

## ‘TO MOVE OR NOT TO MOVE’: REFLECTIONS ON THE RESETTLEMENT OF ARTISANAL MINERS IN THE WESTERN REGION OF GHANA

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### ABSTRACT

This article critically reflects upon the shortcomings of the ‘Prestea Action Plan’, an ambitious initiative undertaken to facilitate the resettlement of artisanal miners operating in the Western Region of Ghana. The aim of the exercise was to identify viable areas for the thousands of operators who were working illegally in the town of Prestea, an area under concession to the US-based multinational, Golden Star Resources Ltd. At the time of its launch, it was one of the few support initiatives to target artisanal miners, whose claims to land are generally not recognized by governments. It was a particularly significant exercise in Ghana because it suggested that the authorities, who traditionally have exercised a policy of non-negotiation with such groups, had finally recognized that dialogue was needed if the growing rift between the country’s indigenous artisanal miners, foreign mining companies and government bodies was to be bridged. It soon emerged, however, that despite its commendable policy objectives, the Plan was fundamentally flawed—problems which would undermine the entire exercise.

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IN SEPTEMBER 2006, THE GOVERNMENT OF GHANA ANNOUNCED THAT it was undertaking a nationwide ‘sweep’ of illegal artisanal mining communities. The operation, which was coined *Fight Against Illegal Mining*,

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was financed by the country's chief large-scale mine operators and carried out by the National Security Council under the auspices of the Ghana Chamber of Mines, the representative body of the country's large-scale mining sector. Army officers began their well-coordinated sweep on 10 October 2006 in Prestea in the Western Region of the country, where they suspended all unlicensed workings, destroyed a considerable amount of mine equipment and made numerous arrests.<sup>1</sup> They continued on to Obuasi (Ashanti Region), gradually moving eastward towards Noyem and Ntronang (Eastern Region), where they arrived, unannounced, on 6 December. Ironically, the sweep concluded only weeks before the 15 January Accra meeting of the National Steering Committee for the Extractive Industries Transparency Initiative (EITI), a UK Department for International Development (DfID)-driven exercise that supports improved governance in resource-rich developing countries and which seeks to foster support to subsistence mining communities.

Joyce Aryee, CEO of the Chamber of Mines, has argued that such military intervention is necessary, explaining that 'illegal operators ... apart from stealing gold, damage other environmentally sensitive installations, such as tailing dams, dangerous chemical containment areas and infrastructure'.<sup>2</sup> While their activities certainly cause significant environmental damage, Ghana's artisanal miners—referred to locally as *galamsey*—are by no means *stealing* gold from large-scale mining companies. Rather, in mining localities such as Prestea and Noyem, where lands have been demarcated to multinationals, *galamsey* have converged to work near-surface deposits that these companies cannot extract economically.<sup>3</sup> Artisanal operators, therefore, are not only working deposits that would otherwise not be mined but in the process, are generating revenue for the government in the form of collected gold. This makes any decision to crack down on *galamsey* activities nationwide a questionable one, particularly when such an exercise almost always results in human rights abuses.

All signs point to the sweep not being about addressing criminality and environmental problems as suggested, but rather being a strategic move engineered by President John Kufuor, whose New Patriotic Party (NPP) is working desperately to gain the confidence of the Ghanaian people; the securing of additional foreign investment for large-scale mineral exploration and mining activities is seen as an essential first step. This was

1. The consensus in NGO and government circles is that each large-scale mining company operating in Ghana contributed financially to the sweep (commonly referred to as 'swoop' at the community level) with the exception of Gold Fields Ltd.

2. See M.E. Moses and R. Nkansah, 'Ghana: We Need Land Use Management Plan – Joyce Aryee' <http://allafrica.com/stories/200508250035.html> (08 March 2007).

3. Gavin Hilson and Natalia Yakovleva, 'Strained relations: a critical analysis of the mining conflict in Prestea, Ghana', *Political Geography* 26, 1 (2007), pp. 98–119.

confirmed during a recent interview with a government lawyer in Accra, who explained that ‘we [the government] must protect the investments of mining companies from the *galamsey*’.<sup>4</sup> Joyce Aryee has voiced similar views, arguing that ‘the upsurge in illegal mining which often spawns security and environmental implications for mining personnel and property [has] in the recent past badly dented the image of Ghana as a stable investor’.<sup>5</sup> Officials from both the government and the Chamber have been condemned for condoning brutal exercises such as sweeps, their fiercest critics pointing out that artisanal mining provides a livelihood to hundreds of thousands of otherwise-unemployed men, women and youths. Both counter by arguing that if *galamsey* wish to continue mining, then they should obtain a small-scale mining license, which entitles them to mine for gold on a 25 acre plot of land for a period of 3–5 years.<sup>6</sup> Anthony Evans Amoah, Minister of the Western Region, is the latest government official to voice publicly this point, noting, weeks after the sweep, that ‘only six small-scale mining companies in the [Western] region have obtained licenses after the eviction of illegal miners from concessions belonging to companies’.<sup>7</sup>

The low percentage of *legalized* small-scale miners in Ghana, however, requires some explanation. In addition to being required to make payments from their paltry earnings in order to secure a license and discouraged by the often-lengthy waiting period for a decision on an application,<sup>8</sup> there are now very few opportunities to secure a mineral-rich plot of land. Under reform, the large-scale mining and mineral exploration sector has expanded rapidly, using large tracts of land and in the process, ‘withdraw[ing] a significant percentage of the labour force from agriculture and other income-generating activities by taking farmland away and not providing enough jobs to match the number of people laid off from agriculture’.<sup>9</sup> Many of ‘the farmers and small-scale miners who lose their land to mining companies have very few means for survival in the formal economy’, and therefore engage in illegal mining, which provides the quickest means of securing income in Ghana’s informal

4. Interview with government lawyer, Accra, 24 January 2007.

5. M.E. Moses and R. Nkansah, ‘Ghana: We Need Land Use Management Plan – Joyce Aryee’ <http://allafrica.com/stories/200508250035.html> (08 March 2007).

6. Gavin Hilson and Clive Potter, ‘Structural adjustment and subsistence industry: artisanal gold mining in Ghana’, *Development and Change* 36, 1 (2005), pp. 103–31.

7. L. Akraasi, *Ghana: Galamsey Mining Cannot Be Equated to Small-Scale Mining – Fobih*, <http://allafrica.com/stories/200507060927.html> (08 March 2007).

8. Gavin Hilson and Clive Potter, ‘Why is illegal mining so ubiquitous in rural Ghana?’ *African Development Review* 15, 2 (2003), pp. 237–70.

9. Thomas Akabzaa and Abudulai Darimani, ‘Impact of Mining Sector Investment in Ghana: A Study of the Tarkwa Mining Region’ (Draft Report for SAPRIN, Washington DC, 2001), pp. 45–6.

economy.<sup>10</sup> According to the Ghana Chamber of Mines' own statistics,<sup>11</sup> 31,237 km<sup>2</sup> or 13.1 percent of the country's land area is currently under concession to mining companies. Importantly, reconnaissance licenses account for 40 percent of this total. While farming is permitted in areas under such a license, small-scale mining is not. This has significant implications for the inhabitants of a locality such as Noyem, for example, where land containing gold deposits that are uneconomical to extract on a large scale is under concession to Newmont Gold Mining Company for the next 20 years.

During the months before the sweep, the Ghanaian government, aware that illegal mining was becoming unmanageable and under pressure from the country's mining companies to address the problem, intervened to prevent further expansion of *galamsey* camps. The most promising initiative undertaken was the 'Prestea Action Plan', a programme launched to identify alternative mining areas for, and to facilitate resettlement of, *galamsey* working in Prestea, a locality in the Western Region that is under concession to the multinational Golden Star Resources Ltd. As explained in the official press release of the Minister for Lands, Forestry and Mines, 'the Ministry has adopted a policy to accommodate and support small-scale mining within a legal framework... It is expected that this new initiative will lead to a better organization, control and monitoring of small-scale mining operations'.<sup>12</sup> Armed with monies extracted from the Mineral Development Fund<sup>13</sup> and an additional US\$35,000 from CASM,<sup>14</sup> government officers worked diligently with hired consultants to 'identify suitable areas... for illegal miners'.<sup>15</sup>

10. M. Carson, S. Cottrell, J. Dickman, E. Gummerson, T. Lee, Y. Miao, N. Teranishi, C. Tully and C. Uregian, 'Managing Mineral Resources through Public-Private Partnerships: Mitigating Conflict in Ghanaian Gold Mining' (Working Paper WWS591, Woodrow Wilson School of Public and International Affairs, Princeton University, New Jersey, 2005), p. 4.

11. Ghana Chamber of Mines, 'Ghana Chamber of Mines Factoid 2006' Ghana Chamber of Mines Homepage Available at <http://ghanachamberofmines.org/internet/index.php> (31 January 2007).

12. Dominic Fobih, 'Statement by the Honourable Professor Dominic K. Fobih (MP), Minister for Lands, Forestry and Mines' (Meet-the-Press, Ministry of Information, Accra, 2005).

13. The *Mineral Development Fund* was established by the government in 1993. It is financed by 20 per cent of mine royalties obtained from companies: 50 per cent of the Fund supports government mining departments, and the remaining 50 per cent is distributed to mining areas for development purposes.

14. Communities and Small-Scale Mining (CASM) is chaired by DfID and housed at the World Bank in Washington, DC. It was launched in March 2001 'in response to international recognition of the need for an integrated approach to address the challenges facing [artisanal and small-scale mining] communities and for improved coordination between institutions funding and executing assistance' (see <http://www.casmsite.org/about.html>).

15. The terms 'artisanal mining' and 'small-scale mining' are used interchangeably throughout this paper. Interestingly, the Minister for Lands, Forestry and Mines has gone to considerable lengths to argue that *galamsey* (artisanal) mining should not be equated with small-scale mining. The broader issue, however, is how to differentiate between a 'formal'

The Plan, hitherto one of the world's most ambitious relocation exercises involving artisanal miners, had considerable promise. Up until their recent closure, the Prestea *galamsey* camps were, as one officer at the Ghana Chamber of Mines put it during an interview, 'an eyesore'<sup>16</sup>: sprawling settlements, characterized by poor hygienic conditions and sanitation, which had caused irreparable degradation to topsoil and groundwater. The proposed prospecting exercises were therefore welcome moves, promising to help facilitate the relocation of 'wildcat' *galamsey* to areas where they would be able to obtain licenses and therefore operate as *legal* small-scale miners. But further analysis reveals that despite its commendable policy objectives, the initiative itself—specifically, the way in which it was executed—was fundamentally flawed. In addition to a series of logistical problems, the areas identified for relocation proved, for a variety of reasons, inappropriate. The exercise was destined for failure from the outset.

The purpose of this article is to provide an extended analysis of the Prestea Action Plan, with special emphasis on its shortcomings. The activities carried out under the auspices of the Plan instilled a false sense of hope within the heavily marginalized artisanal mining community of Prestea: its people were suddenly being offered support from a government which has traditionally not interacted with illegal mine operators, let alone assisted them. The decision to encourage the resettlement of the town's artisanal miners to areas where they could operate legally signified that the Ghanaian Government had realized that its policies were doing little to encourage *galamsey* to obtain small-scale mining licenses; it more importantly insinuated that the authorities had finally recognized that *engagement* was the key to resolving the mounting illegal mining problem. It soon emerged, however, that the Prestea Action Plan had been poorly conceived and that government officials were no more committed to legalizing *galamsey* than before.

and 'informal' sector of the economy, for which the Minister provides little guidance. Drawing upon case study analysis from India, Patel and Srivastava were among the first to raise the question 'is the informal sector different from the formal sector?', concluding that the two can be viewed as homogeneous (see U.R. Patel and P. Srivastava, 'Macroeconomic Policy and Output Comovement: The Formal and Informal Sectors in India', *World Development* 24, 12 (1996), pp. 1915–23). Mead and Morrison identify illegality, small size, low capital intensity and an association with poverty as the 'measures of informality' (see D. Mead, C. Morrison, 'The informal sector elephant' *World Development* 24, 1 (1996), pp. 1611–9). Apart from legal status, there is little difference, in terms of level of mechanization and organization, between a registered small-scale and *galamsey* operation in Ghana; both types of activities are associated with near-identical problems. The insistence of the Minister that '*galamsey* mining cannot be equated to small-scale mining', a point reinforced by officers at the Ghana Chamber of Mines, is therefore perplexing.

16. Interview with Chamber of Mines officer, 09 July 2005.

*Contextualizing Illegal Mining in Ghana*

The *ad hoc* nature in which the Prestea Action Plan was executed is reflective of how the Ghanaian Government has approached the *galamsey* challenge since declaring its intention to formalize small-scale mining in the mid-1980s. The passing of the ‘Small-Scale Gold Mining Law’, ‘Mercury Law’ and ‘Precious Minerals and Marketing Corporation Law’ in 1989 legalized small-scale mining. The law now requires prospective small-scale miners to secure licenses, a streamlined process which Aryee et al.<sup>17</sup> describe at length. Only Ghanaian nationals aged 18 years or older are eligible to apply for small-scale mining licenses. To help facilitate registration, the Minerals Commission, the government agency responsible for regulating small-scale mining, established seven regional district centres in areas deemed to have significant small-scale mining potential. Individuals must first submit 10 copies of a completed ‘Small-Scale Mining Application Form’, along with accompanying site plans of a mining area, to the relevant small-scale mining district centre. An inspection report is then forwarded to the Chief Executive of the district in which the activity is intended to be undertaken, and after the issuance of an environmental permit and payment of the requisite fees, the application is forwarded to Dominic Fobih, the Minister for Lands, Forestry and Mines, for approval. But securing a small-scale mining license can be both laborious and costly, which has discouraged tens of thousands of people from operating within the legal domain. Even Professor Fobih recently conceded that ‘people engage in *galamsey* for a number of reasons, some of which include. . .difficulties in going through licensing processes’.<sup>18</sup> Consequently, most of the more than 200,000 people currently employed in Ghana’s artisanal mining sector work illegally as *galamsey*.<sup>19</sup>

Shortly after legalizing small-scale mining, monies provided by the World Bank were used to establish the Small-Scale Mining Project (SSMP) to help foster support for the sector. The SSMP is comprised of the Minerals Commission and the following three additional institutional pillars: (i) Precious Minerals and Marketing Corporation (PMMC), which provides mineral purchasing services to small-scale miners; (ii) the Mines Department, put in charge of the industry’s health and safety issues; and (iii) the Geological Survey Department, commissioned to

17. Benjamin N.A. Aryee, B.K. Ntibery and E. Atorkui, ‘Trends in the small-scale mining of precious minerals in Ghana: a perspective on its environmental impact’, *Journal of Cleaner Production* 11, 2 (2003), pp. 131–40.

18. See L. Akrafi, ‘Ghana: Galamsey Mining Cannot Be Equated to Small-Scale Mining – Fobih’ <http://allafrica.com/stories/200507060927.html> (08 March 2007).

19. Gavin Hilson, C.J. Hilson and Sandra Pardie, ‘Improving awareness of mercury pollution in small-scale gold mining communities: challenges and ways forward in rural Ghana’, *Environmental Research* 103, 2 (2007), pp. 275–87.

undertake important prospecting and geochemistry-related tasks. The latter organization, however, has failed repeatedly to provide the government with detailed geological data, a necessary first step towards identifying suitable areas for prospective small-scale miners. This exercise was supposed to commence following the launch of the World Bank 'Mining Sector Development and Environment Project' in 1995, under which US\$1.66 million was allegedly given to the Geological Survey Department to develop 'a program to make better geological information available to small-scale miners through the establishment of teams of geologists trained and equipped to delineate recoverable ore bodies on mining concessions'.<sup>20</sup> Failure to do so has left the government in a state of disarray, forcing the understaffed Minerals Commission to rely heavily upon an applicant's geological knowledge, which in many cases, leads to further delays in decisions on licenses. The policies of PMMC raise additional questions about the government's commitment to formalizing small-scale mining. While the Minerals Commission is adamantly opposed to any dealings with *galamsey*, the 800 buyers employed by PMMC to purchase gold produced at small-scale workings do not abide by such a policy, forging deals with both legal and illegal operators. By offering its buyers 97 percent of the market rate in local currency for collected product, the authorities are assured of capturing most of the gold produced in Ghana on a small scale. This raises an important question: what is the incentive for the government to invest additional monies to facilitate the legalization of activities, when it is already capturing mined gold?

The importance of small-scale mining in Ghana cannot be overstated. With an estimated seven million of the country's 19 million people living in poverty,<sup>21</sup> the sector has become an important source of employment. It has proved particularly indispensable within the rural areas where large-scale mining activities now take place. In such 'mining communities', the unemployment rate for the 15–24 age cohort is 70–90 percent, compared to the national average of 30 percent.<sup>22</sup> The mechanized large-scale mines now operating in these communities have created few employment opportunities. Moreover, most have taken significant amounts of land out of the hands of subsistence farmers who have very few means for survival

20. World Bank, 'Staff Appraisal Report, Republic of Ghana, Mining Sector Development and Environmental Project' (World Bank Report No. 13881-GH, Industry and Energy Operations, West Central Africa Department, Africa Region, World Bank, Washington, DC), p. iv.

21. International Labour Organization, 'Working Out of Poverty in Ghana: The Ghana Decent Work Pilot Programme' (International Labour Organization, Geneva, 2004).

22. M. Carson, S. Cottrell, J. Dickman, E. Gummerson, T. Lee, Y. Miao, N. Teranishi, C. Tully and C. Uregian, 'Managing Mineral Resources through Public-Private Partnerships: Mitigating Conflict in Ghanaian Gold Mining' (Working Paper WWS591, Woodrow Wilson School of Public and International Affairs, Princeton University, New Jersey, 2005).

in the formal economy, and thus pursue employment in *galamsey* camps in places such as Prestea, Konongo, Noyem, Bolgatanga and Ntronang. With illegal mining camps expanding in all corners of the country, causing irreparable damages to landscapes and spreading diseases such as HIV/AIDS and tuberculosis, there is urgent need for increased industry support in the form of education and technology. While there may not be a financial incentive for the government to formalize operations, many would argue that as a unit democratically elected to serve its people, it has a moral obligation to assist *all* citizens, including impoverished groups.

The Ghanaian Government has attempted to administer support to the small-scale mining sector in the past. Since the early 1990s, officers from the Minerals Commission as well as the Environmental Protection Agency have been involved in a multitude of projects that have aimed *inter alia* to educate operators on key environmental issues, particularly mercury contamination; provide technological assistance; promote alternative subsistence income-earning activities in an attempt to discourage illegal mining; and strengthen institutional support for the sector.<sup>23</sup> Each major project has been carried out in close collaboration with the World Bank, as well as various bilateral agencies such as DfID and GTZ.<sup>24</sup> Despite pledging millions of dollars in support, however, these exercises have had minimal impact, largely because they targeted *legal* small-scale mine operators, and not the burgeoning *galamsey* population.

In this respect, the Prestea Action Plan was unique, implemented solely for the benefit of illegal operators. Its launch signified that the authorities had acknowledged that the illegal mining problem needed to be tackled more 'head on', and had finally recognized that *galamsey* groups are vulnerable and impoverished. More importantly, had it been executed appropriately, the Plan could have set an important precedent: how full engagement with illegal miners could lead to favourable outcomes for all stakeholders. Despite growing consensus worldwide that artisanal and small-scale mining is a 'poverty-driven activity',<sup>25</sup> providing income-earning potential where there are no alternative employment

23. World Bank, 'Staff Appraisal Report, Republic of Ghana, Mining Sector Development and Environmental Project' (World Bank Report No. 13881-GH, Industry and Energy Operations, West Central Africa Department, Africa Region, World Bank, Washington, DC). Gavin Hilson, C.J. Hilson and Sandra Pardie, 'Improving awareness of mercury pollution in small-scale gold mining communities: challenges and ways forward in rural Ghana', *Environmental Research* 103, 2 (2007), pp. 275–87.

24. Deutsche Gesellschaft für Technische Zusammenarbeit – the technical arm of the German Development Agency.

25. M. Barry (ed.), *Regularizing Informal Mining: A Summary of the Proceedings of the International Roundtable on Artisanal Mining* (Organized by the World Bank, May 17–19, 1995, Industry and Energy Department Occasional Paper No. 6, Washington, 1996), and B. Labonne, 'Seminar on artisanal and small-scale mining in Africa: Identifying best practices and building the sustainable livelihoods of communities', in Gavin Hilson (ed.),

opportunities, few governments and donor bodies have acted to address the underlying causes of illegal mine operators' hardship over concerns of being seen by potential foreign investors as condoning illicit activities. The objectives of the Prestea Action Plan had certainly signified that at least in principle, the Ghanaian authorities had softened their stance toward illegal mining, finally recognizing that the antagonistic and confrontational approach traditionally taken toward *galamsey* was inappropriate, and that moving forward would require some level of dialogue with affected groups.

The rationale behind the government's sudden change in attitude was unclear.<sup>26</sup> The official announcement published in the newspaper read: 'following several months of consultation, a decision was taken in February [2005] by the Ghana Government and other stakeholders to stop illegal mining nationwide after an appropriate notice period'.<sup>27</sup> Following forced closure of *galamsey* pits in the Ashanti Region, the Minister of the Western Region called for all illegal miners operating within the Prestea locality to also abandon their operations, setting a deadline of 31 May 2005.<sup>28</sup> The announcement sparked considerable reaction among local chiefs, elders and *galamsey* 'gang' leaders, prompting the government to set aside areas where operators could relocate and continue

*The Socioeconomic Impacts of Artisanal and Small-Scale Mining in Developing Countries* (A.A. Balkema, The Netherlands, 2003).

26. The reality is that no one knows the true motivation behind the relocation initiative; and the reportage is equally inaccurate. For example, the CNN news piece ('Golden Star Reports on Ghanaian Government Nationwide Action to Stop Illegal Mining' available at <http://www.ccnmatthews.com/news/releases.Controller?action=check4Cookies&actionFor=543716> (28 June 2005)) that first informed the international community about the development focused upon the experience of Golden Star Resources Ltd, which has a 90 per cent stake in Bogoso Gold Limited (BGL) and controls the Bogoso/Prestea concessions. The press release states that, 'the Company has in recent years experienced an increase in illegal mining activity on its Prestea property, where high-grade veins extend to the surface, involving several thousand illegal miners', implying that *galamsey* were raiding gold deposits on land demarcated to the company. While perhaps accurate, it is important to clarify that the deposits at Prestea necessitate the application of underground mine methods for their extraction, which is uneconomical for the company to undertake, as validated by a feasibility assessment conducted in 2003. It is therefore difficult to see how, as indicated by company officials, *galamsey* activity at Prestea has resulted in widespread 'theft of gold' and 'direct loss of taxes and royalties' for government: if anything, the extraction of gold that would have otherwise not been mined has benefited the government. Officers at Golden Star Resources insist that the relocation initiative was launched in direct response to their 'persistent appeals to government' to remove *galamsey*, but it is unlikely that the illegal artisanal mining activity that took place in the area, which is of minimal interest to the company, would drive them to such lengths.

27. 'Golden Star Reports on Ghanaian Government Nationwide Action to Stop Illegal Mining' CNN Matthews <http://www.ccnmatthews.com/news/releases.Controller?action=check4Cookies&actionFor=543716> (28 June 2005).

28. The initial deadline set was 31 March 2005 but protests by community representatives at a meeting in Sekondi in February 2005 forced the government to extend the date to 31 May 2005.

to mine. At the time, such a move seemed ideal, promising to offset the inevitable social impacts of a forced displacement from Prestea. The government, furthermore, promised that it would inform interested parties that, once organized into cooperatives and relocated, they would be issued licenses, which would provide them with the security of tenure they so desperately covet. Initially, Japa (Western Region), Adjumadium (Western Region) and Winneba (Central Region) were identified for the relocation of *galamsey* displaced from Prestea. It was claimed that 'these three areas can host nearly 600 cooperatives or groups of at least 10 members each'.<sup>29</sup> The following additional sites were also demarcated: Awudua and Ankobra in the Western Region; Jakobo in the Ashanti Region; Dokrupe and Damongo in the Northern Region; Bolgatanga in the Upper East Region; and Oquakrom in the Central Region (Figure 1).

While the Prestea Action Plan appeared, at the time, to be effective in dealing with the mounting illegal mining problem in Ghana's Western Region, several concerns were raised shortly after its launch. The discussion that follows highlights these weaknesses, drawing upon feedback from interviews conducted with key actors,<sup>30</sup> including several *galamsey* gang leaders operating in Prestea prior to the sweep. The analysis offers valuable lessons to other governments seeking to facilitate the resettlement of illegal artisanal miners.

### *Problems with the Prestea Action Plan: Voices from the Ground*

Those consulted in Ghana highlighted several problems with the Prestea Action Plan, which extend to the official announcement itself. Additional problems identified include logistical issues and concerns with the demarcated plots; but perhaps most significantly, despite its intentions, the announcement failed to engage the principal target communities (Table 1). Each of these problems is examined in turn in the discussion that follows.

**The Announcement:** The 'official' announcement of the government's intention to demarcate areas for artisanal miners was first published in the *Ghana Daily Graphic* on Tuesday 31 May 2005. Under the heading

29. 'Golden Star Reports on Ghanaian Government Nationwide Action to Stop Illegal Mining' CNN Matthews <http://www.ccnmatthews.com/news/releases.Controller?action=check4Cookies&actionFor=543716> (28 June 2005).

30. During the periods June–July 2005, August–September 2005, July–September 2006 and January 2007, separate interviews were carried out with five government officials, all of Prestea's *galamsey* leaders (five in total), three officers at mining NGOs, two officers at the Chamber of Mines, two managers at large-scale mining companies, two researchers at the University of Ghana, and two officers at BGL (Golden Star Resources Ltd.).

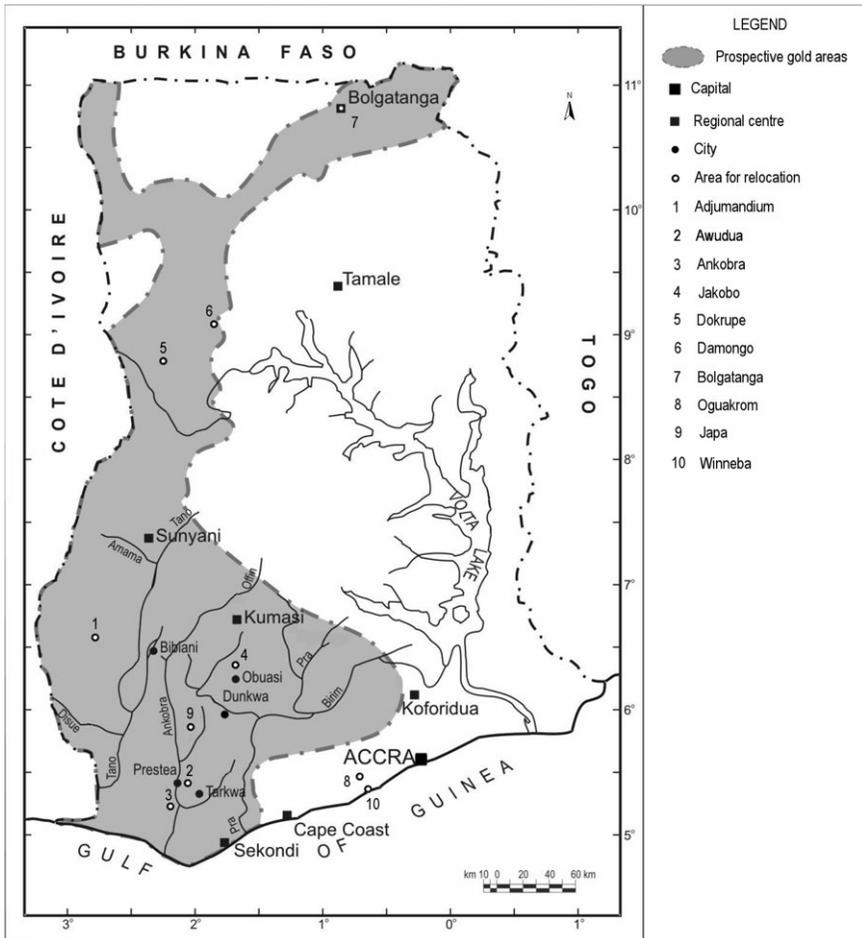


Figure 1. Principal areas sited for relocation.

‘Programme Implementation’, it was explained that the Minister was setting aside Japa (Western Region), Adjumadium (Western Region) and Winneba (Central Region) as areas for prospective miners, namely those dislocated from Prestea, ‘to form co-operatives or groups, and register at the Minerals Commission Office’.<sup>31</sup> The decision to use the newspaper as the principal outlet for this announcement, however, puts into question

31. Ministry of Lands, Forestry and Mines, ‘Press Statement on Galamsey Activities on Bogoso Concession at Prestea’, *Daily Graphic* 31 May, 2005, p. 6.

Table 1. Major *galamsey* camps in Prestea before the sweep

<i>Galamsey camp</i>	<i>Description</i>
Number Four Bungalow	The camp was based at the now-closed underground mine at Prestea. It was comprised mainly of people who were employed at the mine during its operation, and during peak periods of production, the camp employed as many as 4,000 people, on a 24-h cycle.
'I Trust My Legs'	Situated further along the gold veins was the 'I Trust My Legs' <i>galamsey</i> camp. A local sub-chief served as the gang leader of an intensive operation involving predominantly underground work; in addition to men, women and youths were at work onsite. According to the chief, the 'I Trust My Legs' label derives from the belief that in order to extract the gold, one must travel underground, often to depths exceeding 100 m. One must therefore 'trust one's legs'.
ECOMOG and Kutu Kutu	Two sprawling camps which were based some distance from Prestea Town. While the former was working underground, the latter served primarily as a washing station.

the government's commitment to the exercise overall. The consensus in government circles is that *galamsey* are not only violent and dangerous but also *illiterate*. While recent evidence<sup>32</sup> suggests that this may not be the case, it is certainly not a view embraced by the authorities, the majority of whom are adamant that illiteracy is a prevailing characteristic of artisanal mining. This, therefore, makes the decision to use a newspaper as the primary means for engaging an audience seen to be both unable and unwilling to read puzzling. Another overlooked issue was miners' access to newspapers altogether, as many camps were located significant distances from shops and magazine stands. At a number of the Prestea-based *galamsey* camps that existed before the sweep, including 'I Trust My Legs' and Number Four Bungalow, operators were observed to be reading newspapers that were weeks, and occasionally, months, old.

The government continued to endorse the move nonetheless, making reference to the immediate 'signups' which soon followed the official announcement. As one officer explained during an interview:

When the call up was made for registration, it was very overwhelming. Large numbers of people and they registered, they gave their name, even their house

32. Gavin Hilson and Clive Potter, 'Why is illegal mining so ubiquitous in rural Ghana?' *African Development Review* 15, 2 (2003), pp. 237–70.

address and everything. You see hitherto, this would never have happened but now...they have realized that the intention is to promote the industry...<sup>33</sup>

Critics, on the other hand, maintained at the time that with few exceptions, the people who had responded to the announcement were not the Prestea-based miners destined to be displaced but rather individuals in search of work in the country's big cities with accessible newspapers. As one observer noted, 'most of those people who signed up have Accra addresses, so what does that tell you?'<sup>34</sup> There is certainly some logic behind this claim: fully aware of their illegal status, *galamsey* are generally reluctant to disclose information about their names and the location of operations over fears of being prosecuted by police.

On 24 October 2005, the Minister announced that over 1000 operators were 'relocated at Japa, Adjumadium and Oguakrom from Prestea as part of the Ministry of Mines' measures to control and monitor the activities of small-scale miners'.<sup>35</sup> There was no indication, however, about *who* was moved. As explained previously, it was likely that the signup sheets contained the names of people who had been residing in Accra and Kumasi (Ghana's two largest cities) who, at the time, were seeking employment: being afforded the opportunity to secure a license to mine a plot of land for between 3 and 5 years is certainly intriguing in a country with widespread unemployment. The government had no means of verifying which people had 'relocated at Japa, Adjumadium and Orgakrom'. While officers insist that those who had moved were previously mining illegally in Prestea, during an interview with one local *galamsey* leader, it was explained that 'individuals from other places' were resettled at the aforementioned locations.<sup>36</sup>

From the outset, there appeared to be underlying expectations on the part of the authorities that informal operators would take the initiative to learn more about their prospects for relocation, but it soon emerged that the government failed to dispatch its officers to the Prestea site to notify affected parties about its intentions to demarcate areas for artisanal mining. Consequently, by the time many Prestea-based operators learned about the possibility of relocating to Japa, Winneba or Adjumadium, all of the 'signup sheets' had been filled. For unexplained reasons, the government remains convinced that the procedure was effective and appropriate.

33. Interview, Minerals Commission officer, Accra, 25 August 2005.

34. Interview, Lecturer, Department of Geology, Accra, 26 August 2005.

35. "'Galamsey' operators relocated' Ghana News Agency <http://www.ghanaweb.com/GhanaHomePage/NewsArchive/artikel.php?ID=92880> (21 March 2005).

36. Interview, *galamsey* leader of Number Four Bungalow camp, 08 June 2005.

**Overlooked community issues:** Despite Andrew's contention that '[mining] firms realize that their long-term sustainability and ability to continue to operate in certain areas depends on the health of the local environment, as well as the stability and safety of the area',<sup>37</sup> the way in which the large-scale mining sector has embraced the idea of 'community participation', and key players' insistence that 'a social license to operate'<sup>38</sup> must be secured in order to mine, are issues open to debate. On the one hand, there is evidence that in recent years, mining companies and supportive governments, in the wake of mounting public pressure, have renewed their commitment to community development.<sup>39</sup> On the other hand, it appears that many of the initiatives being undertaken in this area are conducted strictly on company and government terms: awarding crop compensation—calculated using outdated figures—to peasant farmers; reimbursing affected communities for their lands and crops but requiring individuals to travel, often hundreds of miles, to company headquarters to receive payments; and holding community meetings, now a legal requirement of many Environmental Impact Assessment (EIA) processes, but forcing affected parties to finance their own transportation to locations predetermined by a company. Despite increased calls by indigenous people for the mining sector to improve profit flows and reporting procedures,<sup>40</sup> and growing consensus that 'compensation by itself cannot adequately restore and improve the income levels and livelihood standards of people subjected to expropriation and forced displacement',<sup>41</sup> such non-participatory community development measures continue to be promoted by companies and governments. The Prestea Action Plan exhibited similar characteristics from the beginning.

In Ghana, as in most developing countries, artisanal and small-scale mining is a poverty-driven activity. In a country where there are few formal sector jobs, the industry provides a source of employment to redundant large-scale mine labourers; money for a growing number of youths working to pay their university tuition; and temporary income earning

37. J.S. Andrew, 'Potential application of mediation to land use conflicts in small-scale mining', *Journal of Cleaner Production* 11, 2 (2003), pp. 117–30.

38. A phrase conjured by multinationals to suggest that companies must gain the 'approval' of communities in order to operate.

39. H.M. Jenkins, 'Corporate social responsibility and the mining industry: conflicts and constructs', *Corporate Social Responsibility and Environmental Management* 11, 1 (2004), pp. 23–34, and T. Guerin, 'A survey of sustainable development initiatives in the Australian mining and minerals industry', *Minerals and Energy* 20, 3–4 (2006), pp. 11–44.

40. P. Kapelus, 'Mining, corporate social responsibility and the 'community': the case of Rio Tinto, Richards Bay Minerals and the Mbonambi', *Journal of Business Ethics* 39, 3 (2002), pp. 275–96.

41. T.E. Downing, 'Avoiding new poverty: mining induced displacement and resettlement' (Mining, Minerals and Sustainable Development (MMSD) Project, International Institute for Environment and Development, London, 2002).

opportunities to laid-off public-sector workers.<sup>42</sup> But authorities failed to recognize that in order to encourage Prestea-based *galamsey* to relocate, basic amenities must also be made available in the demarcated areas. As one officer employed at a local NGO explained during an interview:

... You see somebody is living here peacefully and living comfortably with their family, and then you are saying, no I won't allow you to stay here, go far away and start life again. There... should be something for the people to live [in] ... they [now] have shelter, they sleep in a much rested place [at Prestea] ... So you do think that ... [I will] go to these places? [I] have my house, my car, I live in a certain style to make me comfortable, and you ask me to go into the bush, where there's no toilet, no water, no shelter not anything. So, do you think someone will go there? So, this government issue of relocating people into this place and that, they [the *galamsey*] won't go.<sup>43</sup>

Although they suffered from several health-related ailments and caused significant land degradation, Prestea-based *galamsey* had makeshift housing and access to a regular supply of catered food, which is more than they would have had in the demarcated areas. The government did little to ensure that shelter and food, let alone sanitation and healthcare services, were made available at the demarcated sites. Furthermore, there was the unresolved issue of transportation—specifically, *how* to relocate the several hundreds of Prestea's inhabitants whom the government was targeting in the exercise. Further analysis reveals that the authorities expected subsistence groups to find their own transport and to finance their own *tro-tro*<sup>44</sup> passages, a challenge that was recognized by one *galamsey* leader at the Number Four Bungalow Camp: 'you have to be real, we have to move from here 700 km away from here? ... How?'<sup>45</sup>

Government officers also overlooked the ties several *galamsey* had with Prestea, which, they admitted, were not factored into the Prestea Action Plan because most miners were not native to the region. An officer at the Ghana Chamber of Mines reinforced this point during a personal interview, explaining that the region's 'lack of a chief' is evidence of it being a 'recent settlement', which discredits peoples' claims of having cultural ties to the area. At the same time, these officers, as well as those behind the

42. Gavin Hilson and Clive Potter, 'Why is illegal mining so ubiquitous in rural Ghana?' *African Development Review* 15, 2 (2003), pp. 237–70, and Gavin Hilson, C.J. Hilson and Sandra Pardie, 'Improving awareness of mercury pollution in small-scale gold mining communities: challenges and ways forward in rural Ghana', *Environmental Research* 103, 2 (2007), pp. 275–87.

43. Interview, Tarkwa, 27 August 2005.

44. A *tro-tro* is a crowded vehicle used for short distance travel in Ghana. The name comes from the *Ga* word, 'tro', which means 'three pence' – the penny coins used during the colonial days of the Gold Coast. Those vehicles charged a fare of three pence per trip, therefore giving rise to the name.

45. Interview, Prestea, 16 June 2005.

recent sweep, dismissed the fact that industrial-scale mining has been carried out in Prestea for more than a century, and artisanal activities for well over 300 years. According to local tradition, the name 'Prestea' is a corrupted pronunciation of the phrase 'Preston's Well': in the 1700s, an Englishman known as 'Preston' had constructed a well to aid with the excavation and processing of near-surface gold deposits ubiquitous in the area at the time. Mining, therefore, has long contributed to the social fabric of Prestea. Although *galamsey* activities have intensified in the past 10–15 years, the industry is not a recent phenomenon as government officers have suggested. The locality's gold deposits have attracted people from every corner of Ghana for centuries.

The Minister's neglect of local peoples' needs was disconcerting. Whilst most Prestea-based *galamsey* are certainly non-native to the area, many have married locals, built houses, opened shops and have put their children in local schools. Several miners condemned the government's oversight of local needs, describing at length the social ramifications of a sudden exodus:

Let us consider the people working here were leaving for Japa. It's a small village, so if we move from here many kilometres, that means we have to find transport, find homes there. In fact, it is a big problem. There is no place that the government has put aside for this in Japa or Winneba. When we get to Japa, we have nothing and leaving Prestea, and what we earn we will spend it at Japa, so we talk about the impacts to the community, then the community cannot survive at Prestea... This work we are doing, what we get from here, we want to spend the money in Prestea, and that based on that, it also boosts the morale of the community... So that means, if you are pushing us away to a different area, to start or to begin a fresh operation, we need money and the land is not much... the government, it should spend the time so that within six months, then we have the idea that we are moving to a fresh land. That means we begin to gather our things and then... But it wasn't like that. In fact, they didn't even talk to the community.<sup>46</sup>

Another leader echoed these words, arguing that 'we (the miners) ... [would be] separated from the land, and they (the government) are not concerned [because] you (the government) don't care about the people, the whole community of Prestea'.

**'No gold, no move':** The Government of Ghana has still not identified areas suitable for small-scale mining activities; nor has it managed to sufficiently improve its knowledge of the country's gold geology. In what was almost a pointless move to rectify this problem, monies were recently extracted from the Mineral Development Fund, which, along with additional funding from CASM, have since been used to 'identify suitable

46. Interview, *galamsey* leader, Number Four Bungalow, 17 June 2005.

areas ... for illegal miners'<sup>47</sup> in Ankobra and Awudua—work which was contracted, respectively, to the Geological Survey Department and the local mining consultancy, Geoman Consult Ltd. The government, however, waited until the illegal mining problem became unmanageable before even considering undertaking this essential baseline prospecting work.

In the case of the initial areas earmarked for resettlement, there was concern raised that one of the sites—Winneba—contained insufficient gold to sustain an artisanal mining community over the long-term. Commenting broadly upon the resettlement challenge, Cernea argues that 'unless ... people productive systems ... [are] reconstructed elsewhere, or replaced with steady income-generating employment, landlessness sets in and the affected families become impoverished'.<sup>48</sup> There were telling signs early on that this would be the case in Winneba, not the least of which was a low level of existing artisanal mining activity. The absence of *galamsey*, who are regarded as the superior 'pathfinders' of gold, should have been an obvious indication that gold mineralization was poor. At least one large-scale mine officer believed this to be the case:

If they [the *galamsey*] can be assured that there is gold there, then they will probably move. But why didn't they go there in the first place? If they were sure of gold being there, why didn't they go there? Let's assume that they didn't know, hadn't been told, but is there gold? I'm happy for the government in doing this. I think it's a good idea that now the government is trying to identify specific places, but I'm not sure that enough work has gone into convincing them. Why have they not moved it? Why, if the government has a place where it can be legal and no-one will harass you, have they not rushed there? So we have to ask those questions.<sup>49</sup>

On the prospect of relocating to Winneba, one *galamsey* leader declared, 'Move to Winneba? ... We're not going anyway! ... we [the *galamsey*] are not fishermen', a reference to the area's suitability for fishing, not mining.

The highly mineralized Japa posed another challenge entirely: with an estimated 300 *galamsey* camps in existence at the time, where did the government intend on relocating Prestea-based operators? Some two months after the Minister's announcement, locals confirmed that government officers had yet to visit the location.<sup>50</sup> More importantly, such a move promised to aggravate conflict. The *galamsey* consulted in both Japa and Prestea indicated that an influx of 'non-native' artisanal miners would

47. Dominic Fobih, 'Statement by the Honourable Professor Dominic K. Fobih (MP), Minister for Lands, Forestry and Mines' (Meet-the-Press, Ministry of Information, Accra, 2005).

48. M. Cernea, 'The risks and reconstruction model for resettling displaced populations', *World Development* 25 (1997), pp. 1569–87.

49. Interview, Accra, 29 August 2005.

50. Confirmed during fieldwork conducted in August 2005. As of January 2007, officers had still not visited Japa.

intensify competition for limited gold resources, netting individuals fewer profits. At least one large-scale mine officer consulted at the time appeared cognizant of this:

I think it's a good idea, but I am sceptical. As I said, I cannot see people who have moved to Damang or Tarkwa and who think they are comfortable moving to Japa. Some of them would move, but there must be much more incentive for people to move. And then whether the Japa people would be prepared to accept foreigners coming to mine there... I don't know what has been done to get that in place. I don't know. I have a feeling that people will be very protective of their territories, so if people from, let's say... Tarkwa have been asked by the government to go to... Japa, the people in... Japa who probably are *galamsey* themselves might say 'look we are not entertaining them there'. So, I think it's a good idea, but it might not be a very easy one...<sup>51</sup>

What complicated matters even further was that a local (registered) small-scale miner was attempting to organize Japa-based *galamsey* equipment owners into a cooperative to obtain a small-scale mining license and to legitimize their operations. The problem, however, was that they were targeting the same lands which the government had earmarked for relocation.

It was not that *galamsey* were unwilling to relocate. A government officer reflected upon the migratory nature of these informal operators during an interview, noting that:

So as far as the distance, the locality – it doesn't matter to the *galamsey* people, [as] all they are interested in is that the gold is there. When you go to [the] Upper East (Region) people are there from Kumasi, Tarkwa, Obuasi. They have moved to Upper East, so [a place like] Winneba is just a short distance.<sup>52</sup>

The *galamsey* would have resettled if there was an incentive to do so; but it is unrealistic to expect individuals to relocate to areas with unproven geology or where intensive artisanal mining activity is already taking place.

**Community distrust:** Community distrust also contributed to the undermining of the Prestea Action Plan. Decades of government persecution, harassment by police, and violent confrontations with the security forces of large-scale mining companies made several Prestea-based *galamsey* sceptical about the government's apparent sudden change of heart. As previously noted, throughout Ghana, few artisanal miners have been successful in securing a license to mine on a small scale. Within the majority of the country's rural communities, the government is seen as the main perpetrator of this problem, conspiring to prevent prospective operators

51. Interview, large-scale mine officer, Accra, 27 August 2005.

52. Interview, Minerals Commission officer, Accra, 25 August 2005.

from securing a license; this view is shared by several chiefs, who serve as the government's primary liaison with *galamsey* communities.

As already explained, the Ghanaian authorities have long exercised a strict, 'hands-off' policy with *galamsey* over fears of being seen by potential foreign investors as endorsing illegal mining activity. The *galamsey*, on the other hand, have interpreted this rigid stance as a sign of hostility. Moreover, there has been a catalogue of events which suggests that the government is doing anything but showing a 'human face' towards *galamsey* issues. The most significant of these took place following a meeting on 29 January 2003 between the-then Bogoso Gold Limited (BGL) mine manager, BGL security consultants and Prestea *galamsey* leaders, where it was agreed that the Number Four Bungalow *galamsey* site would be released to the 'Prestea Mining Group'<sup>53</sup> for small-scale mining activities. The details of the agreement were as follows: (i) that the site will be operated solely by the people of Prestea, Himan and Bondai; (ii) that only 100 pits and 100 people shall be allowed to operate on the site; and (iii) that ejection of operation from Four Bungalow shall be based strictly upon negotiation. These agreements, however, were not upheld by Golden Star Resources Ltd, which acquired its 90 percent share in BGL later that year; nor did the government intervene on behalf of the *galamsey* community.

Another, more recent, provocation involved the military, which, on 13 July 2005, opened fire on a parade of demonstrators protesting against BGL (i.e. Golden Star Resources Ltd). Despite the media's claim that 'some of the demonstrators ... had wanted to invade one of the mining pits, belonging to Bogoso Gold Limited',<sup>54</sup> protesters, the majority of them *galamsey*, were voicing their dissatisfaction over the mine staff's disregard for local communities.<sup>55</sup> In addition to firing teargas into crowds, military personnel shot and injured seven people. Up until the time of the sweep, Prestea gang leaders were still sending letters to BGL staff and the government, citing their willingness to broker a peace deal. All have been denied the opportunity: residents have little chance of being admitted into the BGL compound unless accompanied by a government officer or an influential local figure.

53. In an attempt to strengthen their position in policy negotiations, the *galamsey* at Number Four Bungalow came together to form the 'Prestea Mining Group' cooperative.

54. Ghana News Agency 'Police/Army open fire at Prestea' <http://www.ghanaweb.com/GhanaHomePage/NewsArchive/artikel.php?ID=83763> (22 March 2006).

55. Apart from contamination to local waterways, a main thrust of the protest was a series of blasting carried out at the mine. Currently, there are no regulations in place for noise pollution in Ghana. Residents of neighbouring towns, including Prestea and Bogoso, were complaining that the vibrations from dynamite blasts had caused cracks in houses and damaged appliances.

The government's policy towards Prestea-based *galamsey* was therefore paradoxical. On the one hand, officials maintained that the Prestea Action Plan was an example of how the authorities were now showing a 'human face' towards the illegal mining issue. The Minister for Lands, Forestry and Mines indicated that the instructions had been laid out for individuals keen on continuing their work as *legal* small-scale miners. On the other hand, throughout the exercise, there appeared to be the naïve expectation that *galamsey* would actively pursue what was being advertised as a novel opportunity. The *galamsey* had endured years of persecution and harassment from security forces, which they believed the government had condoned. A suggested change in attitude toward illegal mining, conveyed through a newspaper posting, was certainly not enough to convince miners that the authorities had begun working toward addressing their needs; in fact, it likely made them even more wary.

To summarize, it has been argued that the Prestea Action Plan had several flaws. The exercise seemed destined to fail from the outset, given the means selected by the government to inform target audiences of its launch—that is, the newspaper. This avenue not only proved ineffective but more importantly, signified that the Ghanaian authorities, who associate artisanal mining with illiteracy, had put little thought into the exercise: why would a newspaper be selected to engage groups perceived as being unable and unwilling to read? There were also several crucial questions that the government had failed to address, including *are* basic amenities going to be provided at the new sites? *will* transport be provided to the hundreds of people who would be relocated? *do* the demarcated sites contain sufficient deposits of gold? and *would* resettling people on each lead to conflict with existing populations? These problems, coupled with *galamsey* communities' general scepticism of the government, undermined the entire exercise. As an initiative to combat illegal artisanal mining activity, the Prestea Action Plan offers little in the way of guidance to other governments.

### *Concluding remarks*

Not surprisingly, the response to the Prestea Action Plan was poor. The recent sweep magnified its inadequacies: *galamsey* camps in the Western Region were overflowing at the time of military intervention because, for the reasons outlined above, the Plan had failed to do its part to discourage illegal miners from operating at Prestea. The picture painted by the government, however, was that the sweep was motivated in part by the 'defiance' of *galamsey*.

The media has also not helped illegal miners' case. A rather unfortunate reality was that the local press in particular, which, up until the time

of the sweep, provided extensive coverage of the mounting tensions between Prestea-based *galamsey* and BGL officials, had been highly selective in its reporting, failing to mention several of the key issues examined in this article. Even the writers who had sympathized with *galamsey* would often leave the reader with the impression that the people of Prestea were resisting relocation for no other reason than a desire to continue mining. For example, a comprehensive piece entitled 'Mining Cripples and Illegal Miners Resist Relocation' published in the *Ghanaian Chronicle*<sup>56</sup> failed to mention overriding community issues, giving the false impression that *galamsey* were at war with BGL over their rights as miners. On these grounds, the people of Prestea had no case; but had community issues been taken into account, their lobbying position would have strengthened considerably.

The artisanal gold mining sector has grown rapidly in Ghana in recent years, fuelled by poverty. The country's transient mining populations have destroyed vast stretches of landscape, and repeated and careless use of additives such as mercury, a lack of land reclamation, and erosion of fertile soils have made potential post-mining activities, such as farming and livestock rearing, impossible. On environmental grounds alone, therefore, the government should be motivated to devise appropriate solutions, providing incentive for *galamsey* to improve environmental management or abandon activities outright. The launch of the Prestea Action Plan signified that government officers had finally recognized that their hard-line, confrontational policy in dealing with *galamsey* was inappropriate, and that resolving the problem would require some degree of interaction with affected parties.

Since legalizing small-scale gold mining in 1989, the Ghanaian Government has implemented an array of policies and support services in an attempt to bring *galamsey* into the legal domain. The problem, however, is that these initiatives have done the exact opposite: rather than facilitating increased numbers of registered, 'legitimate', small-scale miners, it is the *galamsey* population that has burgeoned. The consensus on the ground is that these initiatives have further marginalized artisanal gold mining groups, making it exceedingly challenging to obtain a license—more specifically, that the series of policies, regulations and support services have been intentionally implemented *ad hoc* to further constrain subsistence operators.<sup>57</sup> The Prestea Action Plan appeared to

56. A. Milne, 'Mining cripples...And illegal miners resist relocation' <http://www.theminingnews.org/news.cfm?newsID=803> (25 May 2005).

57. R.K. Amankwah, C. Anim-Sackey, 'Strategies for sustainable development of the small-scale gold and diamond mining industry of Ghana', *Resources Policy* 29, 3–4 (2003), pp. 131–38, and Gavin Hilson and Clive Potter, 'Structural adjustment and

be, as one stakeholder put it, 'a breath of fresh air',<sup>58</sup> promising to restore *galamsey* confidence in the government by putting them at the centre of policy for the first time. The initiative, however, proved little different to any of the other measures implemented to regularize artisanal mining in Ghana. While the government appeared to be providing *galamsey* with an option, perhaps for the first time, it was far less attractive than advertised. The programme seemed doomed from the outset, and crucially, the government was unavailable for discussion with concerned target populations who seemed keen, at the time of interviewing, to provide officers with detailed feedback on many of the problems highlighted in this article. In fact, this has been the chief reason why widespread formalization of small-scale mining has not materialized in Ghana: that the government refuses to initiate dialogue with target *galamsey* groups. How can this sector of industry be formalized if the government is unwilling to interact with the very groups being targeted? It is recommended that before spending scarce funds on implementing untested ideas, the government works to restore trust in communities, which is a key to securing participation.

The weaknesses of the Prestea Action Plan illustrate an even bigger problem: the government's lack of knowledge of artisanal mining. The repeated application of ineffective policies and industry technologies stems largely from the authorities not knowing, *inter alia*, exactly who they are dealing with, which areas are suitable for artisanal activity, and what miners' equipment needs are. Rather than spending over US\$35,000 on selective prospecting, it would be far more productive to use funds to undertake baseline anthropological analyses of *galamsey* populations. This would help dispel some of the age-old stereotypes of artisanal miners, and more importantly, would help inform policy, leading to the design and implementation of more appropriate regulations and technologies. In the post-adjustment era, the economy and labour market of sub-Saharan Africa has changed significantly, and with it, artisanal mine community dynamics: whereas 20 years ago, the sector featured predominantly rural villagers, today, because of wider unemployment problems, several teachers, nurses, individuals who at one time were in the employ of large-scale mining companies, redundant public sector employees and mechanics have all pursued employment in artisanal gold mining communities.<sup>59</sup>

subsistence industry: artisanal gold mining in Ghana', *Development and Change* 36, 1 (2005), pp. 103–31.

58. Interview, Minerals Commission officer, Accra, 25 August 2005.

59. Gavin Hilson and Clive Potter, 'Structural adjustment and subsistence industry: artisanal gold mining in Ghana', *Development and Change* 36, 1 (2005), pp. 103–31.

An even more constructive way of using these funds as well as the monies spent on carrying out large-scale army-led 'sweeps' of *galamsey* camps, would be to research and further develop a system of transferable mineral rights. Ultimately, the Prestea situation has arisen because mining titles cannot be readily transferred in Ghana, which has major implications because large-scale mining and mineral exploration companies are being demarcated vast concessions, considerable portions of which are not being used. One employee at a local NGO illustrated this point during an interview:

I mean, no mining company in this country operates beyond 30 per cent of their concession. Some are operating at a low of 13 per cent of their concession. The mine has mine life of, let's say, 30 years ... so all this site is idle ... you can't do *galamsey* there. So I think they actually need to begin to offload portions of their concessions for the small-scale miners.<sup>60</sup>

Several stretches of these concessions could certainly support small-scale mining, an industry which again, is generally based upon deposits that are inappropriate to exploit, economically, on a large scale. This is a view shared by at least one NGO officer, who explained during an interview that,

... if a way is found that they [the companies] give maybe 10 or five square kilometres to the small-scale miners, then the government will give them the assurance that after they have finished with that area, they will not move to other parts of the concession, big companies may be willing to give out land. Because I know that the big companies are not interested in the alluvial gold and for sure in their areas, their concessions – there are some areas that are alluvial. I mean when you go to Ashanti, BGL, everywhere because, there should be some stream and there will be alluvial terrain, but they [the companies] are not interested.<sup>60</sup>

Having in place a system of readily transferable mineral rights would ensure that areas deemed unsuitable for large-scale mining could be handed over to *galamsey*, who could then secure a license that legitimizes ensuing activity. This would help the government avoid problems similar to those experienced in Prestea.

To summarize the points put forward in this article, the Prestea Action Plan, despite being advertised as unique, was little different to most of the other major initiatives undertaken to bring *galamsey* into the legal domain. The programme was potentially timely, providing the government with an opportunity to show its 'human face' toward the illegal mining problem, and importantly, repair relations with rural communities, which are currently in a deteriorated state. It was, instead, poorly conceived and

60. Interview, NGO officer, Accra, 29 August 2005.

executed, raising even more questions at the community level about how committed the government is to assisting *galamsey*. Moreover, miners' moves to express these concerns have shown that the Ghanaian authorities' hard-line stance towards illegal mining *has not* changed as suggested: government officers, and the BGL (Golden Star Resources Ltd) officials with whom they are collaborating, refuse to engage in discussion with affected parties; the situation has grown more serious in the aftermath of the sweep. As the *galamsey* have minimal inputs in such policy decisions, illegal mining will continue to expand anarchically in rural Ghana.