

An aerial photograph showing a wide, muddy river flowing through a dense, green forest. The river's water is a turbid, yellowish-brown color, suggesting sediment runoff. The surrounding forest is lush and green, with some areas of exposed earth and what appears to be a small-scale mining operation or cleared area on the right bank. The image is framed by a dark blue border with a yellow wavy line at the bottom.

RESEARCH PAPER

Digging Deeper: Towards a Holistic Understanding of Chinese Participation in Ghana's Artisanal and Small-Scale Gold Mining Sector

Gioia Serena Wang and Elena Weinreich

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Address: #6 Quarcoo Lane

North Airport Residential Area, Accra - Ghana

Email: info@cddgh.org

Website: www.cddgh.org

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Executive Summary

Chinese involvement in Ghana's artisanal and small-scale mining (ASM) sector has become a focal point of national outrage due to its links to environmental degradation and illegality. Drawing on expert interviews and desk research, this working paper finds that Chinese participation is primarily driven by the long-standing structural exclusion of the ASM sector in Ghana's mining economy and its governance.

Undercapitalization, exclusionary licensing systems, inequitable land allocation, and ineffective mineral-wealth redistribution to the benefit of the large-scale mining industry have created incentives for Ghanaian miners, chiefs, and intermediaries to collaborate with Chinese actors in pursuit of capital, technology, and livelihoods. Repeated enforcement-led responses – including militarized crackdowns and blanket bans – have failed to curb foreign involvement or environmental harm because they do not address these underlying political and economic drivers.

This paper thus concludes that reducing illegal Chinese participation requires pro-people formalization strategies that strengthen access to land, finance, training, and environmentally sustainable technologies, while effectively including ASM in dialogue and governance processes. The findings highlight that addressing illegal Chinese participation requires moving beyond punitive, security-led approaches toward structural reform of ASM governance – an insight with direct relevance for Ghana and other West African countries grappling with similar dynamics across small-scale mining sectors.

1.0 Introduction

Few issues in Ghana have generated as much public outrage as artisanal and small-scale gold mining (ASM). Operating within a highly informal system where the boundary between legal and illegal activity is difficult to distinguish¹, the sector has become a focal point of national controversy due to its association with severe environmental degradation, including widespread deforestation² and contamination of major water bodies³. These concerns are encapsulated in a widely cited warning made by a former Minister of Land and Natural Resources in 2018 warning that Ghana could be forced to import potable water by 2030 if current trends continue.⁴

A central driver of this controversy is the illegal involvement of foreign actors, as small-scale gold mining is legally reserved for Ghanaian nationals under the Minerals and Mining Act (2006).⁵ Chinese actors, in particular, have attracted sustained public and political attention for mechanizing a sector characterized for centuries by rudimentary practices.⁶ Their entry into Ghana's ASM sector began in the mid-1990s and intensified alongside rising global gold prices in the early 2010s, reaching a peak of 50,000 miners in 2013⁷. During this period, Chinese actors introduced sophisticated gold mining equipment, known in Chinese as *changfan*, which shifted ASM operations from reliance on pickaxes and shovels to excavators, bulldozers, and dredging platforms.⁸ This transformation sharply intensified environmental harm, accelerating land degradation, increasing cyanide discharge into rivers, and amplifying health risks for surrounding communities.⁹

In response, the Ghanaian government has implemented a series of measures aimed at curbing both Chinese involvement and illegal mining more broadly. These measures include

¹Hilson, G., Hilson, A., Maconachie, R., McQuilken, J. and Goumandakoye, H. (2017). Artisanal and small-scale mining (ASM) in sub-Saharan Africa: Re-conceptualizing formalization and 'illegal' activity. *Geoforum*, 83(1), pp.80–90. doi:<https://doi.org/10.1016/j.geoforum.2017.05.004>.

²An estimated 4,726 hectares of land across seven of Ghana's sixteen regions, an area larger than Brussels, have been cleared through deforestation linked to mining activities. See: Wilderforce & Nunoo, 2024.

³ Around 60 per cent of Ghana's water bodies have been polluted due to mechanised ASM activities. See: Nti *et al.*, 2023.

⁴ GhanaWeb (2018). *Ghana may import water from 2030 - Lands Minister*. [online] GhanaWeb. Available at: <https://www.ghanaweb.com/GhanaHomePage/NewsArchive/Ghana-may-import-water-from-2030-Lands-Minister-619288>.

⁵ Government of Ghana (2006). *Minerals and Mining Act (2006), Act 703*. [online] National Resource Governance Institute. Available at: <https://resourcegovernance.org/sites/default/files/Minerals%20and%20Mining%20Act%20703%20Ghana.pdf>.

⁶ Crawford, G., Agyeyomah, C., Botchwey, G. and Mba, A., (2015). The impact of Chinese involvement in small-scale gold mining in Ghana. International Growth Centre. Available at: <https://www.theigc.org/sites/default/files/2016/08/Crawford-et-al-2015-Final-Report-1.pdf?utm>.

⁷ Ibid.

⁸ Botchwey, G., Crawford, G., Loubere, N. and Lu, J., 2018. South-South labour migration and the impact of the informal China-Ghana gold rush 2008-13 (No. 2018/16). WIDER Working Paper.

⁹ Ibid.

tightening visa restrictions for Chinese nationals¹⁰; banning all foreign participation in the local gold trading market¹¹ as well as the production and use of *changfan* machinery¹²; conducting repeated military raids, arrests, and deportations¹³; and imposing a blanket moratorium on all ASM activities between April 2017 and December 2018¹⁴. While these interventions have reduced the visible presence of Chinese miners across mining sites nationwide, the continued arrest of Chinese nationals¹⁵ and a growing body of recent research indicate that Chinese involvement in Ghana's ASM sector remains prevalent and continues to pose a threat to both the sector and Ghana's environment.¹⁶

The persistence of foreign involvement despite these enforcement efforts points to deeper structural dynamics that extend beyond state capacity or regulatory design alone. Existing scholarship has extensively documented the role of local enablers – including Ghanaian businessmen, chiefs, and local politicians – in facilitating Chinese access to mining sites and licenses, often by fronting concessions within a legal framework that formally reserves ASM licenses for Ghanaian nationals.¹⁷ Against this backdrop, this paper seeks to develop a holistic understanding of foreign, and particularly Chinese, participation in Ghana's ASM sector by examining the incentive structures that sustain these collaborations. Moving beyond one-dimensional framings of foreign involvement in ASM as merely an environmental or security threat, the analysis foregrounds the socio-economic, institutional, and historical drivers that have enabled such participation in the first place.

Drawing on semi-structured interviews with civil society actors, environmental and mining-rights advocacy organizations, academics, mining associations, Ghanaian small-scale miners, and Chinese financiers, this paper finds that Chinese involvement in Ghana's ASM sector cannot be understood outside of its historical context. Namely, the structural marginalization of small-scale mining that followed neoliberal reforms imposed by the IMF and World Bank in the 1980s, which overwhelmingly favored the development of the large-scale mining sector.¹⁸ The resulting neglect of the ASM sector – characterized by land dispossession, unequal mineral wealth

¹⁰ BI Africa Contributor (2025). *Illegal gold mining: Ghana tightens visa rules for Chinese nationals*. [online] Business Insider Africa. Available at: <https://africa.businessinsider.com/local/lifestyle/illegal-gold-mining-ghana-tightens-visa-rules-for-chinese-nationals/212bh6s>.

¹¹ Ibid.

¹² Ghana Web (2025a). *Galamsey: EPA bans 'Changfan' machines*. [online] GhanaWeb. Available at: <https://www.ghanaweb.com/GhanaHomePage/NewsArchive/Galamsey-EPA-bans-Changfan-machines-2007247>.

¹³ Kumah, R., (2023). Chinese participation in Ghana's illegal small-scale gold mining: Linking local pull factors to distributional inequities. *The Extractive Industries and Society*, 16, pp.1. <https://www.sciencedirect.com/science/article/pii/S2214790X23001466?via%3Dihub>

¹⁴ Crawford, G. and Botchwey, G. (2018) 'Militarisation and criminalisation of artisanal and small-scale gold mining: the state and the so-called "galamsey menace" in Ghana', *Review of African Political Economy*, 45(156), pp. 321–334. Available at: <https://www.jstor.org/stable/48540845>

¹⁵ See Kanarku (2026); Ghana Web (2025b); Asare Donko (2025);

¹⁶ See Kumah (2022); Aswi-Boateng & Akudugu (2020)

¹⁷ See Ocquaye (2023); Bofo, Paalo & Dotsey (2019); Crawford & Botchwey (2019); Ofosu-Mensah (2021)

¹⁸ Hilson, G. and Potter, C. (2005). Structural Adjustment and Subsistence Industry: Artisanal Gold Mining in Ghana. *Development and Change*, 36(1), pp.106. doi:<https://doi.org/10.1111/j.0012-155x.2005.00404.x>.

distribution, chronic undercapitalization of the sector, and exclusionary licensing regimes – has incentivized Ghanaian miners, chiefs, and intermediaries to collaborate with Chinese actors in pursuit of capital, technology, and viable livelihoods, despite repeated state crackdowns. These findings align with long-standing scholarly calls for policymakers to adopt more nuanced understandings of ASM sector dynamics, rather than relying on narrow enforcement-based approaches.¹⁹

Given ASM’s central role in Ghana’s economy – supporting over five million livelihoods²⁰ and accounting for nearly 40 per cent of gold production²¹ – understanding and addressing the structural conditions that enable local facilitation of Chinese participation is critical for effective environmental governance and inclusive economic development. Policies that have thus far sought to address environmental degradation through outright bans, without confronting these underlying drivers, have produced responses that are both ineffective and socially costly.²²

This paper proceeds as follows. The next section outlines the methodology and analytical approach. Section 3 traces the political economy of the historical governance of Ghana’s ASM sector and its role in enabling Chinese participation. Section 4 examines the nature and modalities of Chinese involvement, focusing on networks, partnerships, and governance gaps. The final section discusses the policy implications and proposes governance reforms aimed at addressing the structural drivers of foreign involvement and supporting a more inclusive and sustainable ASM sector.

¹⁹ See Crawford & Botchwey (2019); Arthur-Holmes, et al., 2022; Hilson & Maconachie (2022); Buxton (2013)

²⁰ McQuilken, J. and Hilson, G., 2016. Artisanal and small-scale gold mining in Ghana. Evidence to inform an ‘action dialogue’. IIED, London. Available at: <https://www.iied.org/sites/default/files/pdfs/migrate/16618IIED.pdf>

²¹ Agbetiloye, A. (2025). *Ghana looks to get \$12bn a year from small-scale gold mining*. [online] Business Insider Africa. Available at: <https://africa.businessinsider.com/local/markets/ghana-looks-to-get-dollar12bn-a-year-from-small-scale-gold-mining/2c5hbrf>

²² Oforu, G. and Sarpong, D. (2023). Defying the gloom: In search of the ‘golden’ practices of small-scale mining operations. *Environmental Science & Policy*, 139, pp.62–70. doi:<https://doi.org/10.1016/j.envsci.2022.10.013>.

2.0 Methodology

This study used thematic analysis (TA), which is a commonly used method for analyzing qualitative data across different disciplines, including health research, education and social sciences.²³ The methodology provides a systematic yet flexible framework for identifying, analyzing, and reporting patterns in qualitative data since it does not depend on a theoretical structure. This flexibility was essential to the research design, which adopted a hybrid inductive-deductive approach that combined data from fifteen semi-structured interviews with an extensive desk study of academic literature and news reports in both English and Chinese.

Drawing on the desk study, the interview design followed a deductive, literature-driven structure, while incorporating participants' expertise and field experience to examine key dimensions of Chinese involvement in Ghana's ASM sector. At the same time, the semi-structured format allowed participants to introduce new themes and concerns throughout the interview process, generating inductive, data-driven insights that refined and expanded the analytical framework.²⁴

To move beyond dominant narratives that frame Chinese involvement in Ghana's ASM sector primarily through criminality and with limited stakeholder engagement²⁵, the study deliberately sampled interviewees with heterogeneous professional backgrounds and firsthand experience in the sector (see *Figure 1*). This multi-stakeholder approach strengthened data reliability, enhanced policy relevance, and supported a more inclusive knowledge-production process by incorporating diverse perspectives.²⁶ Ultimately, it enabled a more nuanced examination of the factors sustaining the continued illegal presence of Chinese financiers and miners, particularly the enabling role of local actors despite severe environmental degradation and widespread public opposition.

²³ Ahmed, S.K., Mohammed, R.A., Nashwan, A.J., Ibrahim, R.H., Abdalla, A.Q., Ameen, B.M.M. and Khidhir, R.M. (2025). Using Thematic Analysis in Qualitative Research. *Journal of Medicine, Surgery, and Public Health*, [online] 6(6), p.100198. doi:<https://doi.org/10.1016/j.glmedi.2025.100198>.

²⁴ Ibid.

²⁵ Kumah, R., (2023). Chinese participation in Ghana's illegal small-scale gold mining: Linking local pull factors to distributional inequities. *The Extractive Industries and Society*, 16, pp. 1-9
. <https://www.sciencedirect.com/science/article/pii/S2214790X23001466?via%3Dihub>

²⁶ Duea, S. R., Zimmerman, E. B., Vaughn, L. M., Dias, S., & Harris, J. (2022). A Guide to Selecting Participatory Research Methods Based on Project and Partnership Goals. *Journal of Participatory Research Methods*, 3(1). <https://doi.org/10.35844/001c.32605>

Figure 1. List of Research Participants by Organization and Role

No.	Participant Name/Organization Name	Affiliated Organization	Participant Category
1	Emmanuella Appiah	Ghana Youth Environmental Movement (GYEM)	Environmental Advocacy Group
2	Albert Katako	Civic Response	Environmental Advocacy Group
3	Hannah Owusu-Koranteng	WACAM	Human Rights and Environmental Mining Advocacy Group
4	Women in Mining Staff	Women in Mining	Mining Co-operative
5	Richard Hato-Kuevor	Independent	Consultant
6	Dr. Gideon Ofose-Peasah	Independent	Consultant
7	Dr. Richard Aidoo	Coastal Carolina University	Academic Researcher
8	Dr. Gabriel Botchwey	University of Winneba	Academic Researcher
9	Dr. Richard Kumah	Queen's University	Academic Researcher
10	Nathaniel Ocquaye	London School of Economics	Academic Researcher
11	Isaac	N/A	Ghanaian Small-Scale Gold Miner
12	Richard Ellimah	Center for Social Impact Studies (ceSIS)	Academic Researcher
13	Dr. Francis Xavier Tuokuu	Independent	Consultant
14	Zhang ²⁷	N/A	Chinese Construction Executive with Clients in the ASM Gold Mining Industry
15	Liang ²⁸	N/A	Chinese Entrepreneur with Illegal Gold Mines in Bibiani ²⁹ and Kasoa ³⁰

²⁷ Zhang is a pseudonym used at the source's request to protect his identity.

²⁸ Liang is a pseudonym used at the source's request to protect her identity.

²⁹ Bibiani is a town Ghana's Western North region.

³⁰ Kasoa is a town in Ghana's Central Region.

2.1. Analytical Process: Braun and Clark's (2006) Six-Phase Framework

The thematic analysis followed Braun and Clarke's (2006) six-phase framework³¹. The following section briefly outlines how each stage of the analysis was applied in this working paper.

The first phase, data familiarization, involved iterative engagement with the dataset, beginning with the immediate transcription of all sixteen interviews and a close reading of their contents to note initial impressions. Through this process, we identified key preconceptions embedded in the term “galamsey,” despite its origins in the phrase “gather and sell”, has been widely utilized by the media and policymakers to denote illegal small-scale mining. This usage often conflates legal and illegal activities, stigmatizing the entire sector and obscuring important operational distinctions. More fundamentally, environmental degradation occurs across both legal and illegal operations, including large-scale mining, rendering a narrow focus on illegality analytically insufficient for understanding the sector's challenges. Accordingly, this study adopts the term artisanal and small-scale mining (ASM) – a globally recognized concept³² that aligns with international scholarship and captures the full spectrum of small-scale mining activities, from individual artisanal practices to more mechanized operations.

In the second phase, recurring topics across the interviews were systematically coded using the qualitative data analysis software MAXQDA. Initial descriptive codes included the nature of Chinese involvement in Ghana's ASM sector, barriers to addressing illegal ASM, the developmental potential of ASM, and linkages between governance in the large-scale and small-scale mining sectors. Codes that fell outside the scope of the study – such as those focused primarily on bilateral China–Ghana relations – were subsequently removed.

The third phase involved organizing these codes into three interpretive themes that captured broader structural dynamics rather than surface-level descriptions: (1) the historical neglect of ASM in Ghana's mining governance as a driver of Chinese participation; (2) the nature and modalities of Chinese involvement in the sector; and (3) policy pathways for developing ASM and reducing reliance on Chinese participation. In the fourth and fifth phases, these themes were reviewed and refined through repeated engagement with the coded data to ensure internal coherence, analytical distinctiveness, and alignment with the study's scope.

The final phase translated the refined themes into a coherent analytical narrative. Drawing on a historical political-economy perspective, the analysis traces contemporary patterns of illegal Chinese involvement in ASM to the sector's long-standing marginalization under Ghana's mining

³¹ Braun, V. and Clarke, V. (2006). Using Thematic Analysis in Psychology. *Qualitative Research in Psychology*, 3(2), pp.77–101. doi:<https://doi.org/10.1191/1478088706qp063oa>.

³² The World Bank (2024). Achieving Sustainable and Inclusive Artisanal and Small-Scale Mining (ASM):A Renewed Framework for World Bank Engagement. [online] Available at: <https://openknowledge.worldbank.org/server/api/core/bitstreams/cab95ce4-781f-42df-9c4d-912c55834c1b/content>.

governance framework and connects it to the networks and mechanisms that form contemporary Chinese involvement within the sector.

While this analytical approach yields important insights, this study is not without limitations. In particular, the number of Ghanaian ASM operators interviewed was limited due to the time constraints of this study and the sensitivity of the topic. Given the extent to which such actors are criminalized and excluded from public discourse, future research should therefore prioritize their greater inclusion for developing a more comprehensive understanding of the sector's dynamics and informing effective and inclusive governance strategies.

3.0 Historical Neglect of ASM in Ghana's Mining Governance as Key Driver of Chinese Participation

The historical evolution of Ghana's contemporary mining economy, together with changes in its political governance, has been a crucial enabling factor for Chinese participation from the early 2000s onward. Artisanal mining has been practiced in Ghana for centuries³³ and has long been embedded in local livelihoods, as highlighted by Richard Ellimah, founder of the Center for Social Impact Studies: "it has been part of our heritage and part of the local, indigenous, economy since before colonialism."³⁴ Under British colonial rule, mechanical mining was introduced alongside discriminatory legislation that excluded indigenous miners from meaningful participation in the mining economy.³⁵ Following independence in 1957, the artisanal sector was allowed to operate largely undisturbed, despite its largely unregulated nature.³⁶ This changed from the 1980s onwards, when countries across Africa, Asia and Latin America underwent neoliberal Structural Adjustment Programs (SAP) under auspices of the International Monetary Fund and World Bank. In Ghana the SAP commenced as the Economic Recovery Program in 1983 (ERP).³⁷ The economic reforms implemented under the ERP ushered in a new political and economic paradigm, leading to a "shift in ownership, technology, and ideology"³⁸ within the mining sector that significantly reshaped the conditions under which indigenous artisanal miners operated.³⁹

While the ERP legalized the ASM sector for the first time through the Small-Scale Gold Mining Law, 1989 (PNDCL 218), an important step toward formalization, its incorporation of the sector proved contradictory when viewed through a historical lens. The reforms introduced under the ERP reversed the earlier Nkrumahist mining policy, which prioritized local ownership, by "allow[ing] for the liberalization and privatization of the sector."⁴⁰ This shift opened Ghana's mining industry to foreign direct investment (FDI), leading to the privatization of previously state-

³³ Yankson, P.W.K. and Gough, K.V. (2019). Gold in Ghana: The effects of changes in large-scale mining on artisanal and small-scale mining (ASM). *The Extractive Industries and Society*, 6(1), pp.120–128. doi:<https://doi.org/10.1016/j.exis.2018.09.009>.

³⁴ Ellimah, R. (2025) Interview with Ellimah R, founder and analyst at the Center for Global Impact Studies, Interviewed by Gioia Serena Wang and Elena Weinreich,, CDD-Ghana,30 May 2025.

³⁵ Yankson, P.W.K. and Gough, K.V. (2019). Gold in Ghana: The effects of changes in large-scale mining on artisanal and small-scale mining (ASM). *The Extractive Industries and Society*, 6(1), pp.120–128. doi:<https://doi.org/10.1016/j.exis.2018.09.009>.

³⁶ Ibid.

³⁷ McQuilken, J. and Hilson, G. (2016) 'Front matter', in *Artisanal and small-scale gold mining in Ghana: Evidence to inform an 'action dialogue'*. London: International Institute for Environment and Development, pp. 2–3. Available at: <http://www.jstor.org/stable/resrep02683.1>.

³⁸ Owusu-Koranteng, H. (2025) Interview with Owusu-Koranteng, H., Executive Director of WACAM. Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on 8 January 2025.

³⁹ Ibid.

⁴⁰ Tuokuu, F, X., (2025) Interview with F, X, Tuokuu, Independent Expert Interviewed by Gioia Serena Wang and Elena Weinreich , CDD-Ghana, 09 June 2025

owned mines and the gradual expansion of large-scale industrial mining.⁴¹ These reforms generated what has been described as a “large-scale mining bias”,⁴² as the government increasingly prioritized “the development of and rent-seeking from the large-scale mining (LSM) industry.”⁴³ This bias resulted in the marginalization and neglect of the ASM sector, intensifying competition over mineral resources and contributing to persistent conflict.⁴⁴ As Richard Hato-Kuevor, an environmental policy analyst with extensive experience in the NGO sector, observes “the lack of an intentional focus being given to the sector, as compared to the large-scale sector, has largely contributed to the situation we find ourselves in today.”⁴⁵

This dynamic was further reinforced by the state’s broader objective, under direction of the SAPs, “to get as much land (...) and make it available for mining corporations,” which led to the displacement of indigenous farmers and small-scale miners from the 1980s onward.⁴⁶ For example, many of the lands that were redistributed for industrial mining “had farmers working on them (...) who had productive crops on them.”⁴⁷ As a consequence, livelihoods were lost and many farmers ventured into ASM from here. Similarly, when South African gold mining firm Gold Fields acquired a state-owned mine in western Ghana and commenced operations in 1997, approximately 5,000 artisanal miners were displaced from the awarded concession.⁴⁸ Displacement pressures were compounded by a technological shift within large-scale mining from labor-intensive underground operations to surface mining, which “stiffened competition for many subsistence artisans and entrepreneurs” over access to land.⁴⁹⁵⁰ As Richard Ellimah recalled, prior to the 1980s, “mining used to be purely underground during the time of our first president [Kwame Nkrumah], who nationalized all those mines.”⁵¹

The transition to surface mining also resulted in significant retrenchment within the large-scale mining labor force. Between 1985 and 2021, a drastic reduction occurred from 485,000

⁴¹ Hilson, G. and Potter, C. (2005). Structural Adjustment and Subsistence Industry: Artisanal Gold Mining in Ghana. *Development and Change*, 36(1), pp.106. doi:<https://doi.org/10.1111/j.0012-155x.2005.00404.x>.

⁴² Ellimah, R. (2025) Interview with Ellimah R, founder and analyst at the Center for Global Impact Studies, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, 30 May 2025.

⁴³ Ibid.

⁴⁴ Ibid.

⁴⁵ Hato-Kuevor, R. (2025) Interview with R., Hato-Kuevor Former Analyst at the Center for Global Impact Studies, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on January 2025.

⁴⁶ Kumah, R. (2025) Interview with Kumah R., Independent Expert, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on 15 January 2025

⁴⁷ Hato-Kuevor, R. (2025) Interview with R., Hato-Kuevor Former Analyst at the Center for Global Impact Studies, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on January 2025

⁴⁸ Hilson, G. and Potter, C. (2005). Structural Adjustment and Subsistence Industry: Artisanal Gold Mining in Ghana. *Development and Change*, 36(1), pp.106. doi:<https://doi.org/10.1111/j.0012-155x.2005.00404.x>.

⁴⁹ Ibid.

⁵⁰ Katako, A. (2024) Interview with Katako A, Civic Response, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on 19 December 2024

⁵¹ Ellimah, R. (2025) Interview with Ellimah R, founder and analyst at the Center for Global Impact Studies, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, 30 May 2025.

employees to merely 12,100^{52,53}. Yet by 2014, large-scale mineral exploration companies controlled approximately 90 per cent of Ghana's mining leases.⁵⁴ Consequently, many displaced workers and farmers migrated into ASM in search of alternative livelihoods.⁵⁵ As Hannah Owusu-Koranteng, Executive Director of the mining-impacted communities advocacy organization WACAM explained: "there is a connection between the introduction of large-scale strip mining (...) and the influx of small-scale mining, community mining, galamsey mining – all kinds of [local] mining."⁵⁶ Beyond these material displacements, interviewees repeatedly emphasized the asymmetry in state attention between large-scale and small-scale mining. As Dr. Gabriel Botchwey, lecturer of political science at the University of Education Winneba, observed:

*"Because of their [the large-scale mining sector's] taxes and royalties, much of the attention has gone there, and for a long-time small-scale mining was neglected. Nobody cared so much (...) the state did not set out to create any serious mechanism to support them."*⁵⁷

This captures the paradoxical nature of PNDCL 218: while the law sought to regularize the ASM sector, it failed to provide the institutional support necessary for its development. This long-standing structural marginalization, combined with the poverty-driven character of both legal and illegal ASM⁵⁸, has created conditions that function as push factors for foreign involvement. These dynamics are elaborated in the following sections:

4.1 Undercapitalization and Financial Exclusion

A first and foundational mechanism through which the historical neglect of the ASM sector has facilitated Chinese participation is chronic undercapitalization. Across our interviews⁵⁹ and the existing literature⁶⁰, ASM operators, both licensed and unlicensed, consistently described limited access to capital as a defining constraint on their operations. As Dr. Gabriel Botchwey highlights, even after securing a concession, "you have to go and look for your own money."⁶¹

⁵² Hilson, G. and Potter, C. (2005). Structural Adjustment and Subsistence Industry: Artisanal Gold Mining in Ghana. *Development and Change*, 36(1), pp.106. doi:<https://doi.org/10.1111/j.0012-155x.2005.00404.x>.

⁵³ Ghana Chamber of Mines (2021): Mining Industry Statistics and Data. Available at <https://ghanachamberofmines.org/wp-content/uploads/2022/09/Facts-and-Figures-2021.pdf>

⁵⁴ Hilson, G., Hilson, A. and Adu-Darko, E. (2014). Chinese participation in Ghana's informal gold mining economy: Drivers, implications and clarifications. *Journal of Rural Studies*, 34, pp.292–303. doi:<https://doi.org/10.1016/j.jrurstud.2014.03.001>.

⁵⁵ Hilson, G. and Potter, C. (2005). Structural Adjustment and Subsistence Industry: Artisanal Gold Mining in Ghana. *Development and Change*, 36(1), pp.106. doi:<https://doi.org/10.1111/j.0012-155x.2005.00404.x>.

⁵⁶ Owusu-Koranteng, H. (2025) Interview with Owusu-Koranteng, H., Executive Director of WACAM. Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on 8 January 2025.

⁵⁷ Botchwey, G. (2025) Interview with Botchwey, G., University of Winneba, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on 20 December 2024

⁵⁸ This has been widely documented in existing literature (Hilson and McQuilken, 2014; Andrews, 2015) and confirmed by multiple interviewees (Aidoo, 2025; Appiah, 2025; Botchwey, 2025; Isaac, 2025; Ellimah, 2025).

⁵⁹ Interviews: Botchwey, 2025; Hato-Kuevor, 2025; Kumah, 2025; Ofosu-Peasah, 2025

⁶⁰ See Eshun & Okyere, 2017 and Hilson, G., Hilson, A. & Adu-Darko, 2014

⁶¹ Botchwey, G. (2025) Interview with Botchwey, G., University of Winneba, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on 20 December 2024

Formal registration does little to mitigate this challenge. Many legally registered miners remain unable to access credit that could be used to stabilize, expand, or mechanize their operations.⁶²

This financing gap is rooted in structural features of Ghana's financial and regulatory environment. As researcher Dr. Richard Kumah explained, commercial banks typically require geological data to assess risk and forecast financial returns.⁶³ Yet most ASM operators lack the financial resources and technical capacity to conduct geological prospecting in the first place.⁶⁴ This creates a self-reinforcing trap as without capital, miners cannot generate the data required to access capital.⁶⁵ Existing studies corroborate this dynamic, demonstrating that geological information is routinely treated as a form of collateral by Ghanaian banks, effectively excluding small-scale miners from formal credit markets.⁶⁶

⁶⁷ These barriers have been further reinforced by the state's increasingly punitive approach toward ASM. ⁶⁸ Interviewees consistently highlighted a strong link between government crackdowns and the financial sector's growing reluctance to engage with ASM operators. As Dr.



Botchwey recalled: “from 2015 (...) a lot of banks were willing to give loans for equipment, but then everything stopped because of the government crackdown.”⁶⁹ Here, he is referring to *Operation Vanguard*, launched in 2017, a military task force aimed at curbing illegal ASM by seizing mining equipment and shutting down mining sites.⁷⁰ The operation was accompanied by an intensive public campaign led by the media

Figure 1 Destruction of mining equipment during Operation Vanguard

⁶² Eshun, P.A. and Okyere, E. (2017). Assessment of the Challenges in Policy Implementation in the Small Scale Gold Mining Sector in Ghana – A Case Study. *Ghana Mining Journal*, 17(1), pp.58. doi:<https://doi.org/10.4314/gm.v17i1.6>.

⁶³ Kumah, R. (2025) Interview with Kumah R., Independent Expert, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on 15 January 2025

⁶⁴ Ibid.

⁶⁵ Ibid.

⁶⁶ See IISD, 2019; Arthur-Homes & Ofori, 2024

⁶⁷ Source: Jacobs Palinwinde, D. (March 2021). “Operation Vanguard Destroys mining equipment in the Western Region”. Citi Newsroom. Online available at: <https://citinewsroom.com/2021/03/operation-vanguard-destroys-mining-equipment-in-western-region/>

⁶⁸ For a social justice critique of militarized approaches see Phil & Asamoah-Gyadu (2025)

⁶⁹ Botchwey, G. (2025) Interview with Botchwey, G., University of Winneba, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on 20 December 2024

⁷⁰ Hilson, G. and Maconachie, R. (2020). For the Environment: An Assessment of Recent Military Intervention in Informal Gold Mining Communities in Ghana. *Land Use Policy*, 96, p.104706. doi:<https://doi.org/10.1016/j.landusepol.2020.104706>.

organization Citi FM, which played a central role in shaping public discourse around ASM (see Infobox 1)⁷¹.

Dr Gideon Ofori-Peasah further explained that such policy volatility has rendered the sector prohibitively risky for lenders: “The banks do not want to work with them [ASM miners], because government policy can change at any point in time. If banks give money to miners and then there is a ban, most debtors will default.”⁷² When combined with the legacy of the SAP-era reforms – which had already placed local miners at a disadvantage relative to foreign large-scale

Infobox 1: The Twofold Role of the Media

The Interviews highlighted the ambivalent role of Ghana's media in shaping responses to artisanal and small-scale mining (ASM). While it has exposed corruption and environmental degradation, dominant narratives have masked structural drivers and fuelled stigmatization of the sector.

A key driver for this is the widespread conflation of legal and illegal ASM through the blanket term *galamsey*, creating the impression that all small-scale mining is illicit. As Ellimah observed, “some of our most prominent media houses do not even know the difference between *galamsey* and small-scale mining,” overlooking licensed and environmentally responsible practices. Dr. Gideon Ofori-Peasah attributed this to a lack of subject-specific journalism, noting most reporters are generalists with limited training in complex sectors like mining. The *StopGalamsey* campaign, launched by Citi FM and Citi TV, exemplified this dynamic. While it mobilized public attention and political will, it also contributed to Operation Vanguard and its blanket ban on both legal and illegal ASM. Several respondents criticized the campaign for its narrow environmental framing and limited appreciation of the sector's developmental dimensions. As Mr. Isaac noted, while miners are willing to engage, coverage focuses exclusively on blame: “*the media [keeps] saying the small-scale miners are spoiling the place,*” without interrogating why people feel compelled to mine in the first place.

This is further compounded by the “LSM-Bias” shaping media discourses. While ASM actors are frequently depicted as lawless and environmentally irresponsible, LSM operations receive comparatively limited scrutiny despite significant environmental footprints. Ms. Owusu-Koranteng described this imbalance as a form of “*media capture*” by powerful corporate interests, a global phenomenon not limited to Ghana alone.

As proposed by Dr. Toukuu, a shift in media discourse is needed, away from portraying ASM solely as an environmental problem towards engaging with questions of livelihood, rural development, sustainable reform and economic justice. Such reframing would enable more balanced debate and support policies addressing root causes rather than symptoms.

⁷¹ CitiFm (2017). *Operation Vanguard has been a success – Nana Addo*. [online] Citi 97.3 FM - Relevant Radio. Always. Available at: <https://citifmonline.com/?p=387038>

⁷² Ofori-Peasah, G. (2025) Interview with Ofori-Peasah, G, Independent Expert, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, 18 December 2024

mining – this enforcement-heavy approach has left ASM operators with virtually no access to formal or state-backed financing mechanisms. As Dr. Richard Kumah summarized, “they don’t have a single government-funded scheme where they can go and access loans, so they are always looking for external sources.”⁷³

In this context, the arrival of Chinese miners and financiers represented, for many ASM operators, the first meaningful opportunity to access both capital and modern mining technology. As Dr. Gabriel Botchwey illuminates, “most small-scale miners were struggling for a long time until the arrival of Chinese technology, when it became possible to access machines, money, and other inputs....it was a happy arrangement for them”,⁷⁴ Chinese mining machinery allows significantly higher gold recovery rates than artisanal methods or locally available technologies, further reinforcing its appeal.⁷⁵ With limited technical and financial support from the state, Chinese financiers and miners have filled a critical gap.⁷⁶ As Richard Ellimah observed, even relatively well-resourced Ghanaian license holders rarely reinvest in the sector, as their capital base and technical expertise remain limited compared to Chinese operators.⁷⁷ In the absence of sustained government support, collaboration with Chinese partners has therefore become central to the economic viability of many ASM operations.

4.2 Licensing Barriers and Legal Exclusion

Financial exclusion is closely intertwined with a second mechanism – an arduous and exclusionary licensing framework that reflects the long-standing marginalization of ASM within Ghana’s mining governance regime. Even where capital constraints can be partially addressed, many ASM operators remain unable to obtain legal status. Once court fees, stamp duties, environmental assessments (which cost up to \$3,500)⁷⁸, and stool land registrations are included, a small-scale mining license costs between \$4,000 and \$5,000 – an amount interviewees consistently described as prohibitive for what they termed “poverty-driven” miners.⁷⁹

⁷³ Kumah, R. (2025) Interview with Kumah R., Independent Expert, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on 15 January 2025

⁷⁴ Botchwey, G. (2025) Interview with Botchwey, G., University of Winneba, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on 20 December 2024

⁷⁵ Ellimah, R. (2025) Interview with Ellimah R, founder and analyst at the Center for Global Impact Studies, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, 30 May 2025.

⁷⁶ Ibid.

⁷⁷ Ibid.

⁷⁸ Hilson, G. and Maconachie, R. (2020). For the Environment: An Assessment of Recent Military Intervention in Informal Gold Mining Communities in Ghana. *Land Use Policy*, 96, p.104706. doi:<https://doi.org/10.1016/j.landusepol.2020.104706>.

⁷⁹ Hilson, G., Hilson, A. and Adu-Darko, E. (2014). Chinese participation in Ghana’s informal gold mining economy: Drivers, implications and clarifications. *Journal of Rural Studies*, 34, pp.292–303. doi:<https://doi.org/10.1016/j.jrurstud.2014.03.001>.

⁸⁰ Emanuella Appiah, National Coordinator of the Ghana Youth Environmental Movement (GYEM) affirmed the centrality of poverty and the quest for livelihoods, as a key driver for migration into the ASM sector and rising environmental degradation.



Figure 2 GYEM community engagement in Asiakwa, illustrating the importance of community-centered approaches to environmentalism.

She noted that many miners are aware of the negative environmental impact but feel like they have no other choice given the broader economic situation of the country.⁸¹ Drawing on findings from GYEM's community-based Anti-Galamsey Campaign in Asiakwa, Eastern Region (2021), she emphasized that environmental advocacy requires an intersectional approach: “if this amount of people depend on Galamsey for their livelihood, it

makes it very difficult for all the [environmental] advocacy we are doing to be effective.”⁸² . Isaac, a Ghanaian small-scale miner also gave voice to this reality:

“Most of the youth don't have anywhere to go. (...) how many industries are there in Ghana that can feed the youth? (...) Even the farming, it is something that is good, but we don't have the equipment to farm (...) If I had the equipment today, what would mining be for me? I know farming is more sustainable too. So, my mind is that, if I go into mining, that is where I can get quick money to be able to do my farming.”⁸³

The existing financial barriers that Ghanaian ASM operators struggle with are further compounded by a centralized and administratively burdensome licensing process. Since the Minerals Commission is the sole licensing authority, applicants are required to travel to Accra, adding further costs and logistical hurdles⁸⁴. Against this backdrop, Dr. Kumah emphasized the importance of accounting for miners’ actual capacity to comply with formal requirements: “when you criminalize the activity and the people cannot comply, you do not take into account their capacity to comply. They cannot get the resources. They cannot even do the paperwork to get a

⁸⁰ Source: GYEM Website. Anti-Galamsey campaign 2023. Available at <https://gyemgh.org/campaign/anti-galamsey-campaign/>

⁸¹ Appiah E. (2024) Interview with Appiah E., national coordinator of Ghana Youth Environmental Movement (GYEM), Interviewed by Gioia Serena Wang and Elena Weinreich on 17 December 2024.

⁸² Ibid.

⁸³ Isaac (2025) Interview with Isaac, Ghanaian small-scale miner, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana on 1 March 2025.

⁸⁴ Kumah, R. (2025) Interview with Kumah R., Independent Expert, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on 15 January 2025

license.”⁸⁵ In practice, this disconnect has contributed to the criminalization of miners who are structurally unable to formalize their operations, reinforcing cycles of informality rather than facilitating meaningful sectoral regulation.

4.3 Inequities in Land Allocation between ASM and LSM

Licensing constraints are further compounded by deep-seated inequities in land allocation between ASM and foreign dominated large-scale mining. As Kumah (2023) argues, “systemic distributional inequalities in the mining land regime”⁸⁶ are a key consequence of the historical ASM neglect that has encouraged Ghanaian actors to seek cooperation with the Chinese. Government-designated ASM areas frequently fail to meet demand, largely due to sustained competition with the large-scale mining sector, which continues to receive priority access to mineral-rich land.⁸⁷ As a result, access to land has become increasingly competitive within ASM itself. Miners with greater financial resources, political connections, or technical capacity are better positioned to secure productive concessions, while those with fewer resources are often allocated marginal or unproductive land.⁸⁸ For many operators, this imbalance renders legal mining economically unviable. In this context, collaboration with Chinese miners – who possess superior geo-prospecting capabilities – offers a pathway to identifying and accessing viable gold-bearing deposits that would otherwise remain inaccessible.⁸⁹

Building on this point, Dr. Kumah explained that such collaborations frequently unfold in legally ambiguous or overtly illegal spaces. He noted that some ASM operators partner with Chinese miners to extract gold at night from concessions legally granted to large-scale companies, often driven by the belief that the land rightfully belongs to their families or traditional authorities.⁹⁰ As he emphasized, “they’re hungry, they want to survive, and the Chinese are there to help them.”⁹¹ For many participants, these arrangements are therefore not primarily motivated by profit maximization, but by livelihood survival and a sense of resistance. In this sense, Chinese participation becomes embedded within broader struggles over land access, legitimacy, and economic survival.⁹²

⁸⁵ Ibid.

⁸⁶ Kumah, R., (2023). Chinese participation in Ghana's illegal small-scale gold mining: Linking local pull factors to distributional inequities. *The Extractive Industries and Society*, 16, pp.

2. <https://www.sciencedirect.com/science/article/pii/S2214790X23001466?via%3Dihub>

⁸⁷ Ibid.

⁸⁸ Ibid.

⁸⁹ Ibid, pp.6.

⁹⁰ Kumah, R. (2025) Interview with Kumah R., Independent Expert, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on 15 January 2025

⁹¹ Ibid.

⁹² Ibid.

4.4 Unequal Mineral Wealth Distribution and Local Resistance

These dynamics are further reinforced by inequities in the distribution of mineral wealth generated by large-scale mining. Interviewees consistently emphasized that while large-scale companies pay taxes and royalties to the state, mining-affected communities 'bear the brunt of the cost of mining on their lands' and see little tangible benefits in return⁹³. Empirical research supports these perceptions. Kumah (2023) identifies inequities in Ghana's mineral wealth distribution framework as a key motivator for local collaboration with Chinese actors⁹⁴. Although the Minerals Development Fund Act (2016) mandates that 20% of royalties be allocated to local development, elite capture, discretionary allocation, and misuse of funds have significantly undermined its effectiveness.⁹⁵ As a result, compensation mechanisms have failed to address environmental damage or deliver meaningful socio-economic benefits to affected communities. Furthermore, mining companies already benefit from a liberalised fiscal regime — another legacy of the ERP— that reduces their tax liability to the state, with royalty payments as low as 5%⁹⁶. Therefore, a crucial bottleneck for more equitable wealth allocation is the state's inability to generate significant revenue from Large-Scale Mining (LSM) operations, which could be channelled into community development through initiatives such as the Minerals Development Fund (MDF). According to Oshionebo (2020)⁹⁷ this is a continent-wide issue, as “fiscal regimes have largely failed to enhance the economic development of African countries due to their generous nature.” To address some of these inequities, the Government of Ghana in January 2026 has initiated the adjustment of Ghana’s mining legislature, a sign that these structural bottlenecks within the sector are increasingly difficult to ignore.

In this context, engagement in unlicensed ASM – often in collaboration with Chinese financiers and operators – can be understood as a form of livelihood survival and resistance to perceived distributive injustice. As Albert Katako, Head of Programs at Ghanaian environmental policy NGO Civic Response noted, mining communities heavily affected by large-scale operations “see no development (...) and experience much more poverty.”⁹⁸ Existing studies similarly document limited community participation in decision-making and royalty allocation, alongside the weak developmental impact of corporate social responsibility (CSR) initiatives.⁹⁹ As Nathaniel Ocquaye, researcher at the London School of Economics, further argued, CSR initiatives that

⁹³ Ibid.

⁹⁴ Kumah, R., (2023). Chinese participation in Ghana's illegal small-scale gold mining: Linking local pull factors to distributional inequities. *The Extractive Industries and Society*, 16, pp.

2. <https://www.sciencedirect.com/science/article/pii/S2214790X23001466?via%3Dihub>

⁹⁵ Ibid.

⁹⁶ Minerals and Mining Amendment Act 794, 2010

⁹⁷ Oshionebo, Evaristus (2020): Fiscal Regimes for Mineral Exploitation. In: *Mineral Mining in Africa*: Routledge. Available at <https://doi.org/10.4324/9781351055543>.

⁹⁸ Katako, A. (2024) Interview with Katako A, Civic Response, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on 19 December 2024

⁹⁹ See CDD, 2023; Ayee, J., et al., 2011; Wan, 2014; Amponsah-Tawiah & Dartey-Baah (2011); Sarpong, 2017; Boateng, 2017; Hira & Busumtwi-Sam (2018)

follow environmental damage or prioritize infrastructure serving mining operations “raise serious questions about whose interests they ultimately serve.”¹⁰⁰

These distributive failures are exacerbated by significant information asymmetries surrounding compensation and revenue-sharing mechanisms. As Dr. Richard Aidoo, Professor of Political Science at Coastal Carolina University observed, “most locals have very little knowledge about the structures, frameworks, and processes governing the distribution of these resources.”¹⁰¹ This lack of transparency – worsened by resource constraints and low levels of formal education among some small-scale miners – has further marginalized local actors and constrained their ability to demand accountability from the state and large-scale mining companies.¹⁰² In this context, collaboration with Chinese miners can offer more immediate bargaining power and tangible returns. This is effectively articulated by Hannah Owusu-Koranteng (WACAM): “why wouldn’t I give out my land for tangible benefits rather than wait for the government to allocate it to a large-scale mining company?”¹⁰³

Dr. Aidoo further elaborates that there is “lack of awareness of the mechanisms of compensation (...) most people have very little knowledge about the structure and processes behind the distribution of these resource.”¹⁰⁴ This informational deficit, compounded by resource constraints, has further marginalized local actors, hindering their ability to demand accountability from the state and large-scale mining corporations in the equitable redistribution of mineral wealth.¹⁰⁵ In this light, local actors have higher bargaining power and direct participation in cooperation with Chinese miners¹⁰⁶.

Ultimately, Chinese involvement in Ghana's ASM sector is less a story of external infiltration than one of structural neglect creating conditions for collaboration. The historical prioritization of large-scale mining over ASM has created a space for Chinese actors to fill institutional voids the Ghanaian state has failed to address. For many Ghanaian miners, collaboration with Chinese operators is an economic necessity and, in some cases, resistance

¹⁰⁰ Ocquaye, N. (2025) Interview with Ocquaye, N. London School of Economics, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, 19 December 2024

¹⁰¹ Aidoo, R (2025) Interview with Aidoo, R. Coastal Carolina University, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, 29 January 2025

¹⁰² Bugri, J.T. and Kumi, S., (2018). Dynamics of community perceptions, common resources and compensation practices in mining: the case of Newmont Ghana Gold Ltd at Ahafo. *International Journal of the Commons*, 12(1). <https://thecommonsjournal.org/articles/757/files/submission/proof/757-1-7332-1-10-20180423.pdf>

¹⁰³ Owusu-Koranteng, H. (2025) Interview with Owusu-Koranteng, H., Executive Director of WACAM. Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on 8 January 2025

¹⁰⁴ Aidoo, R (2025) Interview with Aidoo, R. Coastal Carolina University, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, 29 January 2025

¹⁰⁵ Bugri, J.T. and Kumi, S., (2018). Dynamics of community perceptions, common resources and compensation practices in mining: the case of Newmont Ghana Gold Ltd at Ahafo. *International Journal of the Commons*, 12(1). <https://thecommonsjournal.org/articles/757/files/submission/proof/757-1-7332-1-10-20180423.pdf>

¹⁰⁶ Owusu-Koranteng, H. (2025) Interview with Owusu-Koranteng, H., Executive Director of WACAM. Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on 8 January 2025

against systemic inequity. As WACAM’s Owusu-Koranteng cautioned, focusing solely on galamsey miners “means we are losing sight of the fundamental issues.”¹⁰⁷ Effective policy responses must therefore move beyond enforcement-centric approaches and adopt a holistic mining governance framework that recognizes the interconnectedness of large- and small-scale mining and directly addresses the structural marginalization of the ASM sector.

¹⁰⁷ Ibid.

4.0 The Nature of Chinese Involvement in Ghana's ASM

Building on the structural drivers identified in Section 3, this section examines how the long-standing neglect of Ghana's ASM sector translates into concrete modes of Chinese entry and operation. Understanding the specific mechanisms through which Chinese actors access, finance, and control ASM activities is essential for designing policy responses that address the root causes of foreign participation.

Existing research and interviewees reflect that Chinese involvement in Ghana's ASM sector is facilitated through the illegal sale of mining concessions by Ghanaians to Chinese nationals.¹⁰⁸ The foundation of this system lies in extensive networks that connect Chinese businessmen to mining opportunities. Zhang, who provides construction services for Chinese gold miners in Ghana, emphasizes that Chinese entry relies heavily on these networks:¹⁰⁹ "First they [Chinese businessmen] need information – they may go to their hotel owners, friends, or other existing contacts in Ghana. Gold mining in Ghana is very mature and widespread, so almost everyone has one or two contacts in the industry. It is not difficult to find where gold is."¹¹⁰ He also highlights social media's growing role: "since it is such a profitable industry, everyone wants to be a part of it. Social media channels, such as Douyin (the Chinese version of TikTok) are now very developed and many of these possibilities appear online."¹¹¹



Figure 3 Chinese miner melting gold extracted from mines in Ghana in a small furnace

¹¹² These sophisticated digital and personal networks enable two main pathways into the sector. Chinese businessmen already in Ghana in other industries, such as retail, can easily transition into mining through their established connections.¹¹³ Alternatively, Chinese businessmen may enter the country specifically to inspect potential gold sites through their contacts.¹¹⁴ Those with expertise in topography and soil analysis use their knowledge to evaluate gold-

¹⁰⁸ See: Meng, 2015; Crawford et al., 2015; Aidoo, 2016; Kumah, 2023

¹⁰⁹ Zhang (2025) Interview with Zhang, Chinese Entrepreneur, Interviewed by Gioia Serena Wang, CDD-Ghana on 1 August 2025.

¹¹⁰ Ibid.

¹¹¹ Ibid.

¹¹² Screenshot from a video interview with a former Guangxi gold miner published on the YouTube channel *JohnnyN's Vlog*. Source: Xiao Zhong Johnny (小钟 Johnny) (2022). *Guangxi natives mining gold in Africa: easily earning millions, clashing with police, and outwitting bandits*. 广西老表非洲挖黄金, 轻松赚百万, 和警察火拼, 跟劫匪斗智斗勇. [online] YouTube. Available at: <https://www.youtube.com/watch?v=72ZDFRXQgb4>.

¹¹³ Ibid.

¹¹⁴ Ibid.

bearing land identified by intermediaries, who may be either Ghanaian or Chinese with local connections.¹¹⁵

Once potential mining sites are identified through these networks, Chinese businessmen establish financial and operational arrangements with local actors. They rent land from local village chiefs or landowners, typically paying 10-15% of royalties from mining operations¹¹⁶. Chinese miners also work with local intermediaries to identify Ghanaians who already have small-scale mining concessions or can legally front for the Chinese.¹¹⁷

¹¹⁵ China Development Brief (2019). *China's get-rich-quick gold miners and their gold rush dreams on the edge of legality* (暴富的中国淘金客, 和他们游离在灰色地带的淘金梦). [online] Chinadevelopmentbrief.org.cn. Available at: <https://www.chinadevelopmentbrief.org.cn/news/detail/20411.html>.

¹¹⁶ Ofusu-Peasah G. (2024): Interview with Ofusu-Peasah G. Independent Expert, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on 18 December 2025

¹¹⁷ Ibid.

Info Box 2: Consequences of Chinese Entry

Double Marginalization of Small-Scale Miners

Chinese demand for land has displaced and outcompeted local alluvial miners by intensifying competition for already scarce territory, particularly as large-scale mining companies control much of the remaining land.¹¹⁵ This reflects a *double marginalization*: small-scale miners already face limited capital and land access due to the government's historical prioritization of LSM and are now further disadvantaged by Chinese operators.

A major shift has been the monetization of land. Chinese miners reportedly pay up to \$20,000 for 10 acres—prices that far exceed what local miners can afford.¹¹⁶ A decade ago, similar parcels could often be accessed at little or no cost. As Dr. Richard Kumah notes, “it’s not every local miner that has the chance to work with the Chinese... those not benefiting directly will tell you the Chinese are pricing them out of their own lands because they can give more money to the chiefs.”¹¹⁷ This dynamic is likely to intensify as Chinese actors continue to enter into the sector and bring financial and technical resources that local miners lack.

Triple Marginalization of Women in Ghana’s ASM Sector

Women in ASM experience a triple marginalization: first from the state’s prioritization of large-scale mining; second from patriarchal structures within the sector; and third from Chinese entry, which has displaced them from income-generating activities. Representatives from *Women in Mining Ghana* highlight that, even before Chinese involvement, women were already confined to low-return tasks such as washing residual gravel, while men dominated higher-income activities like excavation and supervision.¹¹⁸ Limited property rights and decision-making power further constrain women’s participation.¹¹⁹ Mechanization introduced by Chinese operators has worsened this exclusion, replacing manual washing—traditionally performed by women—with machinery that they are rarely trained to use.¹²⁰ These dynamics highlight the need for gender-sensitive policies that create pathways for women’s meaningful participation in formalized mining activities.

As Richard Hato-Kuevor explains, this often results in situations where “Ghanaians own the mines, but the financiers are foreigners, mostly of Chinese origin.”¹¹⁸ In these arrangements, Chinese provide financing for equipment and labor and receive the majority share of gold produced. Ghanaian concession holders typically receive 15-30% of profits¹¹⁹. However, these financial arrangements vary considerably and do not always benefit Ghanaians equitably. The interview with a Ghanaian miner¹²⁰ revealed that some interactions, such as directing the Chinese to gold sites, result in no compensation: “the Chinese just show up once they see you are a miner and ask if you know a place to mine. Some locals take them there, but in the end, they do not give you anything. The Chinese say they got maybe 10 grams of gold, but it could be kilos...what they tell you, you cannot challenge.” These inequities reflect power imbalances between Ghanaians with different economic positions – landowners versus miners – and between Ghanaians generally and economically privileged Chinese migrants, leaving significant room for exploitation (see Info Box 2).

Beyond simple financial partnerships, gold

mine operations often involve complex collaborations between multiple Chinese businessmen who serve different functions alongside a local Ghanaian concession holder. Liang, a Chinese businesswoman with gold mining operations in Bibiani and Kasoa, describes how she established her first mine: "when I first set up the first gold mine, I only had one million [Cedis], but investing in a mine requires over ten million [Cedis]. So, I went to find a Ghanaian who had the license, then a Chinese partner who had the equipment, and then I brought in some money. The three of us combined to get the mine up and running. Otherwise, the Ghanaians I was in contact with didn't have the technical know-how or resources to get the mine started."¹²⁷ Her account illustrates the multifaceted nature of Chinese involvement—with different actors contributing capital, equipment, and expertise. This is further emphasized by staff from the Women in Mining association: "the Chinese are involved in mining, but in a range of supporting businesses that sustain the sector."¹²⁸

Dr. Gabriel Botchwey, drawing from fieldwork in Dunkwa-on-Offin in the Upper Denkyira East Municipality, further illustrates the layered structure: "when you go to mining sites, you see the Chinese involved in managing operations – supervising equipment, dealing with buyers, operating machines... selling food, and supplying water and fuel... So, the involvement of the Chinese is not just about the number of individuals present at the site; it's about control of operations."¹²⁹ This operational control, facilitated through networks, intermediaries, and financial arrangements, enables Chinese miners to operate extensively within Ghana's ASM sector despite legal prohibition. Ultimately, the above quotes further illustrate how the historically underdeveloped and systematically neglected governance of Ghana's ASM sector has produced the institutional and financial gaps that make such cross-national, functionally differentiated collaborations both necessary and enduring.

¹¹⁸ Hato-Kuevor, R. (2025) Interview with R., Hato-Kuevor Former Analyst at the Center for Global Impact Studies, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on January 2025

¹¹⁹ Liang, Z. (2013). *Chinese gold miners trade their lives for wealth (中国淘金客, 用命换财富)*. [online] People.com.cn. Available at: http://paper.people.com.cn/hqrw/html/2013-06/16/content_1266584.htm

¹²⁰ Isaac (2025) Interview with Isaac, Ghanaian small-scale miner, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana on 1 March 2025.

¹²¹ Kumah, R. (2025) Interview with Kumah R., Independent Expert, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on April 2025

¹²² Hilson, G., Hilson, A. and Adu-Darko, E. (2014). Chinese participation in Ghana's informal gold mining economy: Drivers, implications and clarifications. *Journal of Rural Studies*, 34, pp.292–303. doi:<https://doi.org/10.1016/j.jrurstud.2014.03.001>.

¹²³ Kumah, R. (2025) Interview with Kumah R., Independent Expert, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on April 2025

¹²⁴ Danielsen, K. and Hinton, J. (2020) 'A social relations of gender analysis of artisanal and small-scale mining in Africa's Great Lakes Region', *Canadian Journal of African Studies/Revue canadienne des études africaines*, 54(1), pp. 17-36.

¹²⁵ Women in Mining Representatives (2025) Interview with Representatives from Women in Mining. Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on April 2025.

¹²⁶ Ibid.

¹²⁷ Mrs. Liang (2025) Interview with Mrs. Liang, Chinese Miner and Entrepreneur, Interviewed by Gioia Serena Wang, CDD-Ghana on 20 April 2025.

¹²⁸ Women in Mining Representatives (2025) Interview with Representatives from Women in Mining. Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on April 2025.

¹²⁹ Botchwey, G. (2025) Interview with Botchwey, G., University of Winneba, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, on 20 December 2024



Figure 4 Chinese workers manually washing sediment in a small indoor gold-processing pit to recover gold particles .

¹³⁰ The persistence of Chinese involvement despite its illegality is partly explained by divergent understandings of what constitutes legal mining activity. Zhang identified three types of Chinese involvement in Ghana's mining sector: involvement in the large-scale sector, which is legal; involvement in the small-scale sector through a Ghanaian fronting a concession, which he considers "non-compliant"; and mining in unlicensed territory, which is

illegal. This distinction between "non-compliant" (违规 - Weí Guī) and "illegal" (违法 - Weí Fǎ) reveals a critical gap in understanding. In Chinese, "non-compliant" refers to violating the spirit or intent of rules and regulations without necessarily breaking the letter of the law.¹³¹ Zhang argues that because Chinese businessmen do not themselves hold the licenses, they violate the regulatory intent of Ghanaian mining laws – which reserve ASM concessions for locals – without directly violating the law itself. However, this interpretation contradicts Ghana's Minerals and Mining Regulations (2020)¹³², which explicitly reserves contract mining services for small-scale operations exclusively to locals, making Chinese involvement illegal regardless of who holds the license. Zhang's framing may reflect either a genuine misunderstanding of local regulations or a strategic use of gray areas to deflect responsibility.

This confusion may be compounded by Ghana's complex dual land ownership system, where customary and state claims often conflict. While customary land ownership accounts for 80% of land in Ghana, the mineral legal regime vests all mineral rights in the president.¹³³ Richard Ellimah explains the resulting tension: "you may own the land, but the law has also made it clear that the mineral belongs to the state...this principle is very, very confusing to the ordinary community person because, by rules of natural justice, I own my land. Why should whatever is in

¹³⁰ Screenshot from a video published by the YouTube channel 笑谈天下君 (Xiaotan Tianxia Jun). Source: 笑谈天下君 (Xiaotan Tianxia Jun) (2022). 加纳中国淘金工，冒着刀架脖子的风险一年狂赚几百万 (Chinese gold miners in Ghana risk having a knife at their throat to earn several million a year.). [online] YouTube. Available at: <https://www.youtube.com/watch?v=iKPJj9nY5zQ>,

¹³¹ Hualv (China Lawyer) (2025). *Difference between 'illegal' and 'non-compliant / in violation of regulations'* 违法和违规的区别是什么. [online] Hualv.com. Available at: <https://www.66law.cn/laws/408904.aspx> Translated to English from a widely read Chinese online legal consultation platform.

¹³² Ghana Chamber of Mines, *Minerals and Mining (Local Contents and Local Participation) Regulations, 2020*. L.I.2431 [online] Available at: <https://ghanachamberofmines.org/wp-content/uploads/2020/12/LI-2431-Local-Content-Participation-compressed-1.pdf>.

¹³³ Mensah, A and Xavier Tuokuu, F. (2023). Polluting our rivers in search of gold: how sustainable are reforms to stop informal miners from returning to mining sites in Ghana? *Frontiers in Environmental Science*, 11. doi:<https://doi.org/10.3389/fenvs.2023.1154091>.

the land belong to somebody else?"¹³⁴ This confusion leads many landowners to bypass formal processes: "They tell you the land is theirs and they choose whoever they want to give the land to."¹³⁵ Faced with this ambiguity, local chiefs and landowners often bypass formal licensing procedures and grant mining access through private arrangements, viewing such decisions as an exercise of customary authority despite their illegality under state law.¹³⁶ These dynamics create enabling conditions for Chinese involvement, as customary actors facilitate access that formal legal channels prohibit.

Altogether, the historical marginalization of Ghana's ASM sector, combined with the dual land tenure system, has shaped divergent perceptions of Chinese participation. For some Ghanaian miners and landholders, partnerships with Chinese actors offer greater bargaining power and material returns than engagement with large-scale mining companies, which are seen as centralized, monopolistic, and historically associated with displacement. As Nathaniel Ocquaye explains: "there are both positive and negative perceptions among Ghanaian miners toward Chinese involvement. Perceptions tend to be more positive when miners have a Chinese partner, because such partnerships help fund basic needs and sustain livelihoods – often on land from which communities had already been displaced before the Chinese arrived."¹³⁷

These perceptions reflect that Ghanaian miners' collaboration with Chinese actors is not an endorsement of illegality, but rather an adaptive response to long-standing exclusion from formal mining governance and livelihood opportunities.

¹³⁴ Ellimah, R. (2025) Interview with Ellimah R, founder and analyst at the Center for Global Impact Studies, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, 30 May 2025.

¹³⁵ Ibid.

¹³⁶ Ibid.

¹³⁷ Ocquaye, N. (2025) Interview with Ocquaye, N. London School of Economics, Interviewed by Gioia Serena Wang and Elena Weinreich, CDD-Ghana, 19 December 2024

5.0 Policy Recommendations

The findings of this study indicate that effective responses to illegal Chinese involvement in Ghana’s artisanal and small-scale mining (ASM) sector – and the intensified environmental degradation driven by mechanization – cannot rely primarily on enforcement or militarized interventions. Instead, they require the creation of meaningful support structures for Ghanaian ASM operators that directly address the sector’s long-standing historical marginalization. Central to this approach are pro-people formalization strategies that move beyond imposing rigid compliance requirements and instead strengthen miners’ capacity to comply by improving access to land, finance, technology, and institutional support. By reducing the structural constraints that drive reliance on external capital and expertise, such approaches can significantly diminish incentives for collaboration with foreign actors.

If governed through a holistic, historically sensitive, and justice-oriented regulatory framework, Ghana’s ASM sector has the potential to become a meaningful driver of equitable economic development, reflecting its substantial contribution to national gold output, employment, and livelihoods¹³⁸. Importantly, the policy lessons derived from this analysis extend beyond Ghana. They are also relevant to other West African contexts, including Benin, Burkina Faso, Sierra Leone, and Togo, where Chinese nationals play significant roles in gold, diamond, lithium, and copper mining, often under similarly structural conditions and with comparable environmental and social consequences¹³⁹. The following section outlines the key policy recommendations emerging from this study:

1. Strengthening ASM Formalization and Economic Viability

Enable Access to Finance: Establish local financing mechanisms currency lacking tailored to ASM operations by developing an inclusive and predictable ASM policy framework that reduces regulatory uncertainty for lenders. This could include government-backed credit guarantees, dedicated ASM financing windows within development banks, and risk-sharing instruments that protect commercial banks from sudden policy reversals, such as blanket bans. These measures would provide banks with greater assurance that investments in ASM are viable and legally secure, enabling miners to access capital for equipment, environmental safeguards, and operational upgrading.

Reform the Licensing Framework: The current licensing regime fails to account for miners’ financial and administrative capacity, as high upfront fees, centralized procedures, and lengthy processing times effectively exclude many operators and push them into illegality. The framework

¹³⁸ See for instance Sojkova 2022, Yankson, P.W.K. and Gough, K.V. (2019) or the African Mining Vision (2009) for a continental outlook

¹³⁹ Babatunde Omowumi. A.; Asante, Richard; Asunka, Joseph; Eisenman, Joshua; Lansana, Egua F.; Naidu, Sanusha et al. (2025): Issue Brief: Chinese mining in West Africa. Responding to the environmental and social impacts. Global China Hub. Available online at <https://www.atlanticcouncil.org/wp-content/uploads/2025/10/chinese-mining-in-west-africa.pdf>.

should be restructured to lower and spread licensing costs over time and streamline administrative requirements so that miners can realistically comply. Decentralizing licensing to 16 regional offices – supported by mobile registration units and digital application systems – would reduce travel costs, processing delays, and bureaucratic bottlenecks, making legal compliance more accessible and reducing incentives for illegality. Some experts, given the increased mechanization of the sector, also suggested to create a new licensing category of mid-tier mining to legalize and better regulate Chinese involvement in the gold sector and enhance the benefits local communities receive from these activities. This, however, we forward with severe caution given the risks of further exacerbating the historical marginalization of Ghanaian miners within the sector.

Invest in Training and Environmentally Sustainable Technology: Sustainable reform of Ghana’s ASM sector requires targeted investment in miner training and the dissemination of environmentally friendly mining technologies. Government-led training programs, implemented in partnership with universities and technical institutions, can equip miners with practical skills in safe extraction, environmental management, and basic mine operations, while supporting geological prospecting through publicly funded geologists. The state should promote the adoption of affordable, mercury-free extraction technologies as alternatives to heavy mechanization. Although Ghana’s Small-Scale Mining Incubation Program has purchased and introduced¹⁴⁰ such technologies, high costs have limited uptake. Targeted subsidies, local production, or concessional financing are therefore essential to ensure accessibility and reduce ASM’s environmental footprint. By expanding domestic access to sustainable mining practices, geological knowledge, and environmentally sustainable technologies, these measures would reduce ASM operators’ reliance on Chinese financiers and equipment, thereby diminishing their presence.

2. Rebalancing Structural Inequities in Mining Governance

Relocate Idle LSM concessions: Conduct systematic audits of large-scale mining (LSM) concessions to identify underutilized or idle areas and reallocate these portions to artisanal and small-scale mining (ASM) operators through transparent and decentralized processes. Improving ASM access to productive land would reduce land scarcity, a key driver pushing miners into riverbeds and other environmentally sensitive areas, and diminish incentives to seek external partnerships in order to compete with capital-intensive LSM operations.

Reform Mineral Wealth Distribution: Modify the wealth-distribution framework that governs LSM operations in a way that communities can benefit and so that it meaningfully contributes to national economic development. This for instance can create a more vital economy that is capable of creating more jobs and better incomes, cutting incentives for people to venture into ASM. This will also reduce grievances and motivation to give away lands for Chinese operators.

Foster Inclusive Mining Governance: Move beyond repressive approaches by systematically including small-scale miners and traditional authorities in licensing and decision-making processes. Greater stakeholder participation can strengthen policy ownership and improve compliance with mining regulations. Strengthening existing governance mechanisms to effectively include both

¹⁴⁰ Minerals Income Investment Fund (2024). *Small-Scale Incubation Mining Programme will Transform Sub-Sector - MIIF*. [online] MIIF -. Available at: <https://miif.gov.gh/small-scale-incubation-mining-programme-will-transform-sub-sector/?utm>

licensed and unlicensed miners, as well as local chiefs – while accounting for their respective local power and authority – would support more tailored and legitimate policy responses and help bridge gaps between customary land tenure systems and statutory mining governance.

Introduction of a Mid-Tier Mining License: A recurring policy recommendation has been the call for the introduction of a medium-scale mining license through which Chinese participation in Ghana’s mining sector can be legalized and formalized. This proposal also appeared in the government’s recent announcement to overhaul the mining regime. However, this must be approached with careful consideration, as it also poses the risk of further diminishing local ownership and pushing Ghanaian miners to the margins of the sector – a concern outlined in the paper as the double and triple marginalization of local operators

3. Social Inclusion, Media, and Accountability

Establish Community Monitoring Mechanisms: Create community-led monitoring systems that empower residents to map ASM activities, document environmental impacts, and track regulatory compliance. This approach should include local monitoring committees, basic training in environmental reporting, and accessible digital tools – such as mobile reporting platforms – to enable real-time documentation and information-sharing. Integrating community data into district mining offices, environmental agencies, and civil society networks would strengthen early-warning systems, enhance accountability, and enhance accountability at the local level.

Journalist Training and Protection: Subject specific training of journalists that enable more nuanced media discourses can contribute to more equitable public perceptions towards ASM, that consider for instance livelihood aspect of ASM, development potential of ASM and the regulatory factors that led to Chinese involvement. Strengthening professional protections for journalists reporting on ASM would further enable investigative and balanced coverage, reducing sensationalism and contributing to more informed public debate and policy discourse.

Strengthen Women’s Participation in ASM: Enhance women’s participation in the ASM sector by improving access to information, land, legal support, and financial resources. This could include targeted outreach and training on licensing and regulatory processes, mechanisms to improve women’s access to mining land and concessions, and legal aid to address discrimination in land and licensing arrangements. Engaging directly with women’s mining associations and cooperatives can further support these efforts by strengthening collective representation, facilitating information-sharing, and channeling tailored financial and technical assistance to women miners, thereby enhancing their capacity to operate legally and sustainably.

4. International and Regional Engagement

Engage Chinese Diplomatic Actors Through Dialogue and Cooperation: Ghana should engage Chinese actors through dialogue that combines accountability with constructive collaboration. A key channel could be the recently established Association of China-Ghana Mining (ACGM), which brings together multiple Chinese companies to enhance investment, technology and skills

transfer, legal compliance, and dispute resolution. Through ACGM, Ghana can address the critical issue of respecting indigenous rights in artisanal mining to prevent overlap with Chinese large-scale operations, while ensuring Chinese involvement remains legal and confined to the large-scale sector. Other channels include working with Chinese diplomatic missions to address Chinese involvement in ASM, while exploring cooperation on technology transfer, geo-prospecting training, and environmental remediation through regulatory institutions like the Minerals Commission and Environmental Protection Agency. Ghana can also use bilateral dialogues and multilateral platforms such as FOCAC to elevate ASM-related environmental harm as a priority governance and sustainability issue, complementing domestic regulatory efforts while addressing the transnational dimensions of ASM.

Promote Regional Collaboration: Given that Chinese involvement ASM is not limited to Ghana but also takes place in other countries across West Africa, governments should strengthen regional coordination and communication mechanisms among mining ministries and regulatory agencies. This could build on existing frameworks such as the ECOWAS Mineral Development Policy and the Africa Mining Vision, which already emphasize harmonized mining governance, inclusive development, and the formalization of ASM. Leveraging these platforms would facilitate systematic information-sharing on mining practices, regulatory approaches, and enforcement challenges; support the development of shared policy responses to illegal ASM; and enable a more coordinated regional engagement with the Chinese government on responsible mining practices, corporate accountability, and cross-border enforcement gaps.

As a final observation, and in line with the African Union’s position¹⁴¹, this paper concludes that the foundation for effectively addressing persistent shortcomings in the ASM sector – including illegal foreign involvement – lies in the active participation of small-scale miners in the planning, design, implementation, and evaluation of mining policies and practices. In this light, the announcement of the Government in early 2026 to overhaul Ghana’s existing mining legislature is a welcomed development that seems to address some of the concerns and policy recommendations raised in this paper, marking a meaningful step toward greater local ownership of the sector.¹⁴²

¹⁴¹ African Union (2017). *Africa Mining Vision*. [online] Available at: https://archive.uneca.org/sites/default/files/PublicationFiles/african_mining_vision_african_mineral_governance_framework.pdf.

¹⁴² Minerals Commission (2026) [President Mahama Endorses Local Content Reforms to Empower Businesses in the Mining Industry. - Minerals Commission](#). Takoradi.

6.0 Bibliography

African Union (2009). *Africa Mining Vision*. Available at: https://archive.uneca.org/sites/default/files/PublicationFiles/african_mining_vision_african_mineral_governance_framework.pdf

African Union (2017). *Africa Mining Vision*. Available at: https://archive.uneca.org/sites/default/files/PublicationFiles/african_mining_vision_african_mineral_governance_framework.pdf

Agbetiloye, A. (2025). Ghana looks to get \$12bn a year from small-scale gold mining. *Business Insider Africa*. Available at: <https://africa.businessinsider.com/local/markets/ghana-looks-to-get-dollar12bn-a-year-from-small-scale-gold-mining/2c5hbrf>

Ahmed, S.K., Mohammed, R.A., Nashwan, A.J., Ibrahim, R.H., Abdalla, A.Q., Ameen, B.M.M. and Khidhir, R.M. (2025). Using thematic analysis in qualitative research. *Journal of Medicine, Surgery, and Public Health*, 6, p.100198. <https://doi.org/10.1016/j.glmedi.2025.100198>

Aidoo, R. (2016). The political economy of galamsey and anti-Chinese sentiment in Ghana. *African Studies Quarterly*, 16(3–4), pp.55–72. Available at: https://asq.africa.ufl.edu/wp-content/uploads/sites/168/v16a5.Aidoo_HD.pdf

Amponsah-Tawiah, K. and Dartey-Baah, K. (2011). Occupational health and safety: Key issues and concerns in Ghana. *International Journal of Business and Social Science*, 2(14).

Antwi-Boateng, O. and Akudugu, M.A. (2020). Golden migrants: The rise and impact of illegal Chinese small-scale mining in Ghana. *Politics & Policy*, 48(1), pp.135–167. <https://doi.org/10.1111/polp.12342>

Arthur-Holmes, F. and Ofosu, G. (2024). Rethinking state-led formalisation of artisanal and small-scale mining (ASM): Towards mining licence categorisation, women empowerment and environmental sustainability. *Resources Policy*, 93, p.105058. <https://doi.org/10.1016/j.resourpol.2024.105058>

Arthur-Holmes, F., Busia, K.A., Yakovleva, N. and Vazquez-Brust, D.A. (2022). Artisanal and small-scale mining methods and the Sustainable Development Goal 6: Perceived implications for clean water supply. *Environmental Science & Policy*, 137, pp.205–215.

Aswi-Boateng, L. and Akudugu, J.A. (2020). Golden migrants: The rise and impact of illegal Chinese small-scale mining in Ghana. *Politics & Policy*, 48(1), pp.135–167. <https://doi.org/10.1111/polp.12342>

Ayee, J. et al. (2011). *Local power and politics in Ghana*.

Babatunde Omowumi, A., Asante, R., Asunka, J., Eisenman, J., Lansana, E.F., Naidu, S. et al. (2025). *Chinese mining in West Africa: Responding to the environmental and social impacts*. Global China Hub, Atlantic Council. Available at: <https://www.atlanticcouncil.org/wp-content/uploads/2025/10/chinese-mining-in-west-africa.pdf>

BI Africa Contributor (2025). Illegal gold mining: Ghana tightens visa rules for Chinese nationals. *Business Insider Africa*. Available at: <https://africa.businessinsider.com/local/lifestyle/illegal-gold-mining-ghana-tightens-visa-rules-for-chinese-nationals/212bh6s>

Boafo, J., Paalo, S.A. and Dotsey, S. (2019). Illicit Chinese small-scale mining in Ghana: Beyond institutional weakness? *Sustainability*, 11(21), p.5943. <https://doi.org/10.3390/su11215943>

Botchwey, G., Crawford, G., Loubere, N. and Lu, J., 2018. South-South labour migration and the impact of the informal China-Ghana gold rush 2008-13 (No. 2018/16). WIDER Working Paper.

Braun, V. and Clarke, V. (2006). Using thematic analysis in psychology. *Qualitative Research in Psychology*, 3(2), pp.77–101. <https://doi.org/10.1191/1478088706qp063oa>

Bugri, J.T. and Kumi, S. (2018). Dynamics of community perceptions, common resources and compensation practices in mining: The case of Newmont Ghana Gold Ltd at Ahafo. *International Journal of the Commons*, 12(1). Available at: <https://thecommonsjournal.org/articles/757/>

Buxton, A. (2013). *Responding to the challenge of artisanal and small-scale mining: How can knowledge networks help?*

CDD-Ghana (2023). *2023 Mining District Development Scorecard (MDDS) League Table*. Available at: <https://cddgh.org/wp-content/uploads/2024/08/2023-Mining-Districts-Development-Scorecard-MDDS-report- Aug-2024-web-.pdf>

CitiFM (2017). Operation Vanguard has been a success – Nana Addo. Available at: <https://citifmonline.com/?p=387038>

Crawford, G. and Botchwey, G. (2017). Conflict, collusion and corruption in small-scale gold mining: Chinese miners and the state in Ghana. *Commonwealth & Comparative Politics*. <https://doi.org/10.1080/14662043.2017.1283479>

Crawford, G. and Botchwey, G. (2018). Militarisation and criminalisation of artisanal and small-scale gold mining in Ghana. *Review of African Political Economy*, 45(156), pp.321–334.

Crawford, G., Agyeyomah, C., Botchwey, G. and Mba, A. (2015). *The impact of Chinese involvement in small-scale gold mining in Ghana*. International Growth Centre.

Danielsen, K. and Hinton, J. (2020). A social relations of gender analysis of artisanal and small-scale mining in Africa's Great Lakes Region. *Canadian Journal of African Studies*, 54(1), pp.17–36.

- Donkor, E.A. (2025). 24 arrested for illegal mining at Bui Sobinso, including 14 Chinese nationals. *MyJoyOnline*. Available at: <https://www.myjoyonline.com/24-arrested-for-illegal-mining-at-bui-sobinso-including-14-chinese-nationals/>
- Duea, S.R., Zimmerman, E.B., Vaughn, L.M., Dias, S. and Harris, J. (2022). A guide to selecting participatory research methods. *Journal of Participatory Research Methods*, 3(1). <https://doi.org/10.35844/001c.32605>
- Eshun, P.A. and Okyere, E. (2017). Assessment of challenges in policy implementation in Ghana's small-scale gold mining sector. *Ghana Mining Journal*, 17(1), p.58. <https://doi.org/10.4314/gm.v17i1.6>
- Ghana Chamber of Mines (2020). *Minerals and Mining (Local Content and Local Participation) Regulations*, L.I. 2431.
- GhanaWeb (2018). Ghana may import water from 2030 – Lands Minister.
- GhanaWeb (2025a). Galamsey: EPA bans 'Chanfan' machines.
- GhanaWeb (2025b). Chinese nationals arrested in 12-hour galamsey operation at sites linked to Akonta Mining.
- Government of Ghana (2006). *Minerals and Mining Act*, Act 703.
- Hilson, G. and Maconachie, R. (2020). For the environment: An assessment of recent military intervention in informal gold mining communities in Ghana. *Land Use Policy*, 96, p.104706. <https://doi.org/10.1016/j.landusepol.2020.104706>
- Hilson, G. and Potter, C. (2005). Structural adjustment and subsistence industry: Artisanal gold mining in Ghana. *Development and Change*, 36(1), pp.106–131.
- Hilson, G., Hilson, A. and Adu-Darko, E. (2014). Chinese participation in Ghana's informal gold mining economy. *Journal of Rural Studies*, 34, pp.292–303.
- Hilson, G., Hilson, A., Maconachie, R., McQuilken, J. and Goumandakoye, H. (2017). Artisanal and small-scale mining (ASM) in sub-Saharan Africa. *Geoforum*, 83, pp.80–90. <https://doi.org/10.1016/j.geoforum.2017.05.004>
- Hualv (China Lawyer) (2025). Difference between 'illegal' and 'non-compliant / in violation of regulations'.
- IISD (2018). *Six key factors in formalizing artisanal and small-scale mining*.
- Kanarku, N.N. (2026). Birim Central: Two illegal miners arrested in joint Blue Water Guard–Police operation. *Citi Newsroom*.
- Kumah, R. (2022). *Determinants and implications of Chinese involvement in informal ASM in Ghana*. Queen's University.

- Kumah, R. (2023). Chinese participation in Ghana's illegal small-scale gold mining. *The Extractive Industries and Society*, 16, pp.1–9.
- McQuilken, J. and Hilson, G. (2016). *Artisanal and small-scale gold mining in Ghana: Evidence to inform an action dialogue*. IIED.
- Meng, Y. (2026). Sweltering heat, golden dreams: Chinese galamsey in Ghana. *Africa China Reporting Project*.
- Mensah, A. and Tuokuu, F.X. (2023). Polluting our rivers in search of gold. *Frontiers in Environmental Science*, 11.
- Minerals Income Investment Fund (MIIF) (2024). Small-scale incubation mining programme will transform sub-sector.
- Minerals Commission (2026) [President Mahama Endorses Local Content Reforms to Empower Businesses in the Mining Industry. - Minerals Commission](#). Takoradi.
- Nti, E.K., Cobbina, S.J., Attafuah, E.A., Senanu, L.D., Amenyeku, G., Gyan, M.A., Forson, D. and Safo, A.-R. (2023) 'Water pollution control and revitalization using advanced technologies: Uncovering artificial intelligence options towards environmental health protection, sustainability and water security', *Heliyon*, 9(7), p.e18170. doi:10.1016/j.heliyon.2023.e18170
- Ocquaye, N. (2023). Explaining the persistence of illegal Chinese mining in Ghana. *LSE Research Online*.
- Ofori, G. and Sarpong, D. (2023). Defying the gloom. *Environmental Science & Policy*, 139, pp.62–70.
- Ofori-Mensah, E.A. (2021). Transformation of artisanal small-scale mining in Ghana. *Journal of African Policy Studies*, 27(1).
- Oshionebo, Evaristus (2020): Fiscal Regimes for Mineral Exploration. In: Mineral and Mining in Africa. Routledge. Available at <https://doi.org/10.4324/9781351055543>
- Phil, A. and Asamoah-Gyadu, J. (2025). The social costs and injustices of militarized ASM governance in Ghana. *Canadian Journal of African Studies*.
- Sojková, I. (2022). Framing illegal ASM in Ghanaian media. *Journal of Modern African Studies*, 60(3), pp.371–391.
- Wan, P.M.J. (2014). Environmental justices and injustices of large-scale gold mining in Ghana. *The Extractive Industries and Society*, 1(1), pp.38–47.
- Wilberforce, M. and Nunoo, F. (2024). Galamsey: Ghana's illegal gold mining industry causes environmental destruction. *BBC News*.
- World Bank (2024). *Achieving sustainable and inclusive ASM: A renewed framework*.

Yankson, P.W.K. and Gough, K.V. (2019). Gold in Ghana. *The Extractive Industries and Society*, 6(1), pp.120–128.

Chinese Sources:

China Development Brief (2019). *China's get-rich-quick gold miners and their gold rush dreams on the edge of legality (暴富的中国淘金客, 和他们游离在灰色地带的淘金梦)*. [online] Chinadevelopmentbrief.org.cn. Available at: <https://www.chinadevelopmentbrief.org.cn/news/detail/20411.html>.

Hualv (China Lawyer) (2025). *Difference between 'illegal' and 'non-compliant / in violation of regulations' 违法和违规的区别是什么*. [online] Hualv.com. Available at: <https://www.66law.cn/laws/408904.aspx> Translated to English from a widely read Chinese online legal consultation platform .

Liang, Z. (2013). *Chinese gold miners trade their lives for wealth (中国淘金客, 用命换财富)*. [online] People.com.cn. Available at: http://paper.people.com.cn/hqrw/html/2013-06/16/content_1266584.htm

Xiaotan Tianxia Jun (笑谈天下君) (2022). *Chinese gold miners in Ghana risk having a knife at their throat to earn several million a year. 加纳中国淘金工, 冒着刀架脖子的风险一年狂赚几百万* [online] YouTube. Available at: <https://www.youtube.com/watch?v=iKPJj9nY5zQ>.

Xiao Zhong Johnny (小钟 Johnny) (2022). *Guangxi natives mining gold in Africa: easily earning millions, clashing with police, and outwitting bandits. 广西老表非洲挖黄金, 轻松赚百万, 和警察火拼, 跟劫匪斗智斗勇*. [online] YouTube. Available at: <https://www.youtube.com/watch?v=72ZDFRXQgb4>.

CDD-Ghana

No. 6 Quarcoo Lane,
North Airport Residential Area, Accra.

Digital Address: GA-086-9627

P. O. Box LG 404, Legon - Accra, Ghana

Telephone: +233 30 277 6142 | 777214 | 784293/4

Mobile: +233 24 435 0266 or +233 27 774 4777

Email: info@cddgh.org