further information online on what rules do exist for recreational fishing, including whether companies providing recreational fishing (i.e. for tourists) require a license and whether they are subject to any catch or gear restrictions.

It has not been possible to find information on the extent of recreational fishing in Ghana, although sports fishing companies advertise on the internet. According to experts consulted for this assessment, the sports fishing sector in Ghana is not well developed.



### 3. FOREIGN FISHING ACCESS AGREEMENTS

A foreign fishing access agreement refers to a contractual arrangement that is entered into between a coastal state and a foreign party<sup>43</sup> that allows the foreign party's fishing vessels to operate in the coastal state's marine jurisdictional waters.<sup>44</sup> These agreements provide a compensation for the coastal state, such as monetary transfers, commitments for investments and services, or reciprocal access to overseas fishing grounds for the country's national fishing fleet. A lack of transparency surrounding foreign fishing access agreements has been a persistent concern in international debates. Governments may not publicise whether foreign fishing access agreements are in active use, and the contracts of these agreements can be withheld as confidential information.

#### 3-A | FOREIGN-FLAGGED VESSELS FISHING IN GHANAIAN WATERS

Basic information requirements:	Available online?	Up to date? <i>(Agreements that came into force within the last 3 years are published)</i>	Easy to find?
Signed contracts allowing foreign-flagged vessels to fish in Ghanaian waters	Not applicable		
Related documents, such as Memorandum of Understandings or amendments (if applicable)	Not applicable		
Not applicable			

<sup>43</sup> Agreements can be signed between governments, between a coastal state and a union of foreign governments (such as the European Union), or between coastal states and private corporations, or associations of private companies.

<sup>44</sup> Territorial Sea and Exclusive Economic Zone, in the following referred to as '**Ghanaian waters**'.

## Available online?

There is no evidence that Ghana has entered into bilateral agreements that provides foreign-flagged vessels to fish in its waters. Ghana does not have a Sustainable Fisheries Partnership Agreement with the European Union, and there are no reports indicating it has

signed agreements with Asian countries, including China, Korea or Japan. The majority of industrial fishing vessels operating in Ghana are registered under the Ghanaian flag. European vessels fishing for tuna obtain private licenses.<sup>45</sup>

## 3-B | GHANAIAAN-FLAGGED VESSELS FISHING IN FOREIGN WATERS

Basic information requirements:	Available online?	Up to date? <i>(Agreements that came into force within the last 3 years are published)</i>	Easy to find?
Signed contracts allowing Ghanaian-flagged vessels to fish in third country waters	Not applicable		
Related documents, such as Memorandum of Understandings or amendments (if applicable)	Not applicable		
Not applicable			

## Available online?

Although industrial fishing vessels flagged to Ghana operate in the waters of other countries,

there is no evidence that Ghana has signed a bilateral agreement with another country.

<sup>45</sup> NFDS, COFREPECHE, MRAG and POSEIDON 2016. Ex ante evaluation of a Sustainable Fisheries Partnership Agreement and Protocol between the European Union and the Republic of Ghana



## 4. THE STATE OF THE FISHERIES RESOURCES

Concern is mounting over decreasing marine biodiversity due to human activities, such as overfishing, climate change, habitat destruction and pollution. National authorities have the duty to collate and publish information on the state of marine fish populations in their waters. This is particularly important for fish targeted by commercial fisheries, given their overfishing can put unsustainable pressure on stocks whose continued existence is essential for national development and food security. Transparency of government information regarding the status of fish stocks, including explanations on changes over time, is a critical feature of responsible fisheries management. Such information should be presented in an accessible way that supports wider public debate, rather than only published in technical scientific reports that are unlikely to be meaningful to the layperson.

### 4-A | NATIONAL REPORTS ON THE STATE OF MARINE FISH POPULATIONS

Basic information requirements:	Available online?	Up to date? (Published data is not older than 3 years)	Easy to find?
National reports on Ghana's marine fish population including at least the top 5 commercial fish species	Not produced		
Information on trends in the state of stocks and explanations on the reasons for change	Not produced		
Not produced			

#### Available online?

Our assessment did not locate a national report produced by the government of Ghana on the state of marine fish populations. Although the government collates data that permits estimates

on the abundance of fish populations, and there are studies provided by other organisations derived from statistics compiled by the MoFAD, there appears to be no effort to compile



national reports on this by the Ministry. Very brief statements on the health of fish stocks are made in the National Fisheries Management Plan (2015-2019), but this document does not come close to offering a national report on the

health of fish populations. Other ad-hoc statements by the MoFAD provide an overview of trends in catches for some species, indicating problems of overfishing.<sup>46</sup>

## 4-B | SCIENTIFIC STOCK ASSESSMENTS

Basic information requirements:	Available online?	Up to date? (Published data is not older than 3 years)	Easy to find?
Scientific stock assessments	No		
Information on the methods and data used to assess fish stocks			
Information on ongoing or planned efforts to update and expand fish stock assessments			
	No		

### Available online?

The government of Ghana does not publish scientific stock assessments online. **No stock assessment reports could be found on the website of the MoFAD or the Fisheries Commission.**

The MoFAD collates data from the marine fisheries sector that would permit scientific

stock assessments to be compiled. Some evidence exists that the government has undertaken stock assessments, including with the support of foreign partners. In the terminal report of the World Bank-financed West African regional programme for fisheries, it was stated that the government successfully completed 'a

<sup>46</sup> See for example the one page statement on small-pelagic fish published by the MoFAD: [https://www.mofad.gov.gh/wp-content/uploads/2018/09/MoFAD-Closed-Season-Factsheet\\_07112018.pdf](https://www.mofad.gov.gh/wp-content/uploads/2018/09/MoFAD-Closed-Season-Factsheet_07112018.pdf)

stock assessment for deep and shallow water fisheries in collaboration with the FAO and the Norwegian Government'.<sup>47</sup> This likely relates to stock surveys undertaken through the EAF-Nansen Programme. However, no recent reports of surveys undertaken under this programme could be found online. A stock survey from 2010 from the EAF-Nansen Programme is available through a third-party website, but our research could not find a more recent report.<sup>48</sup>

Independent fish stock assessments have been undertaken by academic institutions, based on data provided by the Fisheries Scientific Survey Division of the Fisheries Commission. Further analysis of fisheries data has been undertaken by staff in the MoFAD, and in particular those working within the **Research, Statistics and Information Management Department**.<sup>49</sup> The Fishery Committee for the Eastern Central Atlantic (CECAF) has published surveys for both small-pelagic fish and demersal fish for Ghana indicating fish abundance and the extent of

overfishing. Again, this is based on data provided by the MoFAD.

Scientists employed by the MoFAD have also published stock assessments, including a recent study on small pelagics.<sup>50</sup> However, there is no link to such articles on the website of the MoFAD and the Fisheries Commission. Support for stock assessments has also been provided by the USAID-funded 'Sustainable Fisheries and Management Project', which has included the establishment of a Scientific and Technical Working Group that works closely with the Fisheries Commission to advise on fish stock status.<sup>51</sup>

In summary, data exists for the production of stock assessments, employees of the Fisheries Commission and MoFAD have produced stock assessments published in academic journals, and data provided by the Fisheries Commission and MoFAD is used by others to undertake stock assessments. There has also been support to the Fisheries Commission and MoFAD provided

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<sup>47</sup> Op.Cit.See page 16 of this report.

<sup>48</sup> <https://aquadocs.org/bitstream/handle/1834/4996/Survey%20of%20the%20Demersal%20Fish%20Resources%20of%20the%20outer%20shelf> and Asiedu, Godfred. Assessment of Demersal Fish Stocks in Ghanaian and Adjacent Waters (November 16, 2021). One Ocean Hub Report, [https://oneoceanhub.org/wp-content/uploads/2021/12/Demersal\\_Report\\_v2.pdf%20and%20slope%20off%20Ghana.pdf?sequence=1&isAllowed=y](https://oneoceanhub.org/wp-content/uploads/2021/12/Demersal_Report_v2.pdf%20and%20slope%20off%20Ghana.pdf?sequence=1&isAllowed=y)

<sup>49</sup> See for example, Cook, Robin and Nyarko, Benjamin Kofi and Aggrey-Fynn, Joseph and Acheampong, Emmanuel and Asiedu, Godfred, Assessment of small pelagic fish stocks in Ghanaian and adjacent waters (November 4, 2021). Available at SSRN: <https://ssrn.com/abstract=3956447> or <http://dx.doi.org/10.2139/ssrn.3956447>; and Cook, Robin and Nyarko, Benjamin Kofi and Aggrey-Fynn, Joseph and Acheampong, Emmanuel Assessment of Demersal Fish Stocks in Ghanaian and Adjacent Waters (November 16, 2021). One Ocean Hub Report [https://oneoceanhub.org/wp-content/uploads/2021/12/Demersal\\_Report\\_v2.pdf](https://oneoceanhub.org/wp-content/uploads/2021/12/Demersal_Report_v2.pdf)

<sup>50</sup> Emmanuel K Dovlo., et al.'Catch Trends of Artisanal Fisheries in Ghana, West Africa'.Acta Scientific Agriculture4.3 (2020): 01-04. <https://actascientific.com/ASAG/pdf/ASAG-04-0815.pdf>

<sup>51</sup> See: <https://ghanalinks.org/web/sfmp>

by development partners to develop the capacity to undertake stock assessments. However, the government of Ghana does not publish the findings of stock assessments online, including on the website of the MoFAD or the Fisheries Commission. Indeed, there are no links to pages on stock assessments on these two websites and the information presented under ‘publications’ and ‘reports and statistics’ on the website of the MoFAD contains no entries linked to stock assessments. For this reason, our assessment

considers information on scientific stock status to be available but not published online, as opposed to being not produced.

Furthermore, the Fisheries Commission assesses both the biological and socio-economic impacts of the closed fishing season each year and disseminates the results through multi-stakeholder meetings. However, these reports are not published online.

**Up to date?**

The very limited information relevant to scientific fishing is up to date.

**Easy to find?**

The very limited information relevant to scientific fishing is not easy to find.



## 5: LARGE-SCALE FISHERIES

Large-scale commercial fishing often represents the most important sector of marine fisheries in terms of catches, landings, and government revenues. It typically involves the use of large high-capacity boats, equipped with on-board facilities for freezing and processing seafood while at sea. These vessels often remain at sea for long periods of time and carry large crews for catching and processing fish on board. A number of important issues affecting large-scale fisheries – ranging from levels of bycatch and discards to the fair distribution of revenues – make the public availability of information on the sector a crucial element of increasing transparency in fisheries management.

As described above, the 2022 Fisheries Act recognises a distinction between industrial and semi-industrial fishing vessels. The category of semi-industrial fishing is sometimes referred to as ‘inshore fishing’. In practice, the government does not seem to use this distinction for licensing purposes: the rules of registering a vessel and obtaining a license to fish are the same for both categories of fishing. Reference to ‘industrial fishing’ in Ghana’s official publications, including their list of registered fishing vessels, therefore conflates larger vessels with semi-industrial ones. **For the purpose of**

**our assessment, vessels commonly referred to as semi-industrial have been included in this section, as opposed to the following section (section 6) that considers information on small-scale fisheries.**

The number of industrial vessels licensed to fish in Ghana’s waters fluctuates, but research for this assessment confirms that over the past decade the number of fishing vessels – including both foreign-flagged and Ghanaian-flagged vessels is approximately 80-90. There are roughly 150 semi-industrial fishing vessels in addition to this.

### 5-A | VESSELS

Basic information requirements:	Available online?	Up to date? (Published data is not older than 1 year)	Easy to find?
Registry of Ghana- and foreign-flagged vessels authorised to fish in Ghanaian waters	Partially	Partially	No

Basic information requirements:	Available online?	Up to date? <i>(Published data is not older than 1 year)</i>	Easy to find?
Name of the vessel	Yes	Partially	No
Legal owner of the vessel, including their address and nationality	Partially	Partially	No
Registered port of the vessel	No		
Flag State of the vessel	Yes	Partially	No
Unique identification number(s) of the vessel	Yes	Partially	No
Type of vessel, according to fishing gear or fishing method	Partially	Partially	No
Physical characteristics of the vessel, including length, beam, tonnage and engine power	Partially	Partially	No
Name of the vessel's agent	No		
Access agreement under which the foreign-flagged vessel is authorised to fish	Not applicable		
Type of fishing authorisation held by the vessel	Yes	Partially	No
Quantity and names of target species, permissible bycatch and discards that the vessel is authorised to fish, if specified in the vessel's fishing authorisation	No		
Duration of the fishing authorisation, indicating start and end date	No		
Rights holder for whom the vessel is fishing, including the name and nationality of the rights holder	Not applicable		
Country and/or regions of the High Seas where the nationally-flagged vessel is authorised to fish	No		
	To a limited extent	To a limited extent	No

The Government of Ghana has recently published a vessel registry and a separate list of licensed vessels. These two documents are somewhat difficult to evaluate in terms of meeting the transparency requirements set out in the FITI Standard. The main reason for this is that the list of licenses issued by the Ghanaian authorities only covers a six-month period—from January to June 2022. The list of registered vessels is also presented as accurate as of June 2022. Because these lists cover only half of the year, this assessment considers the registry to be only partially available. The omission of information after June 2022 is relevant to transparency in Ghana's fisheries. This is demonstrated by concerns raised by civil society organisations in July 2022 that 2 vessels were provided licenses in 2022, despite the government's moratorium on authorising more vessels than were registered in 2021.<sup>52</sup> The vessels are not included in the online list of registered vessels, presumably as they were added after June 2022.

Another reason the registry is partially available is that it does not include semi-industrial fishing vessels.

Information for licenses is presented for Ghanaian-flagged vessels and for third country tuna vessels separately. However, it should be noted that **the list of third country vessels that have been issued licenses to catch tuna**

**in Ghana's waters appears incorrect.** This includes four vessels flagged to Belize, but two of these vessels appear on the list of licensed Ghanaian vessels as well (Atlantic Glory and Atlantic Prince, both owned by Africa Star Fisheries, registered in Ghana). These vessels are also included in the vessel registry as Ghanaian-flagged vessels.

In addition to these inconsistencies, the information published by the MoFAD also only partially fulfills the attributes of a vessel registry, as shown above. For example, although the company owning the vessel is published, further information on their address and agent is not published. There is information on the vessel's weight, but not on what type of vessel and the gear used. There is no information on the duration of licenses. There is also no information on what type of fish the vessels are authorised to fish, apart from the designation of some boats being tuna fishing vessels.

In general, while it is a **notable achievement** of the national authorities to publish a list of licensed and registered vessels in the industrial sector, the current publication of this information is limited by omissions in detail and time coverage. There is also no reason why semi-industrial vessels should be missing from this list.

Finally, there are no previous online records of licensed vessels, or a vessel registry published

<sup>52</sup> See the open letter here: <https://henmpoano.org/wp-content/uploads/2022/07/Open-Letter-to-Fisheries-Minister.pdf>



by the government. What is published by the MoFAD is therefore the first example of an online vessel registry and list of licenses. However, on the website of the MoFAD there is a webpage that is entitled '**Ghana fishing registry**

**and licensing system'**. This may contain more up to date information; however, it is **password protected** and therefore assessed as inaccessible.<sup>53</sup>

## Up to date?

The two documents containing the registry of fishing vessels and the list of licensed vessels are up to date. However, as stated above, both

documents cover only the first 6 months of 2022. Therefore, our assessment considers these documents as only partially up to date.

## Easy to find?

From the homepage of the MoFAD, the top navigation menu contains a category of information entitled 'Publications'. A sub-menu includes 'Statistics and reports', which has a further sub-menu including 'Vessel registry'. This has a landing page with a main link to a 'Vessel registry system' and a side bar options for downloading information on 'Active semi-industrial vessels' and 'Active industrial vessels'. The side links do not link to anything (i.e. they are deadlinks). Clicking on the link to the 'Vessel registry system' takes the user to a page that is password protected. Thus, following the navigation of the MoFAD website a user will not find any information on the vessel registry.

Using the search function on the MoFAD website, the keyword search 'Vessel registry' also

directs users to the vessel registry system that cannot be accessed.

The two .pdf documents that are published online and made accessible for anyone to download, can be found from the website entitled 'Articles'. This links to several documents including one that is entitled 'List of registered vessels'. This also contains an alert to a previous article on the 'List of licensed vessels'. This document on the list of licensed vessels cannot be found from any other navigation point.

Thus, although the documents on the vessel registry and the list of vessels can be located on the website of the MoFAD, this assessment considers this information to be not easy to find. It is quite likely that a user would fail to find this information if they were looking for it.

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<sup>53</sup> <http://ghfishreg.gov.gh/#/>

## 5-B | PAYMENTS

Basic information requirements:	Available online?	Up to date? (Published data comprises previous calendar year)	Easy to find?
Annual total amount of payments for fishing from large-scale vessels	No		
Name of the natural person or legal entity that made the payment			
Name of the national authority who received the payment			
Date on which payment was received by the national authority			
Purpose of the payment			
No			

### Available online?

As established in the 2002 Fisheries Act, all revenues from license sales are to be deposited in a Fisheries Development Fund. However, this assessment could not find any government information on the payments received by this fund from industrial fishing vessels.

Our assessment also searched for data on revenues from the fisheries sector published by the Ministry of Finance. However, there are no

records of fisheries revenues in the data published by the Ministry, and these revenues appear to be consolidated under a more general heading of government revenues.<sup>54</sup> In its medium term review of the MoFAD for the years 2022-2025, there was no information on income generated.<sup>55</sup> Similarly, the annual reports of the Parliamentary Select Committee on Food, Agriculture and Cocoa Affairs contain

<sup>54</sup> <https://mofep.gov.gh/fiscal-data>

<sup>55</sup> See the 'Medium Term Expenditure Framework for 2022-2025: Ministry of Fisheries and Aquaculture Development', available at: <https://mofep.gov.gh/sites/default/files/pbb-estimates/2022/2022-PBB-MoFAD.pdf>

information on budgets and income for the MoFAD, but do not provide information on license revenues applicable to large-scale fisheries.

Information on the revenues from industrial fishing licenses (as well as from penalties and

fines) has been published by non-government organisations, including the World Bank and the Environmental Justice Foundation.<sup>56</sup> This information was credited to data supplied by the Fisheries Commission.

## 5-C | CATCHES WITHIN GHANAIAN WATERS

Basic information requirements:	Available online?	Up to date? (Published data comprises previous calendar year)	Easy to find?
Total quantity of annual recorded retained catches	Yes	Yes	No
Disaggregated by species or species groups	No		
Disaggregated by fishing authorisations or gear type	No		
Disaggregated by flag State of the vessels	No		
	To a limited extent	To a full extent	No

### Available online?

The MoFAD and the Fisheries Commission do not publish an annual statistical report that includes data on catches. On the website of the MoFAD there is a landing page devoted to fish production statistics.<sup>57</sup> This provides data on the total production of fish according to three

sub-sectors: aquaculture, inland and marine fisheries. There is no breakdown of fish production for industrial and/or semi-industrial fishing. The latest data provided on this page is for 2017.

<sup>56</sup> See World Bank (2019) Op.Cit. Also, EJF (2021) 'At what cost?: How Ghana is losing out in fishing arrangements with China's distant water fishing fleet': [https://ejfoundation.org/resources/downloads/EJF\\_At-What-Cost\\_-2021\\_final.pdf](https://ejfoundation.org/resources/downloads/EJF_At-What-Cost_-2021_final.pdf)

<sup>57</sup> <https://www.mofad.gov.gh/publications/statistics-and-reports/fish-production/>

It is possible that this landing page represents the effort by the government to produce a *fisheries statistic dashboard*, which was an agreed activity of the World Bank-funded regional Fisheries Programme country project for Ghana. However, as a primary entry point for public information on fishing statistics, this does not correspond to the level of detail set out in the World Bank project documentation.

As per the national laws on fisheries authorisations, fishing vessels are required to submit detailed data on fish catches and landings to the MoFAD, and there is further data generated from fishing observers at sea and in ports. Thus, the national fishing authorities ought to be expected to have detailed information on fish catches, including on

species. This is confirmed by other reports evaluating stock assessments (see above, section 4). There are other government reports that provide highly aggregated data on fish catches attributed to the industrial and semi-industrial fishing sectors. Summary data is provided in the National Fisheries Management Plan, for example. More up to date information is also included in the medium-term review of the MoFAD, produced by the Ministry of Finance (covering years 2021), as well as reports by the Parliamentary Select Committee on Food, Agriculture and Cocoa Affairs that oversees the MoFAD (the latest report covering 2022). These do not, however, provide a breakdown on species.

## Up to date?

The information provided by the Parliamentary Select Committee on Food, Agriculture and

Cocoa Affairs is up to date.

## Easy to find?

The most recent and detailed data on catches published by national authorities is not easy to find. This is particularly so given that the website

of the MoFAD has a landing page for fisheries statistics, but fails to provide any useful data.

## 5-D | CATCHES OUTSIDE GHANAIAW WATERS

Basic information requirements:	Available online?	Up to date? <i>(Published data comprises previous calendar year)</i>	Easy to find?
Total quantity of annual recorded retained catches by Ghanaian-flagged vessels	No		
Disaggregated by species or species groups			
Disaggregated by fishing authorisations or gear type			
Disaggregated by fishing area (i.e. High Seas and third country)			
	No		

### Available online?

No reports are published by national authorities providing data on the catches of

Ghanaian-flagged vessels outside of Ghana's waters.

## 5-E | LANDINGS IN GHANAIAW PORTS

Basic information requirements:	Available online?	Up to date? <i>(Published data comprises previous calendar year)</i>	Easy to find?
Total quantity of annual recorded landings in Ghanaian ports of fish caught in Ghanaian waters	No		

Basic information requirements:	Available online?	Up to date? (Published data comprises previous calendar year)	Easy to find?
Disaggregated by species or species groups			
Disaggregated by fishing authorisation or gear type			
Disaggregated by flag State of the vessels			
	No		

## Available online?

No reports are published by national authorities providing data on the landings of fish in Ghanaian ports. It is understood that fish landed by industrial fishing vessels will be in the ports

of Tema and Takoradi, while semi-industrial fishing vessels also use the Elmina landing beach in the Central region of Ghana.

## 5-F | TRANSSHIPMENTS AND LANDINGS IN FOREIGN PORTS

Basic information requirements:	Available online?	Up to date? (Published data comprises previous calendar year)	Easy to find?
Total quantity of annual recorded transshipments at sea or landings in foreign ports of fish caught in US waters	No		
Disaggregated by species or species groups			
Disaggregated by fishing authorisation or gear type			
Disaggregated by flag State of the vessel			
	No		



## Available online?

No reports are published by national authorities providing data on transshipments at sea or landings in foreign ports of fish caught in Ghana's waters. As set out in the 2010 fisheries regulations, there are strict rules in place that prohibit transshipping at sea in Ghana, although it is well documented that such rules have not been respected by industrial fishing vessels and

that large quantities of fish have been transferred at sea from industrial vessels to artisanal ones. More recently sources in Ghana report the government has increased enforcement against this and therefore transshipping has declined. Nevertheless, there are no government data providing proof of this.

## 5-G | DISCARDS

Basic information requirements:	Available online?	Up to date? (Published data is not older than 3 years)	Easy to find?
Total quantity of annual discards from large-scale vessels authorised to fish in Ghana's waters	No		
Disaggregated by species or species groups			
Disaggregated by fishing authorisation or gear types			
Disaggregated by flag State of the vessels			
	No		

## Available online?

No reports are published by national authorities providing data on discards at sea. The 2010 fishing regulations require vessels to report on discards to the Fishing Commission, although it

is not known whether such reports are made. This assessment assumes some data exists and therefore the information is not published, as opposed to not produced.

## 5-H | FISHING EFFORT

Basic information requirements:	Available online?	Up to date? (Published data comprises previous calendar year)	Easy to find?
Total annual recorded fishing effort	No		
Disaggregated by fishery or gear types			
Disaggregated by flag State of the vessels			
	No		

### Available online?

No reports are published by national authorities providing data on fishing effort by large-scale vessels, although it is evident in stock

assessments that the government has such data and shares it with others.



## 6. SMALL-SCALE FISHERIES

In many countries, commercial small-scale fisheries – also commonly referred to as artisanal fisheries – account for the vast majority of people engaged in fishing activities, whether they be full-time, part-time or seasonal. It is widely recognised that this sector can play a vital role in national food security, the economic well-being of large numbers of people, as well as the culture of coastal communities. However, official information on the small-scale sector is often limited and inadequate public resources are allocated to collating this information. This represents a potential barrier to responsible fisheries management. It may also marginalise small-scale fisheries in national debates and policy implementation.

Government information on the artisanal fisheries sector in Ghana is extremely limited. This is despite evidence that the MoFAD collates data on artisanal fisheries and has compiled several notable and in-depth publications containing primary data. However, the resulting reports and data are not published by the MoFAD or the Fisheries Commission and can only be found through third party websites or in

scientific journals. Because of this, the following section is repetitive: almost all data requirements assessed are not available online by government authorities. It is perhaps worth emphasising that this is despite the resources assigned to the MoFAD for improving government communication and data gathering by foreign donors.

### 6-A | VESSELS

Basic information requirements:	Available online?	Up to date? (Published data is not older than 3 years)	Easy to find?
Total number of commercial small-scale fishing vessels	No		
Disaggregated by categories of fishing or gear types			
No			

## Available online?

A survey of fishing canoes is undertaken every three years in Ghana, with the first having been done in 1969. The most recent survey was completed in 2022. This provides various data on the numbers of fishing canoes, estimates on the people involved and it contains some further demographic information. The results of these surveys form the basis of further

assessments on catches.

However, the results of these surveys is not published by the government. This assessment could only locate a copy of the 2016 canoe survey through the annotated bibliography produced by the Sustainable Fisheries Management Project.<sup>58</sup>

## 6-B | LICENSES

Basic information requirements:	Available online?	Up to date? (Published data comprises previous calendar year)	Easy to find?
Total number of licenses issued to commercial small-scale fishing vessels	No		
Disaggregated by categories of fishing authorisations			
No			

## Available online?

As described above, licenses are required for artisanal fisheries canoes in Ghana. There are, however, no public records of how many

licenses in total or for different gear types are issued in the artisanal fisheries sector published online by Ghanaian national authorities.

<sup>58</sup> <https://www.crc.uri.edu/download/Final-2016-Canoe-Frame-Survey-Report.pdf>

## 6-C | FISHERS

Basic information requirements:	Available online?	Up to date? (Published data is not older than 3 years)	Easy to find?
Total number of small-scale fishers	No		
Disaggregated by gender information			
Disaggregated by type of occupation <sup>59</sup>			
	No		

### Available online?

The number of fisheries active in marine fisheries was reportedly estimated in the 2022

canoe survey. However, this data is not published by the national authorities.

## 6-D | PAYMENTS

Basic information requirements:	Available online?	Up to date? (Published data comprises previous calendar year)	Easy to find?
Total amount of payments made from commercial small-scale fisheries	Not applicable		
Disaggregated by payments for fishing authorisations, catches and landings			
Disaggregated by categories of fishing authorisations or gear types			
Disaggregated by recipient of payments			
	Not applicable		

<sup>59</sup> Proportion of full-time work, seasonal or part-time fishing.

## Available online?

Our assessment found no government information published regarding the payments from the artisanal fisheries sector to the Fisheries Commission. Although a license is

required by law, it is accepted that this is not being applied. Therefore this assessment considers information on payments to be not applicable.

## 6-E | CATCHES

Basic information requirements:	Available online?	Up to date? (Published data is not older than 3 years)	Easy to find?
Total quantity of catches made by the small-scale sector	No		
Disaggregated by species			
Disaggregated by categories of fishing authorisations and gear types			
No			

## Available online?

Our assessment found no government information on catches from the artisanal fisheries sector. However, there are recent publications in academic journals that present

data on catches, including for different fish species, based on data provided by the Fisheries Commission.<sup>60</sup>

<sup>60</sup> [https://www.researchgate.net/profile/Bortey-Alabi-Doku/publication/333566631\\_Fisheries\\_resources\\_of\\_Ghana\\_present\\_status\\_and\\_future\\_direction/links/5cfbd36d92851c874c59470f/Fisheries-resources-of-Ghana-present-status-and-future-direction.pdf](https://www.researchgate.net/profile/Bortey-Alabi-Doku/publication/333566631_Fisheries_resources_of_Ghana_present_status_and_future_direction/links/5cfbd36d92851c874c59470f/Fisheries-resources-of-Ghana-present-status-and-future-direction.pdf)

6-F | DISCARDS

Basic information requirements:	Available online?	Up to date? <i>(Published data is not older than 3 years)</i>	Easy to find?
Total volumes of discards by the small-scale sector	Not applicable		
Disaggregated by species			
Disaggregated by categories of fishing authorisations and gear types			
	Not applicable		

Available online?

No information was found on discards from artisanal fisheries. This may reflect the fact that discards are very low to non-existent in coastal artisanal fisheries. Therefore, our assessment

considers this aspect as not applicable to Ghanaian small-scale fisheries, opposed to information not being produced or not been published online.





## 7. POST-HARVEST SECTOR AND FISH TRADE

Fish is the most traded agricultural product in the world. The commerce it generates provides important revenues and foreign exchange. The fisheries post-harvest sector – which includes the processing and selling of fish – often accounts for the majority of jobs created across the industry, and, in many countries, the sector represents an important source of income for women. The inflow and outflow of fish from a country also has substantial implications on national food availability. Widespread public access to information is therefore critical for ensuring properly informed national debates around the post-harvest sector's management and the resulting social, economic and food security implications.

### 7-A | IMPORTS

Basic information requirements:	Available online?	Up to date? (Published data is not older than 2 years)	Easy to find?
Total quantity of imports of fish and fish products	No		
Disaggregated by species and fish products			
Disaggregated by country of origin			
No			

#### Available online?

Our assessment was unable to locate annual reports of fish imports into Ghana. This data is not provided on the websites of the MoFAD or the Fisheries Commission. Further research to locate this information included reviewing documents and data on the website of the

Ministry for Trade and Industry, and the Ghana Statistical Services. However, this failed to locate any data as well.

Non-government reports indicate that data on imports is collated by national authorities. For

example, a report produced by the Global Agricultural Information Network for the United States Department for Agriculture on the seafood sector of Ghana, dated 2022, includes import data up to the year 2021.<sup>61</sup> Past statements by the Minister of the MoFAD have

also included estimates of total imports and exports.<sup>62</sup>

It is therefore the conclusion of our assessment that trade data is collated, but not published online.

## 7-B | EXPORTS

Basic information requirements:	Available online?	Up to date? (Published data is not older than 2 years)	Easy to find?
Total quantity of exports of fish and fish products	No		
Disaggregated by species and fish products			
Disaggregated by country of destination			
	No		

### Available online?

The situation with export data mirrors that of import data.

## 7-C | EMPLOYMENT IN COMMERCIAL FISHERIES

Basic information requirements:	Available online?	Up to date? (Published data is not older than 3 years)	Easy to find?
Total number of people employed in commercial fisheries sectors	Not produced		

<sup>61</sup> [https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Ghana%20Seafood%20Report\\_Accra\\_Ghana\\_GH2022-0005.pdf](https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Ghana%20Seafood%20Report_Accra_Ghana_GH2022-0005.pdf)

<sup>62</sup> See for example: <https://citifmonline.com/2017/09/ghana-imports-60-of-fish-consumed-fisheries-minister/#:~:text=Ghana%20may%20soon%20lose%20its,60%20percent%20of%20its%20fish.>

Basic information requirements:	Available online?	Up to date? (Published data is not older than 3 years)	Easy to find?
Disaggregated by gender			
Disaggregated by sub-sectors			
Not produced			

## Available online?

No statistics were found online by national authorities on the total number of people employed in the commercial marine fisheries sector of Ghana. The 2016 survey on artisanal canoes provided estimates of the number of fishers on canoes, but not those involved in the post-harvest sector or in the semi-industrial and industrial fishing sectors. As mentioned above, this 2016 survey is not published by the government either.

In several reports on Ghana's fisheries, estimates are provided on total employment, although it is not clear what surveys these estimates are based on. For instance, a briefing on Ghana's fisheries by the Sustainable Fisheries Management Project in 2018 described that 263,000 people were employed in the marine fisheries sector. This data derives from a

country report of Ghana's fishing sector produced by the FAO.<sup>63</sup> However, when reading this report by the FAO, the figure relates to people engaged in fishing, not the post-harvest sector, and there is no reference to where this figure originates from.

Our assessment considered data derived from national economic surveys, including labour market surveys linked to the national census, as conducted by the **Ghana Statistical Service**. However, as is common with such survey's, there is no category for employment in fisheries, rather a general category for employment in agriculture, forestry and fisheries combined.<sup>64</sup>

Our assessment therefore considers information on employment in the fisheries sector to be not produced, as opposed to available data not being published online.

<sup>63</sup> <https://www.fao.org/fishery/en/facp/gha?lang=en>

<sup>64</sup> [https://www.statsghana.gov.gh/gssmain/fileUpload/pressrelease/2021%20PHC%20General%20Report%20Vol%203E\\_Economic%20Activity.pdf](https://www.statsghana.gov.gh/gssmain/fileUpload/pressrelease/2021%20PHC%20General%20Report%20Vol%203E_Economic%20Activity.pdf)

## 7-D | EMPLOYMENT IN INFORMAL FISHERIES

Basic information requirements:	Available online?	Up to date? (Published data is not older than 3 years)	Easy to find?
Total number of people employed in informal fisheries sectors	Not produced		
Disaggregated by gender			
Disaggregated by sub-sectors			
Not produced			

### Available online?

There are no estimates of the number of people engaged in the fisheries sector on an informal basis, despite strong evidence that many people (probably the majority) catching and supplying fish for local markets are not formerly registered with the government. Indeed, it has been estimated that over 80% of employment in

Ghana is in the informal sector.<sup>65</sup>

For our assessment, it is therefore assumed that the Ghanaian government has not produced such information, opposed to not publishing available data.

<sup>65</sup> [https://www.wiego.org/sites/default/files/publications/file/WIEGO\\_Statistical\\_Brief\\_N21\\_0.pdf](https://www.wiego.org/sites/default/files/publications/file/WIEGO_Statistical_Brief_N21_0.pdf)



## 8. FISHERIES LAW ENFORCEMENT

There has been growing international awareness of the scale and impacts of non-compliance with national laws and regulations, such as those associated with 'illegal, unreported and unregulated' (IUU) fishing. Increasing attention is focusing on how public authorities of coastal states respond to this challenge, including on their ability to enforce compliance and administer effective and fair criminal justice. However, reporting on these efforts is often neglected, undermining informed public debates on how the challenges arising from these illicit activities can be most effectively addressed.

### 8-A | ENFORCEMENT OF LAWS

Basic information requirements:	Available online?	Up to date? (Published data is not older than 2 years)	Easy to find?
National activities and strategies used for ensuring compliance of fishing vessels and the post-harvest sector with national legislation	Yes	Yes	No
Financial and human resources deployed by the government to ensure compliance with national legislation	Yes	Yes	No
Total numbers of inspections of fishing vessels at sea and in ports	Partially	Yes	No
	To a full extent	To a full extent	No

There are multiple agencies involved in law enforcement in fisheries, including the Navy, Customs, the Maritime Authority and the Police Marine Unit. An interagency approach is coordinated through the Fisheries Enforcement Unit that is coordinated by the MoFAD.

For several years the MoFAD has highlighted the threats to sustainable fisheries from illegal fishing activities, and this has been a major theme communicated by international partners and civil society organisations. Amendments to the Fisheries Act in 2014 and the additional fisheries regulations in 2015 focused on measures to improve Ghana's response to Illegal, Unregulated and Unreported fishing (IUU), and in 2014 Ghana also produced a National Plan of Action to eradicate IUU Fishing, following international guidelines established by the FAO. It is noteworthy that a copy of this plan cannot be found on the website of the MoFAD or the Fisheries Commission.

Combatting IUU fishing was also incorporated into the last five-year National Fisheries Management Plan.

Reporting by the MoFAD and the Fishing Commission on national activities and strategies for law enforcement is fairly limited. In May 2021, the Ministry produced a national report on

the progress for implementing its National Plan of Action, although the resulting document provided little data on past activities and progress.<sup>66</sup> However, this does give a timeframe for the delivery of key actions. Beyond this, there are no systematic reports produced by the MoFAD and specifically the law enforcement division within the Ministry.

The most detailed information on activities and results can be found in the annual reports of the Parliamentary Select Committee on Food, Agriculture and Cocoa Affairs. These provide highlights of activities and results of law enforcement operations. Details are again fairly limited. However, there are summary information on total inspections, as well as activities designed to educate fishers on illegal fishing and deter non-compliance. Because of the brevity of information on this, the assessment considers the information to be only partially available.

In these reports, as well as in the medium-term review produced by the Ministry of Finance, information is provided on the budget of the MoFAD for its law enforcement division, as well as human resources (staffing) and assets, including patrol vessels.

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<sup>66</sup> [https://www.mofad.gov.gh/wp-content/uploads/2022/05/GHANA-NPOA-IUU\\_FINAL\\_04.05.21.pdf](https://www.mofad.gov.gh/wp-content/uploads/2022/05/GHANA-NPOA-IUU_FINAL_04.05.21.pdf)

## Up to date?

The information available is considered as up to date.

## Easy to find?

The information on national strategies and activities on illegal fishing is considered difficult to find. The report on the progress of the MoFAD to implement its National Plan of Action on IUU is not linked to any coherent navigation menu and was therefore found by chance

through an external web search (e.g. using Google). Ideally, this information would be collated under a thematic heading on law enforcement, which does not exist on the website at the moment.

## 8-B | SANCTIONS FOR MAJOR OFFENCES

Basic information requirements:	Available online?	Up to date? (Published data covers the last 5 years)	Easy to find?
Record of convictions for major offences in the fisheries sector	No		
Name of the company or vessel owner, the nature of the offence and the penalty imposed			
Nature of the offence			
Penalty imposed			
	No		



No government record of convictions for major offences in the fisheries sector could be found.

Non-government organisations have raised concerns regarding transparency and accountability of national authorities in responding to illegal fishing in the industrial sector, and subsequent research has documented selected cases of penalties and fines imposed on fishing companies, as well as the practice of agreeing to out of court settlements.<sup>67</sup>

There is a clear demand for greater transparency on the outcomes of investigations and prosecutions in the industrial sector. While the national authorities have yet to provide this information, a positive step is the publication on the MoFAD's website of summary information on the outcome of vessel inspections.<sup>68</sup> However, this information could be presented in a more systematic way, such as linking inspection reports to the vessel registry.

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<sup>67</sup> See EJF, 2019. Analysis of penalties and fines is also included in the terminal report of the World Bank, 2019.

<sup>68</sup> <https://www.mofad.gov.gh/inspection-of-vessels-long-xiang-601-and-long-xiang-606/> It is interesting to note that in this example, the inspectors found the Captain of the vessel, which is Ghanaian flagged did not speak English and only Chinese. As per the 2015 fisheries regulations, fishing vessels must be able to communicate in English.



## 9. LABOUR STANDARDS

Fisheries provide jobs and income for large numbers of people, both in the harvest and post-harvest sectors. However, it is widely recognised that employment in fisheries is among the most arduous and dangerous in the world. Public authorities have a duty to ensure they apply high labour standards to all parts of their fisheries sector and that their efforts to enforce these standards are well documented. This is critical information for ensuring the rights of those working in the sector are respected.

On the social regulations side, many laws and regulations exist which cover the rights and safety of workers, the vulnerable in society and the social issues confronting communities. The fundamental human rights of every Ghanaian are enshrined in the 1992 Constitution. Other social and labour laws include the Labour Act, 2003, Act 651, the Children's Act, 1998, Act 560, Human Trafficking Act, and the Commission on Human Rights and Administrative Act, 1993, Act 456.

Some policies have been designed to support implementation of these laws, including the Ghana National Social Protection Policy, 2015, Child and Family Welfare Policy, 2014. Ghana has also ratified other International Labour

Organization (ILO) Conventions to guide the country in its labour and social issues. Some of these conventions guarantee workers the right and freedom to join or form worker unions (Convention No.87), the right to equal treatment (Conventions Nos. 100 and 111), the right to collective bargaining (Convention No. 98) as well as conventions to promote industrial harmony and welfare of workers.

Among the institutions responsible for implementing these rules and regulations are the Commission on Human Rights and Administrative Justice (CHRAJ), the National Labour Commission (NLC), the Ministry of Employment and Labour Relations, and the National Tripartite Committee (NTC).

## 9-A | ENFORCEMENT OF LABOUR STANDARDS

Basic information requirements:	Available online?	Up to date? (New laws that came into force within the last 5 years are published)	Easy to find?
National strategies and activities for ensuring compliance with labour standards in the fisheries sector	No		
Financial and human resources deployed by the government to ensure compliance with labour standards	No		
No			

### Available online?

There are several national agencies that have responsibility for developing strategies and activities for the implementation of labour standards. This includes the Commission on Human Rights and Administrative Justice, the National Labour Commission, the Ministry of Employment and Labour Relations, and the National Tripartite Committee. Research for this assessment has attempted to understand which of these national authorities has the mandate to lead on labour rights issues in the fisheries sector, including their respective roles in dealing with grievances. However, it is not entirely clear what responsibilities each has and there appear to be overlaps.

Additionally, the websites of the Commission on Human Rights and Administrative Justice as well as the National Labour Commission, were not functioning at the time of our research. Ultimately, no information could be found about any of these authorities and their work in the fisheries sector.

The assessment also found that the MoFAD have yet to produce a national strategy that deals directly with labour rights in the fisheries sector. Enforcement of laws has emphasised illegal fishing activities. The exception to this, however, is the extensive work that has been undertaken on **child labour and trafficking in the fisheries sector**. This was identified as a

priority theme under the USAID financed Sustainable Fisheries Management Project. In 2015, the MoFAD produced a National Strategy

on anti-child labour and trafficking in the fisheries sector.<sup>69</sup> Unfortunately, this is not published on any government website.

## 9-B | SANCTIONS FOR LABOUR STANDARD OFFENCES

Basic information requirements:	Available online?	Up to date? (Published data is not older than 2 years)	Easy to find?
Total number of labour standard offences in the fisheries sector that have been resolved by national authorities	Not produced		
Not produced			

### Available online?

Reflecting the dearth of published information on strategies to address labour rights in the fisheries sector, there are no government reports that summarise offenses and their resolution. No records could be found (including in NGO and academic literature) or fishing companies being investigated or penalised for labour related issues in industrial fisheries. Furthermore, although there is a large amount of grey literature on activities on combatting child labour in the fisheries sector of Ghana, activities have been focused on community

awareness and sensitisation of labour laws.<sup>70</sup>

It would seem unlikely that national authorities have collated information on labour rights abuses that have been investigated or resolved by national authorities. For this reason, our assessment considers this information as not produced. However, it is also possible that labour related offenses in the fisheries sector are not receiving attention from the authorities, and therefore no offences are detected.

<sup>69</sup> [https://www.crc.uri.edu/download/GH2014\\_POL008\\_MoFAD\\_FIN508.pdf](https://www.crc.uri.edu/download/GH2014_POL008_MoFAD_FIN508.pdf)

<sup>70</sup> Several community outreach activities and workshops are described in the annotated bibliography provided by the Sustainable Fisheries Management Project.



## 10. FISHERIES SUBSIDIES

The extent and purpose of government subsidies offered to a country's fisheries sector has long been one of the most controversial themes in international debates on responsible fisheries management. Perhaps more than any other single factor, subsidies are seen as the source of a range of problems, such as overfishing, illegal fishing and unfair benefit sharing.

### 10-A | GOVERNMENT FINANCIAL TRANSFERS OR SUBSIDIES

Basic information requirements:	Available online?	Up to date? (Previous calendar year)	Easy to find?
Total value of financial transfers or subsidies to the fisheries sector	Partially	Yes	No
Disaggregated by type/purpose	Partially	Yes	No
Disaggregated by recipient	Partially	Yes	No
Average annual value of any fuel subsidies per unit of fuel (in nominal and percentage terms)	Yes	Yes	No
	To a large extent	To a full extent	No

#### Available online?

The government of Ghana provides various types of subsidies to the fisheries sector. Predominantly, direct transfers are provided to

the artisanal fisheries sector. This includes the allocation of fuel for fishers at a subsidised rate. The MoFAD has established a dedicated agency

for this service, known as the **National Premix Secretariat**.

Other direct subsidies to the artisanal fisheries sector are provided on an ad-hoc basis, and include the development of landing sites, the provision of ice and loans for buying engines.<sup>71</sup> During the enforced closed season for fishing, the government have also provided fishers with food and cooking as compensation for lost income.

There are no reports produced by the MoFAD that details fishing subsidies. However, some information is contained in budget reporting documents produce by the Ministry of Finance. The mid-term expenditure framework report for 2022 provides a summary of government expenditures for fisheries development in a narrative form, although it does not refer to these transfers as subsidies. This includes a description of the total volume of fuel issued to the marine fisheries sector, but not the value of this transfer. However, it is unclear whether this is a complete analysis of all subsidies, including financial assistance for the purchase of fishing

gears. This report also does not cover indirect subsidies, although these can be deduced from the information on government expenditures, such as on fisheries management and research. Similar information is found in the annual reports of the Parliamentary Select Committee on Food, Agriculture and Cocoa Affairs.

Although the National Premix Secretariat has its own landing page on the website of the MoFAD, it does not provide information on the quantity, value and recipients of fuel subsidies.<sup>72</sup>

Therefore, for this assessment, the information provided by the Ministry of Finance is considered to represent partial information on subsidies only.

It is noted that the MoFAD announced in 2021 that the allocation of premix fuel to fishers would transition to a digitized service, designed to increase transparency and prevent abuses of the policy (i.e. hoarding). Details of progress on this initiative cannot be found, and although press articles indicate that a pilot project has been started.<sup>73</sup>

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<sup>71</sup> An analysis of subsidies in Ghana's fisheries in 2012 is provided by Sackey-Mensah, R. (2013). Fuel subsidy in Ghana's marine artisanal fisheries sector: <https://www.grocentre.is/static/gro/publication/285/document/rebecca12prf.pdf>

<sup>72</sup> <https://www.mofad.gov.gh/agencies/national-premix-secretariat/>

<sup>73</sup> <https://www.graphic.com.gh/news/general-news/premix-fuel-supply-to-go-digital.html>



## 11. OFFICIAL DEVELOPMENT ASSISTANCE

Official development assistance (ODA) can represent an important source of funds to support the development of a country's fisheries sector. However, it is common knowledge that ODA is not always delivered in the most effective manner. This is exacerbated in situations where public information on the value, purpose and outcomes of public sector development projects remains unpublished. This can also lead to a lack of public participation in decision-making over how ODA should be used.

### 11-A | ASSISTANCE FOR NATIONAL FISHERIES DEVELOPMENT

Basic information requirements:	Available online?	Up to date? (Not older than 2 years)	Easy to find?
List of public sector projects related to fisheries and marine conservation in Ghana, funded by bilateral, multilateral and private donors	Partially	No	Yes
Project value	Partially	No	Yes
Project purpose and outputs	Partially	No	Yes
Project evaluations	No		
	To a limited extent	No	To a full extent

#### Available online?

Ghana has received extensive support from several different foreign donors for the development and management of marine

fisheries. Prominent donors include the World Bank, USAID, the European Union, the government of Norway, the government of



Japan and the government of China (ostensibly through the China Development Bank). Complementary information on donor support is also compiled by the International Aid Transparency Initiative (IATI), which identifies other relevant projects and donors for Ghana's fisheries sector.

There are landing pages for information on some donor funded projects provided on the website of the Fisheries Commission and the MoFAD. For the latter, this can be found under the 'Projects' (sub-heading from the homepage's main navigation bar). Similarly, there is a link to information on projects provided on the website of the Fisheries Commission, but subsequent pages are blank.

The information provided by the MoFAD covers two projects, both of which have ended. The World Bank financed project has sub-headings of information that cover the budget and project purpose. However, there are no links to project evaluations. This is despite numerous evaluation reports, including a terminal evaluation, being produced by the project and published by the World Bank.

The website for the Sustainable Fisheries Management Project was not working for the duration of our research. However, the address for this page is the landing site for the website produced by the University of Rhodes Island, which is currently inaccessible due to security issues.

Up to date?

The only projects that national authorities provide information on are those that have already ended: there is no information provided

on current projects, including those funded by USAID and Norway.

Easy to find?

The limited information on previous projects is

easy to find.

11-B | ASSISTANCE FOR FOREIGN FISHERIES DEVELOPMENT

Basic information requirements:	Available online?	Up to date? <i>(Not older than 2 years)</i>	Easy to find?
List of public sector projects related to fisheries and marine conservation in foreign countries, funded by Ghana's government	Not applicable		
Project value			
Project purpose and outputs			
Project evaluations			
	Not applicable		

Available online?

The government of Ghana does not provide official development assistance for the fisheries

sector of foreign countries.



## 12. BENEFICIAL OWNERSHIP

Beneficial ownership – that is, the natural person who ultimately owns or controls a business or transaction – is a topic grabbing global attention. This interest also extends to the fisheries sector. A lack of transparency around ownership of fishing companies, vessels or licenses is linked to several important policy debates, including non-compliance with tax laws, evasion of criminal prosecutions for illegal fishing, corruption and conflicts of interests, and also the excessive concentration of ownership in segments of the fisheries sector.<sup>38</sup>

### 12-A | LEGAL BASIS FOR BENEFICIAL OWNERSHIP TRANSPARENCY

Basic information requirements:	Available online?	Up to date? (The latest legal basis is published online)	Easy to find?
Legal basis for beneficial ownership transparency in Ghana	Yes	Yes	Yes
Ghana's legal definition of beneficial ownership	Yes	Yes	Yes
Thresholds used to determine when ownership and control is disclosed	Yes	Yes	Yes
Disclosure exceptions	Yes	Yes	Yes
	To a full extent	To a full extent	To a full extent

#### Available online?

Ghana originally committed to establishing a Beneficial Ownership Transparency (BOT) regime in 2012. Not much progress was made

until Ghana's Extractive Industries Transparency Initiative (GHEITI) commenced working together with stakeholders to identify the necessary

amendments to existing legislation to implement a BOT regime. At the 2016 Anti-Corruption Summit in London, Ghana committed to establishing a publicly accessible BOT register, together with implementation of several other international initiatives, such as the Extractives Industries Transparency Initiative (EITI) and the Financial Action Task Force (FATF).

The establishment and operations of companies in Ghana is governed by the provisions of the **Companies Act, 2019 (Act 992)**. Act 992 provides that every company is required to keep a register of members and beneficial owners and to furnish the **Registrar General's Department** (as part of the Ministry of Justice)

with information on its members first.

As part of this act, Section 383 defines a beneficial owner in Ghana as an individual, and provides additional clarifications (e.g. regarding substantial control).

The Act and the accompanying *Frequently Asked Questions* document also provide information on the different types of thresholds, depending on the different types of thresholds, depending on the sector the company is in and the type of person the beneficial owner is. Furthermore, clarifications are provided on the information that the RGD will be making publicly available on each beneficial owner (as well as the information that is provided to Competent Authorities of the Government of Ghana).

### Up to date?

The published Companies Act, 2019 is seen as

up to date.

### Easy to find?

The Companies Act, 2019 as well as an accompanying 'Frequently Asked Questions' document can be easily found on the website of

the Registrar General's Department or through external web searches (e.g. using Google).

## 12-B | BENEFICIAL OWNERSHIP REGISTRY

Basic information requirements:	Available online?	Up to date? (Data confirmed on annual basis)	Easy to find?
Beneficial ownership register	No		
Beneficial owner(s) and their interests			
Declarations of shares or interest held indirectly			
Reasons for not specifying any beneficial owners			
Declaring entity			
	No		

### Available online?

One of the novelties of Act 992 is the establishment of the Beneficial Ownership register under Section 373 which provides for the establishment of a Central Register to capture beneficial ownership data of legal persons, including companies limited by shares, companies limited by guarantee, unlimited companies and external companies.

Ghana has included the commitment to a Beneficial Ownership Registry in its Open Government Partnership National Action Plan 2021-23.<sup>74</sup> According to the NGO Open Ownership, this central registry has been launched in 2020 for the entire economy of Ghana.<sup>75</sup> This is coherent with the government's commitment to the OGP, which seeks to now 'ensure data quality and accuracy, data

accessibility and availability as well as effective use of data'. However, access to this registry is not intuitive, as no beneficial ownership information (or even selection) is directly provided and it is therefore unclear, whether this registry actually contains such information.

For our assessment, it is assumed that beneficial ownership information is already collated by the Ghanaian authorities – for example, the provision of beneficial ownership information to the RGD must be included in all company annual returns since March 2021 and it is required information for the Ghana Maritime Authority to register a fishing vessel on the national shipping registry – but such information is not yet made publicly available.

<sup>74</sup> <https://www.opengovpartnership.org/members/ghana/commitments/GH0036/>

<sup>75</sup> <https://egovonline.gegov.gov.gh/RGDPortalWeb/portal/RGDHome/eghana.portal>

12-C | BENEFICIAL OWNERSHIP DISCLOSURE IN FISHERIES

Basic information requirements:	Available online?	Up to date? <i>(New rules/procedures published in last 2 years)</i>	Easy to find?
Rules and procedures for incorporating beneficial ownership in filings by organisations to agencies regulating access to fisheries	Not produced		
	Not produced		

Available online?

Our assessment found no evidence that the national authorities of Ghana provide, or are working towards the establishment, of specific procedures to integrate beneficial ownership

into fisheries rules and regulations (despite the economy-wide applicability of the Companies Act, 2019).

# **TAKING STOCK**

**Online Transparency of Fisheries  
Management Information**

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