

Actor map for a just transition in Ghana's gold sector

Institutional check: 2 October 2026

Purpose: identify whose livelihoods, rights, decisions, money and evidence must be examined when designing or evaluating measures intended to reduce mining harm or mining itself.

1. How to use this map

This is not a list of people who should all sit on one committee. It separates four functions:

1. **Rights-holders and affected people:** must be represented directly and should help define acceptable outcomes.
2. **Duty-bearers and implementers:** make, finance, administer or enforce public decisions and must be accountable for results.
3. **Commercial and political actors:** control land, equipment, credit, gold or influence; they must be investigated and regulated, not allowed to substitute for affected people.
4. **Independent accountability and knowledge actors:** test claims, publish evidence and provide grievance, legal or democratic scrutiny.

For each initiative, ask who can decide, who can block, who receives money, who bears risk, whose evidence counts and who has access to remedy. Consultation does not by itself redistribute power.

2. People whose livelihoods and rights are directly affected

These are the highest-priority actors. Their outcomes should be measured directly rather than inferred from licence holders, household heads, chiefs or programme administrators.

Actor or group	Why they matter	What must be established
Current artisanal and small-scale miners	Restrictions, licences, technology and purchasing rules directly change their income and risk. "Miner" conceals very different positions.	Separate licensed and unlicensed participants; permanent and seasonal workers; underground and alluvial mining; and every work role. Record net income, timing of payment, debt, injury and exposure, decision power, legal status and realistic alternatives.
Diggers, shaft workers, carriers, crushers, washers, amalgam burners and tailings workers	Tasks carry different wages, hazards and susceptibility to mechanisation. Workers can remain informal underneath a formal licence.	Who hires and pays them; piece-rate or wage terms; control over gold; safety; insurance; bargaining power; and which tasks disappear or become more dangerous under reform.
Mine and pit operators, licence holders and site managers	They control access, work organisation and compliance but may not own the land, equipment or finance.	Beneficial ownership; actual versus nominal control; worker terms; production; permits; subcontracting; environmental conduct; political ties; and who captures profits.
Former miners and people attempting to leave	They reveal whether exit is durable and what happens after income support or a ban ends.	Reason for exit; income and debt trajectory; return to mining; migration; asset loss; new work quality; household effects; and whether exit was voluntary.
Prospective miners and young people entering work	A transition can fail even if current miners exit when new entrants face the same absence of options.	Employment expectations, education, land and credit access, recruitment networks and what would make non-mining work credible.

Actor or group	Why they matter	What must be established
Women across mining and service roles	Women are often concentrated in lower-paid processing, carrying and trading and are less likely to control licences, land, machinery or teams. “Gender-neutral” delivery through those assets can reproduce exclusion.	Individual income and control over it; assets; work and care time; exposure; access to training, finance and organisations; job loss from mechanisation; violence and harassment; and decision-making power. Do not use household heads or professional women's groups as substitutes for women workers.
Children and adolescents	They may work, experience mercury exposure, leave school or absorb household income shocks. They are rights-holders, not merely labour inputs.	Age-appropriate, safeguarded research on work, school attendance, health, care burdens and household coping. Do not recruit through employers alone or expose children to retaliation.
Migrant and mobile workers	West African mining labour and knowledge move across sites and borders. Status can affect wages, policing, licensing and access to support.	Nationality and migration status, recruitment, pay, housing, mobility, documentation, discrimination, deportation risk and eligibility for transition support.
Injured, disabled and chronically exposed workers	They may be least able to move to new work and are commonly missed when studies sample current workers at sites.	Long-term health, disability costs, compensation, care dependence, insurance and accessibility of alternatives and grievance systems.
Workers' partners, dependants and unpaid caregivers	Mining income, absence, injury and exit affect consumption, unpaid work and household bargaining. Household income does not reveal distribution.	Intra-household control of income, food and housing security, unpaid care, violence, education, debt and differentiated coping.
Smallholder farmers who also mine	Ghana evidence shows farming and mining are often combined or sequenced seasonally rather than substituted.	Whether mining finances farming; seasonal calendars; land and labour allocation; crop risk; credit; and whether support replaces or merely supplements mining.
Farm owners and customary rights-holders	They may lease or sell access and can capture compensation or conservation payments.	Nature of rights, consent, payment, future production forgone, restoration liability and distribution within families and customary institutions.
Tenant farmers, sharecroppers and farm labourers	They can lose land or work without receiving a lease payment, title, compensation or programme benefit.	Tenure security, crop and income loss, eviction, consent, eligibility for compensation or new land and ability to benefit from agricultural support.
Neighbouring and downstream residents	They can bear water, sediment, mercury, flooding, noise and food-security harms while receiving little mining income.	Water and food use, measured exposure, health, livelihood loss, voice, cumulative impacts, compensation and remedy. Sample by watershed, not only administrative boundary.
Forest-edge and protected-area communities	They may depend on forests for farming, food, medicines, fuel, water, cultural practice and income while also experiencing mining or conservation enforcement.	Customary and use rights, seasonal dependence, restrictions imposed by both mining and conservation, forest condition, alternative access, compensation and direct decision power.
Fishers, livestock keepers and forest-resource users	Mining and conservation restrictions can remove access to water, grazing, fuelwood and non-timber products.	Resource dependence, access rights, seasonal use, displacement, replacement costs and whether owners' payments restrict other users.
Local service workers and businesses	Food sellers, transport workers, mechanics, accommodation providers, sex workers and other service livelihoods can depend on mining cash.	Income dependence, safety, coercion, debt, alternative customers and effects of mine closure or relocation. Use safeguards for criminalised or stigmatised work.
Future users of land and water	Restoration failure transfers costs beyond present participants.	Long-term land capability, tailings and pit liability, monitoring duration, financial guarantees and who assumes responsibility if an operator disappears.

3. Land, production, finance and trading actors

These actors determine whether an initiative changes production practices, merely changes paperwork or redirects gold elsewhere.

Actor	Role and leverage	Questions for an initiative
Customary land custodians, stools, skins, families, chiefs, queen mothers and land priests	Grant or mediate practical land access and legitimacy; may protect community interests or reproduce elite and gender inequality.	Who is entitled to decide, who receives payments, whose consent is absent, how disputes are resolved and whether women, tenants and downstream users have independent standing.
Mineral-right holders and concession owners	Control statutory mineral access and may host, tolerate or subcontract smaller operators.	Licence validity, beneficial ownership, actual site control, agreements with operators, guest miners, political ties and liability for harm.
Large-scale mining companies	Hold extensive concessions, influence local economies and government, and may finance community programmes or displace ASM.	Concession overlap, land release, security practices, local procurement, closure and restoration, alternative-livelihood projects, tax and benefit distribution, and influence over enforcement.
Cooperatives and mining associations	Can pool equipment, finance, expertise and bargaining, but leaders may control membership, prices and profits.	Membership rules, elections, accounts, profit sharing, worker voice, gender and migrant access, grievance mechanisms and conflicts between managers and workers.
Equipment owners, rental firms and operators	Excavators, pumps, crushers, dredges and vehicles determine scale and mobility; ownership may sit outside the mine.	Asset ownership and registration, finance, rental agreements, destination tracking, environmental performance and responsibility when equipment is used unlawfully.
Equipment importers, dealers, mechanics and fuel suppliers	Provide the infrastructure that allows rapid expansion or relocation.	Import and sales records, financing, customer due diligence, repair networks, geographic movement and leverage for cleaner equipment or enforcement.
Mercury, cyanide, explosives and other chemical suppliers	Shape exposure, recovery and substitution between hazards.	Legal source, volumes, customers, storage, training, waste, buyer-financed supply and whether eliminating one input increases another unmanaged toxin.
Informal financiers and advance providers	Food, equipment and cash advances are often repaid in gold and determine where it is sold.	Effective interest, repayment terms, coercion, gold-price terms, collateral, dependency and which services must be replaced before exclusion.
Banks, rural banks, microfinance, mobile-money providers, susu groups and VSLAs	Can support diversification, compliance and savings or finance extraction and concentrate access among those with collateral.	Eligibility, collateral, timing, cost, gender and migrant access, use of funds, defaults and whether finance is tied to verified conduct and absolute limits.
Insurers and guarantee providers	Can cover injury, equipment and restoration risk and influence lending.	Who is insurable, exclusions, claim performance, environmental guarantees and whether workers rather than only assets are protected.
Local gold traders and unlicensed buyers	Provide proximity, liquidity and credit and may mix origins or avoid formal prices and taxes.	Prices, assay, credit, source areas, documentation, political protection, cross-border routes and what happens to miners if the trader is removed.
GoldBod-licensed Tier 1 and Tier 2 buyers, aggregators and self-financing aggregators	Connect miners to Ghana's formal purchasing system and may receive public trade finance.	Mine of origin, beneficial ownership, pricing and assay, speed of payment, finance terms, due diligence, false-origin risk, complaints and sanctions.
Assayers, laboratories, buying centres and weighing services	Control purity and price information; asymmetry can transfer value from miners.	Calibration, independence, method, margin, dispute procedures, access and consistency between mine, buyer and exporter assays.
Transport, security, storage and export logistics firms	Maintain chain of custody or enable substitution and smuggling.	Custody transfer, seals and weights, subcontracting, route, loss and theft, security abuses and link to customs declarations.
Domestic refiners, smelters, jewellers and fabricators	Can retain value locally but may obscure origin when materials are mixed.	Input origin, mass balance, purchasing rules, yields, waste, licence, customer disclosure and whether local value addition benefits workers and communities.
Technical consultants, geologists, lawyers and environmental service providers	Licensing often depends on costly specialist services; consultants can enable compliance or sell paperwork.	Fees, independence, competence, conflicts, accessibility to smaller operators and whether plans correspond to observed practice.

Actor	Role and leverage	Questions for an initiative
Traceability vendors, certifiers and assurance firms	Define what is recorded and what buyers accept as evidence.	Coverage as a share of estimated production, recurring cost, data ownership, false entries, audit independence, worker and community outcomes, correction versus exclusion and who pays.

4. Community and local-government actors

Actor	Public or social function	What to examine
Metropolitan, municipal and district assemblies	Local planning, services, by-laws, development spending and coordination. The statutory small-scale-mining architecture also gives district leadership a role.	Revenue and expenditure, land-use planning, representation, environmental and livelihood capacity, procurement, political influence and accountability to affected settlements.
District Chief Executives, elected assembly members and unit committees	Connect executive authority, electoral representation and community implementation.	Whose interests they represent, disclosure of conflicts, access to information, treatment of opposition areas and response to grievances.
Regional Coordinating Councils	Coordinate districts and national agencies and can detect displacement between districts.	Shared monitoring, enforcement consistency, movement of equipment and miners, watershed planning and escalation of disputes.
Minerals Commission district offices and Small-Scale Mining Committees	Registration, supervision, advice, training and local monitoring are contemplated in Ghana's mining law.	Staffing, travel and inspection capacity, actual service to prospective and unlicensed miners, processing time, political interference and environmental follow-up.
Regional and local Environmental Protection Authority offices	Environmental assessment, permitting, standards, inspection and enforcement.	Permit quality, field verification, laboratory capacity, cumulative impacts, sanctions, public access to data and independence.
Water Resources Commission and basin institutions	Allocate and regulate water use and are essential for watershed-scale monitoring.	Water-use permits, baseline and downstream sampling, shared-basin impacts, public reporting and coordination with mining and environmental regulators.
Forestry Commission and protected-area managers	Control forest reserves and restoration and detect mining displacement into protected land.	Boundary integrity, authorisations, patrol incentives, remote sensing, restoration and community dependence on forest access.
Lands Commission and Office of the Administrator of Stool Lands	Land registration, valuation and distribution of stool-land revenue intersect with mineral access and compensation.	Overlapping rights, public records, valuation, revenue distribution, gender and tenant claims and dispute resolution.
District agriculture, fisheries, livestock and cooperative officers	Determine whether non-mining livelihoods receive credible technical and market support.	Farmer selection, land, extension quality, input timing, buyers, prices, climate risk and actual income rather than training counts.
Health facilities, public-health officers and laboratories	Detect injury, mercury and other exposure and bear treatment costs.	Occupational histories, biomonitoring where justified, maternal and child exposure, confidentiality, referral, cost and long-term surveillance.
Ghana Water Company, Community Water and Sanitation Agency and local water providers	Treatment costs, intake disruption and unsafe alternative sources turn mining damage into household and public-service costs.	Raw-water quality, treatment inputs and cost, service interruptions, affected users, emergency supply and recovery costs attributable to specific watersheds and periods.
Schools, education offices and child-protection services	Observe child labour, attendance and household shocks.	Safe referral, attendance and completion, transition support and avoidance of punitive measures that worsen household insecurity.
Labour inspectors, social-welfare offices and employment services	Protect workers and administer safety nets or transition support.	Reach into informal sites, wage and safety enforcement, benefit eligibility, disability support and portability for mobile workers.
Police, specialised anti-illegal-mining bodies, armed forces and private security	Enforce restrictions and protect sites, but coercive power creates risk of selective enforcement, violence and corruption.	Legal mandate, targeting criteria, arrests and seizures by actor type, use of force, bribes, political instructions, gendered impacts, due process and independent complaints.
Customs, immigration and border officials	Affect cross-border movement of gold, workers, equipment, mercury and money.	Trade and movement records, corruption risk, nationality discrimination, information sharing and whether routes move after enforcement.

Actor	Public or social function	What to examine
Prosecutors, local courts, Legal Aid and alternative-dispute bodies	Determine whether rules and community rights are enforceable in practice.	Case selection, time and cost, legal representation, outcomes by actor power, remedies and compliance with judgments.
Traditional councils, queen mothers and other customary governance bodies	Hold authority over land, social legitimacy and dispute resolution.	Internal representation, consent rules, payment distribution, sanctions, women's and tenants' voice and conflicts of interest.
Community organisations, paralegals, environmental defenders, faith groups and local media	Surface otherwise hidden harm and help residents use information and remedy systems.	Independence, safety, funding, access to evidence, representation and retaliation.

5. National Ghanaian institutions

Core policy and regulatory actors

Institution or actor	Why it belongs in the analysis
Presidency and Cabinet	Set national priorities, coordinate ministries and security bodies and decide whether foreign-exchange, employment or environmental objectives dominate. Track instructions, targets and conflicts among objectives.
Ministry responsible for lands and natural resources	Leads mining and land policy and oversees the Minerals Commission and related agencies. Examine policy design, licence reform, protected areas, inter-agency accountability and consultation.
Minerals Commission	Ghana's primary mineral-sector policy-coordination, licensing, monitoring and inspection body. Examine the mining cadastre, viable land, inspection resources, licence beneficiaries, sanctions and post-licence support. Its stated functions and current licensing information are published on its official site and mineral-rights page .
Environmental Protection Authority	Under the Environmental Protection Act 2025, it is responsible for environmental permitting, standards, monitoring and enforcement. Examine mine-level and cumulative assessment, inspection, public data and remedy (official functions ; current law and regulations).
Ghana Gold Board (GoldBod)	Since 2025, it is the sole authority for licensing gold trading and has exclusive purchasing, assay, valuation and export functions for the covered market. Examine price, trade finance, buyer concentration, origin verification, traceability coverage, sanctions and whether environmental conduct changes—not only export volume (official licensing description).
Water Resources Commission	Regulates water-resource use and should connect mine permits to watershed monitoring and downstream rights (governing Act).
Forestry Commission	Controls forest and wildlife areas and restoration programmes; essential for detecting movement into reserves and assessing long-term recovery.
Lands Commission and Ghana Geological Survey Authority	Determine land records, geological information and the practical availability and suitability of mining areas. Examine public access, overlap and whether allocated land is economically viable.
Ghana Cocoa Board and Ministry of Food and Agriculture	Cocoa support, crop prices, extension, farm rehabilitation and access to planting material shape whether farming remains a viable option. Examine tenant eligibility, timing, land security, buyers and whether support reaches people whose farms are mined or degraded.
Ghana Water Company, Community Water and Sanitation Agency and Fisheries Commission	Translate watershed damage into drinking-water, fisheries and public-service outcomes. Their monitoring should be linked to mine origin, affected users, treatment cost and remedy rather than presented only as national water-quality warnings.
Ministries responsible for finance; environment; agriculture; employment and labour; gender, children and social protection; health; local government and chieftaincy; water and sanitation; trade; interior; defence; and justice	A just transition crosses budgets, safety nets, agriculture, labour inspection, public health, decentralisation, security and prosecution. Each ministry should have a defined outcome and budget rather than be listed as a generic “stakeholder.”
Parliament and relevant committees	Make and scrutinise law, budgets, public purchasing and agency performance. Examine hearings, constituency interests, beneficial ownership, disclosure and follow-up to audit or community evidence.

Money, accountability and evidence

Institution or actor	Why it belongs in the analysis
Ministry of Finance, Bank of Ghana and Ghana Revenue Authority/Customs	Shape foreign-exchange, tax, export, payments and trade-data incentives. Compare fiscal and monetary goals with livelihood and environmental obligations.
Financial Intelligence Centre, Economic and Organised Crime Office, Office of the Special Prosecutor and police financial units	Investigate illicit finance, corruption, beneficial ownership and cross-border proceeds. Focus on high-level organisers and financial networks, with due-process safeguards.
Office of the Registrar of Companies and beneficial-ownership systems	Identify who actually controls licence holders, buyers, equipment and contractors. Nominee ownership must be tested against finance and operational control.
Minerals Income Investment Fund, Minerals Development Fund and Office of the Administrator of Stool Lands	Receive, invest or distribute mineral-linked revenue. Examine allocation formulas, beneficiaries, community participation, spending and whether funds finance transition or restoration.
Metropolitan, municipal and district revenue authorities	Reveal whether mining-derived revenue reaches affected places and whether abrupt mining reduction creates local fiscal gaps.
Commission on Human Rights and Administrative Justice, Auditor-General, Public Accounts Committee and courts	Provide human-rights, administrative, financial and judicial scrutiny. Their accessibility, independence, remedies and implementation matter more than formal existence. CHRAJ has specifically examined human rights in mining communities .
Ghana Extractive Industries Transparency Initiative	Its multi-stakeholder group joins government, civil society, industry, GNASSM and district representation and can scrutinise revenue, licences, beneficial ownership and commodity trading. Representation still has to be tested against affected groups not seated at the table (current rules and membership).
Ghana Statistical Service, universities, CSIR institutes and independent laboratories	Supply sampling, livelihood, land, water, health and economic evidence. Require transparent methods, independent access and publication of negative findings.
National and investigative media	Can expose capture and displacement but may also reproduce the false equation of legality, arrests or export volume with success. Examine ownership, access, safety and source diversity.

6. Representative, labour, industry and civil-society bodies

An organisation's existence does not prove whom it represents. Record its membership rules, funding, leadership, internal elections, conflicts and which affected groups remain outside it.

Actor	Use and limitation
Ghana National Association of Small Scale Miners (GNASSM)	Important channel for registered operators and district associations. Its official description identifies it as the umbrella association of registered small-scale miners, so it cannot by itself represent unlicensed miners, casual workers or affected non-miners (official site).
Ghana Mineworkers' Union and Trades Union Congress Ghana	Bring worker-rights, wages, safety and collective-bargaining expertise. Determine actual coverage of informal ASM and do not assume organised large-scale-mine workers share the same conditions (GMWU ; TUC Ghana).
Women in Mining Ghana and women's mining groups	Can support gender expertise, networks and advocacy. Professional membership cannot replace direct participation by women miners, processors, traders, farmers and caregivers (WIM Ghana).
Farmer, tenant, fisher and water-user organisations	Necessary to prevent mining organisations from defining community interest. Check whether landless people, women and downstream users can join and lead.
Licensed Gold Buyers Association; jewellers' and fabricators' associations; refinery and logistics bodies	Reveal pricing, liquidity, assay, finance and implementation costs. Treat commercial claims as interested evidence and require transaction and origin verification.
Ghana Chamber of Mines and large-scale industry bodies	Important for concession, employment, procurement, closure and tax questions. They do not represent ASM workers or host communities.

Actor	Use and limitation
WACAM, A Rocha Ghana and other mining-, forest- and community-rights organisations	Bring community organising, legal-support and environmental evidence. WACAM describes work with mining-affected communities on rights, litigation and policy (official site); Fern identifies A Rocha Ghana as its partner raising the alarm about galamsey's effects on communities, forests and water (Fern account). Organisational advocacy must not replace direct selection by affected people, and differing community positions should remain visible.
Environmental, anti-corruption, public-finance, labour, child-rights and gender CSOs	Test different parts of the package and can monitor state and corporate conduct. Funding, access, security and urban-rural representation should be disclosed.
Universities, professional societies and research networks	Can design independent evaluations and technical monitoring. Require protocol publication, conflicts disclosure, community data governance and methods capable of testing distribution and displacement.

7. Regional West African actors

Actor	Relevance to a Ghana initiative
ECOWAS Commission and relevant directorates	Mining policy, free movement, customs, environment, gender, labour and security must be connected. The 2009 ECOWAS mining directive already supplies a regional policy basis, but the reviewed evidence contains no evaluation of an implemented ECOWAS just-transition package (directive).
Governments and regulators of Côte d'Ivoire, Burkina Faso, Togo and other connected states	Ghanaian restrictions or price changes may redirect miners, equipment, gold or finance. Pair mining and customs agencies with labour, environment and community institutions rather than creating a policing-only response.
Regional and border customs, immigration, police and financial-intelligence bodies	Can compare shipments, buyers, currency flows and equipment movement. Oversight is needed to prevent corruption, collective punishment and discriminatory treatment of migrants.
GIABA and regional anti-money-laundering networks	Can follow beneficial ownership, suspicious transactions and cross-border financial flows that mine-site enforcement misses.
Volta Basin Authority and other shared-water institutions	Necessary where mining pollution or sediment can cross national borders through watersheds. Monitoring should be hydrological, not only administrative.
UEMOA/WAEMU and regional monetary, tax and customs bodies	Tax and currency differences across Ghana's neighbouring markets can shape gold routes even though Ghana is not a UEMOA member.
Regional miner, trader, transport and equipment networks	Show how activity actually moves and where informal rules and credit operate. Include women and workers, not only association leaders.
Regional labour, farmer, women's, environmental and human-rights networks	Can monitor effects across borders and provide channels for mobile workers and destination communities that national consultations miss.
African Union, African Mining Vision and AfCFTA institutions	Influence continental mineral policy, trade and value-addition strategies. Test whether value-retention goals improve community outcomes or mainly expand extraction and processing.

8. International market and governance actors

Commercial chain

Actor	Questions to investigate
Foreign refiners and smelters	Which Ghanaian suppliers and intermediaries do they use; what origin, environmental and human-rights checks are applied; who pays; how are problems remediated; and when do they disengage?
Bullion banks, commodity traders, vaults and international logistics firms	How do finance, payment speed, insurance, custody and market access reward or bypass particular channels? Require beneficial ownership, counterparty and origin disclosure.
Importers and trading hubs in the UAE, Switzerland, India, the United Kingdom, European Union and other destinations	Compare Ghanaian exports with partner imports; examine country-of-origin and dispatch rules, free zones, re-export, customs, tax and anti-money-laundering enforcement. Do not infer mine relocation from trade statistics alone.

Actor	Questions to investigate
London Bullion Market Association and Good Delivery refiners	LBMA's programme makes responsible-sourcing rules and annual assurance relevant to market access. Examine audit scope, country-of-origin disclosure, incident response, corrective engagement and exclusion of ASM (Responsible Gold Guidance).
Jewellery, electronics and other downstream brands	Determine whether procurement contracts, premiums, long-term commitments and public disclosure finance improvement or merely transfer compliance costs and reputation risk upstream.
Central banks, sovereign purchasers, mints, exchange-traded funds, asset managers and institutional investors	Their purchasing and investment rules affect demand and leverage. Examine whether they require verified improvement, fund it and disclose exposure.
International commercial lenders, insurers and development-finance institutions	Finance can enable safety and restoration or mechanised expansion. Link terms to independently measured conduct, worker protections and absolute environmental limits.
Certification schemes and standards bodies, including Fairmined/Fairtrade-type systems	Examine eligibility, cost, audit independence, premium distribution, exclusion, community outcomes and what happens when a site fails. Certification status is not an environmental outcome.
International assurance, accounting and traceability firms	Test data coverage, mass balance, conflicts, audit quality, public disclosure, grievance routes and who owns sensitive worker or transaction data.

Public, multilateral and civil-society actors

Actor	Relevance and accountability question
OECD and governments adhering to its mineral due-diligence framework	The gold supplement allocates responsibilities along the supply chain. Examine whether implementation produces risk mitigation and continued responsible engagement rather than buyer withdrawal (official guidance hub).
Financial Action Task Force and national anti-money-laundering regulators	Gold's portability and opacity create laundering risks. Connect financial investigation to mine, buyer and beneficial-ownership evidence without treating all informal livelihoods as organised crime (FATF gold-risk report).
Minamata Convention Secretariat, UNEP, GEF, UNIDO and planetGOLD	Influence mercury policy, finance and technical programmes. Examine long-term adoption, maintenance, toxin substitution, downstream exposure and national-plan accountability. Article 7 requires national action planning where ASGM is more than insignificant (official NAP page).
ILO and labour-rights institutions	Bring occupational safety, informal-work transition, freedom of association, child labour and decent-work standards. Ask whether enforcement is paired with income and worker protection.
WHO and public-health partners	Support exposure and health surveillance. Avoid reducing health evaluation to mercury alone or collecting biomarkers without care and remedy.
IOM, UNODC and INTERPOL	Relevant respectively to mobile livelihoods, illicit markets and cross-border enforcement. Their involvement should not collapse migrants, informal workers and organised criminal actors into one category.
World Bank, African Development Bank, IMF and bilateral donors	Shape budgets, programmes, foreign-exchange priorities and evaluation. Require publication of design, beneficiaries, financing, safeguards, failures and long-term outcomes.
EITI International Secretariat and Board	Can require transparent reporting on licences, beneficial ownership, state participation, commodity trading and revenues. Ensure disclosures connect to livelihood and environmental accountability.
International and Ghana-linked NGOs, including Fern, IMPACT, SWISSAID, Solidaridad, Global Witness and rights organisations	Research, advocacy and programme delivery can surface harm or influence buyer policy. Distinguish independent research from advocacy, disclose funding and test whether recommendations exclude producers or displace harm.
International research teams, journals and funders	Shape what counts as evidence. Require complete methods, disaggregated outcomes, local research leadership, open instruments where safe and publication of null or harmful effects.
Transnational smuggling, corruption and organised-crime networks	These are objects of investigation, not ordinary consultation partners. Map finance, protection, beneficial ownership, coercion and links to lawful businesses while protecting witnesses and due process.

9. Representation rules for every initiative

1. **Do not let one category stand in for another.** A licence holder is not a worker; a landowner is not a tenant; a chief is not every customary user; a miner is not a downstream resident; a household head is not every household member.
2. **Recruit beyond formal lists.** Licence, cooperative, union and programme registers systematically miss unlicensed workers, women in ancillary roles, migrants, people who left mining and people who receive harm without income.
3. **Disaggregate before averaging.** At minimum use work role, ownership, sex/gender, age, migration status, disability, tenure, legal status, location and upstream/downstream position.
4. **Map actual power, not only statutory mandate.** Record who controls land, equipment, credit, police access, buyer finance, documents, political protection and information.
5. **Separate voice from veto.** Affected people need meaningful decision rights and remedy. Commercial actors should be heard about feasibility but should not veto health, labour, environmental or community-rights protections.
6. **Pay attention to absence.** Non-participation may reflect time, care work, fear, illegality, language, disability or retaliation rather than lack of interest.
7. **Protect participants.** Use confidential recruitment, informed consent, safe referral and data minimisation, particularly for unlicensed miners, children, migrants, sex workers, whistle-blowers and people alleging corruption.
8. **Disclose conflicts and funding.** Record who selected representatives, paid for participation, supplied data, commissioned the study and can suppress publication.
9. **Follow actors after the intervention.** Track exit, exclusion, relocation, return to mining and new forms of harm rather than surveying only those who remain enrolled.

10. Minimum information to collect from or about each actor

- role in land, labour, finance, production, trade, regulation or harm;
- formal authority and actual influence;
- income, costs, assets, debt and payment timing;
- ownership and beneficial ownership;
- rights, tenure and legal or migration status;
- exposure to environmental, occupational, enforcement and market risk;
- benefit or loss under each proposed measure;
- capacity to comply and who would pay;
- relationships to other actors, including credit, patronage and control;
- ability to move activity, gold, money or damage elsewhere;
- representation, conflict of interest and accountability;
- access to information, participation, grievance and remedy; and
- outcomes over time, including after support or restrictions end.

11. Practical minimum for an initiative's governance structure

A credible governance structure should contain, at minimum:

- directly selected representatives of mine workers across roles, including unlicensed and former workers;

- women workers and women affected outside mining, selected independently of licence holders and household heads;
- tenant and land-owning farmers, downstream residents and other resource users;
- district government, customary authorities and the relevant basin or watershed body;
- mining, environmental, water, land, labour, health and social-protection regulators;
- buyers and financiers, with conflicts disclosed and no control over independent oversight;
- worker, farmer and community-rights organisations;
- an independent scientific and evaluation function; and
- an independent grievance, audit and public-reporting function.

Regional and international actors should join where the intervention changes prices, sourcing rules, exports, equipment, finance or cross-border movement. Their participation should bring responsibilities—data, finance, remediation and disclosure—not merely advisory status.