GHANA The Kasa Platform / Natural Resource and Enivornment Sector – JOINT UPR SUBMISSION – 2017

Joint Stateholders' Report United Nations Third Universal Periodic Review Ghana

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Submitted by the members of the Kasa Platform in the Extractive Sector.

The Kasa platform is a national Natural Resources and Environment (NRE) coalition of over 100 NRE organisations working within seven thematic areas, aimed at ensuring the effective participation of Citizens, including the marginalized, in responsible and sustainable environment and natural resource governance, maximizing its benefits to Ghana as a nation.

Members A list of all the members and organisations that assigns to this document are listed in Appendix 1

Accra, Ghana -2017

1. INTRODUCTION AND METHODOLOGY

- 1.1. The compilation of this submission has been made possible through a series of engagement with over 150 CSOs, coalitions and Networks, individual Experts and Practitioners in the natural resource and environment sector. An initial two-day capacity building workshop was organised for Coalitions and Network followed by at a two-day consultative workshop held on November 29 and 30, 2016 as a joint initiative between IUCN and KASA Initiative Ghana in collaboration with the Ghana Human Rights NGOs Forum. After the second engagement, a third meeting was organised together with other CSOs outside the natural resource and environment sector to have a broader view on human right issues.
- 1.2. The report is based on field work, media publications and articles, NGO's project data and reports from previous civil society reports submittion to other UN bodies. This report has been widely circulated among NGOs other civil society organizations for their review and inputs. The membership of the Kasa Platform and Forum includes international organisations operating in Ghana and several local human rights NGOs. Subsequent meetings for the Working Committee were held at a pre-UPR submission workshop on 21st and 22nd March, 2017 which was attended by more than 70 civil society organizations in Accra, and validated by same on 27th March, 2017. The entire membership has finalised this joint UPR submission and confirmed their commitment and approval of the report.
- 1.3. The submission is prepared in line with Information and Guidelines for the Universal Periodic Review Mechanism [as of August 2, 2016]. It covers the methodology for the preparation of the submission, background and framework, implementation of international human right obligations and measures undertaken by Ghana to entrench democracy, which have wide implications for the generality of human rights, constitutionalism, rule of law and the fight against corruption in the country. The submission subsequently highlights specific developments and follow-up measures by Ghana in relation to the summary prepared by the Office of the High Commissioner for Human Rights in accordance with paragraph 5 of the annex to Human Rights Council resolution (16/21A/HRC/WG.6/14/GHA/3).

A. Background and framework

2. Scope of international obligations

- 2.1. The principles of free, prior, and informed consultation and consent (FPIC) in the context of development projects that affect indigenous people's lives, livelihoods, and customary land rights are binding on Ghana due to their obligatory status under customary international laws. These principles are also enshrined in the following instruments, which apply to Ghana even though it has not effectively domesticated them in the Ghanaian policies, Laws and Regulations:
 - United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)
 - United Nations treaty bodies, such as the Committee on the Elimination of Racial Discrimination and Committee on Economic, Social, and Cultural Rights,
 - African Union's African Convention on the Conservation of Nature and Natural Resources
 - The Africa Mining Vision (AMV, 2009)
 - African Commission on Human and Peoples Rights (ACHPR).
 - United Nations Guiding Principles on Business and Human Rights

- 2.2. Moreover, Ghana is a state party to the Convention on Biological Diversity (CBD). While Ghana's accession to the CBD is not new to this reporting period, we highlight it in this submission because of Ghana's violation of the CBD's protections for Globally Significant Biodiversity Areas such as Atiwa, Tano Offin, and Furi Forest Reserves for mining and logging in 2015. These actions by State Party are in direct violation of commitments under the United Nation Framework Convention on Climate Change (UNFCCC) and the achievement SDG Goal 13.
- 2.3. Ghana has not signed the International Labor Organization Convention No. 169 Concerning Indigenous and Tribal Peoples in Independent Countries (Convention 169). This convention recognizes the need for the free informed consent of traditional communities.
- 2.4. In addition, there is an increasingly global expectation that businesses take responsibility for their adverse impacts on society human rights, social, environmental, ethical, and consumer concerns whether or not those impacts have been specifically addressed in national law. The UN Guiding principles on Business and Human rights are an authoritative global standard that sets out international expectation across three pillars:
 - States' duty to protect human right aganist abuse by third parties including business, through a mix of policies, regulation and adjudication,
 - Companies' responsibility to respect human righst, that is, to avoid infringing on the rights of others and address any harm to right with which they are involved, and
 - The need for access to effective Remedy where people human right are harmed
- 2.5. In most cases these three pillars are violated in the conduct of extractive companies in Ghana.

Recommendation

We recommend State Party to:

- Ratify the international Labour Organisation Convention No. 169 by September 2018.
- Establish systems to implement the Food and Agriculture Organization of the United Nations (FAO) Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forestsⁱ by the end of 2019.
- Ensure investors comply with their obligations under World Bank's social safeguardsⁱⁱ and the performance standards of the International Finance Corporation (IFC)ⁱⁱⁱ with respect to land acquisition, resettlement, and compensation.
- Finalise the large scale land acquisition guideline framework by June 2018.
- Take immediate steps to domesticate FPIC provisions as stated in the various instruments in the extractive laws of Ghana, for example covering mining, forest and oil and gas.
- Take immediate steps to domesticate the ECOWAS Directives on Mining and African Mining Visio into domestic laws on mining, and oil and gas.
- Implement the three pillars of the UN guiding principles on Business and Human right

3. Constitutional, Legislative, Human rights and Policy Framework

- 3.1. In January 2010, Ghana a 9-member Constitution Review Commission (CRC) to consult Ghanaians to seek their input into the review of the constitutioniv. With respect to the human rights implications of land and natural resource exploitation, the Government's white paper on the CRC accepted several important. Extracts from the Recommendation on Land and Natural can be found on Appendix 2
- 3.2. Despite Government acquiescence, the process with the constitution reform has not progressed.

Recommendation

We therefore call on State Party to:

- Provide steps and guidelines for the completion of the constitutional review process and implementation of ammendments by June 2018.
- Immediately outline a roadmap for a legislative framework that clearly acknowledges and administers land as a natural resource, clarifying use rights and ownership rights as has already been done for other natural resources like oil and Gas, Forest, Mineral Resources by December 2019.

B. Implementation Of International Human Rights Obligations *Equality and Non-Discrimination*

4. Gender Disparities

- 4.1. There is gender disparity in the access, ownership, and control of land and other natural resources^v. Even where women have access to land, it is often men who have the authority orcontrol and the tenure right to dispose of the land without regard to women's concerns and dialogue.
- 4.2. In addition, traditional tenants often have insecure tenure since land transactions and are not documented^{vi}. There are also disparities in the sharing of proceeds from natural resources, negatively skewed against women.
- 4.3. Displacements and forced migrations of local communities particularly female headed households and tenant farmers with less secure land tenure are expected to rise with the pace of Ghana's industrialization. In most part of the country where large scale land acquisitions happen, women in particular receive woeful and indequate compensation for loss of land, and don't have alternative lands to work on for their livelihood.
- 4.4. Compensation payments go for the male grown cash crops while food crops or communally owned tree crops which provide for women are not compensated for. This is a major threat to the achievement of SDGs:
 - Goals 4 Achieve gender equality and empower all women and girls
 - Goal 8 Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

4.5. Obligations

Ghana is obligated under the Elimination of all forms of discrimination against women [CEDAW arts. 1-5] and girls [CRC art. 2], particularly in legislation, political and public life (art. 7), economic and social life (arts. 11, 13), and family relations (art. 16)]

Recommendation

We call on State Party to:

- Review Environmental Assessment Regulations (1999), as well as other relevant regulations governing access to land and provide adequate compensation for deprivation of land and land use.
- Align them with the requirements set out in the Guiding Principles, and to strengthen the mandate of the Environmental Protection Agency to enable it to effectively monitor compliance.
- Enact NRE LI provisions that mainstream gender into benefit sharing with respect to the proceeds from natural resources.
- Review the impact of land acquisition on women as they might experience impacts of loss of access to land or settlement differently, and consult with all members of the affected community, including women. Food crops should be given the same attention as given cash crops and and economic trees.
- Ensure that community members are educated and sensitize on their right during compensation negotiation and payment. Government should also ensure that compensation rates are reviewed to reflect the current economic situation of the country or community.

5. Mechanisms For Mining Communities To Seek Redress on Compensation

5.1. The Minerals and Mining Act 2006 (Act 703) empowers the Minister to resolve conflicts on compensation payment between mining communities and mining companies. Where communites are not satsifed, the high court can only invoke a supervisory jurisdiction, rather than an orginal jurisdiction to resolve the dispute. Furthermore, the process for resolving such disputes is at the discretion of the Minister, which from practice can run for up to 10 years. This requirement prejudices communities suffering from the abusive operations of mining companies and does not provide any relief to the community while issue is being handled. This goes against pillar three (3) of the UN Guiding Principle which calls for access to effective remedy where people's human rights are harmed.

Recommendation

We call on the State government to take appropriate steps to repeal section 75 of *the Minerals and Mining Act,2006* (Act 703) which limits the right of affected persons to invoke the original jurisdiction of all compensation cases at the high court.

6. Right to Clean Water, Environment and Air

- 6.1. Illegal mining has created an environment and natural resource crisis in Ghana. Illegal mining including mechanized and artisanal mining are carried out by locals and foreign nationals from China, India and other countries. Illegal mining is carried out in forest landscapes, agricultural land and on river bodies. As a result water bodies have been silted, and heavily polluted with heavy metals such as cyanide and other toxins. Illegal mining is also associated with hazardous child labour. Efforts by the police to arrest and prosecute offenders have been ineffective.
- 6.2. The continuous abuse of the environment will derail all efforts to achieve of SDG 6^{vii} on clear water, SDG Goal 13^{viii} on climate Change, SDG Goal 14 life below water^{ix} and Goal 15 life on land^x

6.3.Obligations

- Right to safe drinking water and sanitation [ICESCR art. 11]
- Right to health [UDHR art. 25; ICESCR art. 12]

• Equal access to water and sanitation for rural women [CEDAW art. 14(2)(h)]

Recommendation

In that context and with a view to addressing the negative impacts of the activity, the Working Group encourages the Government to;

- Strengthen the law enforcement system is for now is collaborator in illegal mining.
- Introduce a responsible and well regulated medium-scale mining regime to allow for responsible and well business between nationals and foreign nationals.
- Develop the needed Act and Legalative Instrument for the implementation of the Environmental Sanitation Policy of Ghana 2010.

7. Status of Affirmative Action Bill

7.1. The Affirmative Action Bill is currently before Parliament as at December, 2016^{xi}. This bill would ensure that a 40% quota of female representation is met. In Ghana, 20% of Cabinet Ministers are women, 10.9% of members of Parliament are women, and under 5% of women participate in local governance. As of December 2016, out of 275 Members of Parliament, only 29 women out of a total of 275 Parliamentarians. On the NRE Parliamentary Committee such as Lands and Forestry Committee^{xii}, Environment, Science and Technology Committee^{xiii} and Committee on Mines and Energy^{xiv} have limited women representatives. There is no evidence to suggest any practical measures on the part of government to increase women's representation in government or public office outside the provisions of the Affirmative Action Bill.

Recommendations

The State Party should:

• Pass the Affirmative Action Bill into law and ensure that neccessry LI is also passed to ensure the implementation of the bill by june 2018

8. Excessive Use Of Force

8.1. Article 13 of Ghana's Constitution, which guarantees the right to life also provides for much wider grounds for the use of lethal force than is permissible under international standards. Article 13 (2) of the Ghanaian Constitution states:

13. (2) A person shall not be held to have deprived another person of his life in contravention of clause (1) of this article if that other person dies as the result of a lawful act of war or if that other person dies as the result of the use of force to such an extent as is reasonably justifiable in the particular circumstances-

(a) for the defence of any person from violence or for the defence of property; or (

b) in order to effect a lawful arrest or to prevent the escape of a person lawfully detained; or

(c) for the purposes of suppressing a riot, insurrection or mutiny; or (d) in order to prevent the commission of a crime by that person.

8.2. While the use of force and firearms may sometimes be permissible when making an arrest or preventing a person from escaping, the provisions of Article 13 of Ghana's Constitution are impermissibly broad and do not require the existence of an imminent or grave threat of death or serious injury and have a more lenient standard of necessity than that which is required by international standards.

- 8.3. There is no independent mechanism to investigate police abuses. At a Multi-Stakeholder Roundtable Discussion on the establishment of an independent police complaint unit in Ghana held in Accra on December 10, 2014, the Minister of Interior made a commitment to establish an independent police investigation mechanism. However, no action has been taken to deliver on this commitment^{xv}. The investigations on occasional unprofessional killings and injuries inflicted by the police during their operations often lack transparency and fairness.
- 8.4. The state security apparatus has failed to effectively ensure that security personnel handle crowds in a professional and non-violent manner, and as a result there are numerous media reports of police using excessive force against crowds. For example, it was reported that two illegal miners lost their lives during an anti-illegal mining operation in Asamama near Anyinam in the Eastern Region to halt the activities of the miners in the area.
- 8.5. The Ghana Navy has been accused of mishandling fishermen for allegedly fishing around petroleum installations. There are incidences of fishermen arrested by Naval personnel and then forced to sit on hot platforms on the navy's petrol boats. During these encounters, navy personnel have seized and sometimes burnt fishing gear, devastating the livelihoods of fisherfolk.
- 8.6. Excessive force has also been used against farmers who expanded their farms into forest reserves. The security system also continues to be abusive to those who offend the law^{xvi}
- 8.7. Police brutality in addressing conflict between a community and a mining company resulted in the death of a community protestor^{xvii}
- 8.8. These actions and inaction will draw Ghana's progress on the achievement of goal 17.^{xviii}

8.9. Obligation

- Right to life, liberty and security of the person [UDHR art. 3; ICCPR arts. 6(1), 9(1); ICPED art. 1] including freedom from torture [UDHR art. 5; ICCPR art. 7; CAT art. 2; CRC art. 37(a)]
- Protection of children from all forms of violence, abuse or exploitation [CRC arts. 19, 37(a)), including trafficking (CRC arts. 34-36; CRC–OP1)]
- Right to access to justice and due process [UDHR arts. 8, 10; ICCPR arts. 2(3), 14-15; CEDAW art. 2(c)]
- Right to legal personality [UDHR art. 6; ICCPR art. 16; CRPD art. 12]

Recommendations

The State Party should:

- Integrate respect for human rights in the operating protocols of security forces in responding to cases of illegal logging, mining or social conflicts between investors and locals^{xix}.
- Include appropriate human rights, social and environmental safeguards in proposed policies and legislation for the extractives sector while ensuring appropriate cross references with related legal and policy frameworks. These are the Mining Bill, the Petroleum (Exploration, Development and Production) Bill, the Energy Bill and their attendant policies and regulations that are currently in draft form.
- Institute very open and transparent systems with investigations of public killings involving the police or security agencies.

• Include adequate safeguards against forced evictions and improve the resettlement provisions in the Land Law (Amendment) Bill.

C. Administration and rule of law

9. Access To Effective Remedy

- 9.1. Communities' economic, social and cultural rights are difficult to enforce through the courts. Practical obstacles include the costs of pursuing a claim and the difficulty of obtaining affordable legal assistance, as well as the weak capacity of judges and local courts to adjudicate matters relating to business impacts on human rights. Lower courts at the local level, in particular, are often subject to political and business influence, which hamper the ability of victims to obtain effective remedy.
- 9.2. Recommendations from alternative dispute resolution mechanisms are usually not complied with.

Recommendation

We call on the State Party to ensure the enforcement of decisions from ADR.

10. Access to Information

- 10.1. Communities do not receive any or adequate relevant information on planned mining activities prior to the start of operations. Natural Resource Contracts such as Mining concessions and logging permits are not easily accessible or even accessible. Local communities do not have the relevant information to meaningfully participate in environmental impact assessment processes.
- 10.2. In the industrial mining sector, communities are often not consulted on decisions that will affect their land and livelihoods, like the decision to grant concessions or give access to their land. In Dormaa-Kantinka in Brong Ahafo Region, their terms of resettlement with Newmont Mining has not been honoured^{xx}.

Recommendations

The State Party should:

- i. Immediately pass the RTI Bill 2016 with the amendments by end of 2017.
- ii. Develop systems to publicly make accessible, all natural resoruce contracts, particulalry mining, logging and electormagnetic frequency contracts.
- iii. Provide access to an up to date mining cadastral of Ghana on the relevant state Ministry's website.
- iv. Provide access to O&G and other energy projects, with up to date information of the companies involved and their blocks.

11. Right to Health

11.1. Ghana has failed to address irresponsible mining by both large and small-scale operator. This poses a threat to public health and human security. Mining waste and other toxic mining chemicals continue to spill into water bodies and streams of local communities poisoning fishes and crops. Studies by Center for Environmental Impact Analysis^{xxi}, conclude that chemicals from mining activities are causing an increasing number of health problems in affected communities. These increasing health problems are not covered under the National Health Insurance Scheme (NHIS) and this limits the access to quality health care thereby burdening community members with high cost of health care.

11.2. Health and safety of logging companies, particularly mill operators also need to be addressed.

Recommendations

The State Party should:

- Domestic and internalize the Minamatta convention as well as ensure the protection of our water bodies.
- Expand the diseases cover by the NHIS to take care of mining-related diseases.
- Conduct cost benefit analysis of the extractive sector
- Expedite the pace of implementation of the FLEGT-VPA addressing issues of workers health and safety.

12. Child labour in the Extractive Industry

- 12.1. Children, who are vulnerable, are being exploited in *galamsey* (illegal small-scale mining) sector. This problem is getting worse as *galamsey* activity in Ghana is growing explosively.^{xxii}
- 12.2. The *galamsey* sector presents a broad range of human rights challenges, both for the miners themselves and for the host communities. The practice of illegal small-scale mining is changing and becoming more mechanized and destructive in Ghana, as the result of a flood of external financing. The poor regulation of illegal small-scale mining has led to widespread environmental damage, causing great harm to health and social cohesion of the local people and a loss of farmland fertility. In some cases, the indigenes are practically disenfranchised and lose control of the land in their own communities. In addition, on the rare occasion that the Government does try to enforce rules against *galamsey*, poor law enforcement training often leads to the unnecessary deaths of miners who are defending their (admittedly illegal) operations.^{xxiii}
- 12.3. In addition, the use of child labour is also rife in the cocoa production^{xxiv} and fishing industry^{xxv}. These children are sometimes slaves who have been sold to fishermen in the coastal areas. Those who use children explain that children are expected to dive into various waterbodies to disentangle fishing nets at risk to their lives.
- 12.4. The sector exposes children to economic activities at tender ages which results in teenage pregnancy and early marriages, which also disenfranchise girl education.

Recommendations

The State Party should:

- i. Expedite action on the review of the Minerals and mining act to ensure community rights are appreciated and heard during extractive sector concession acquisition and project contracting by december 2018.
- ii. Provide needed resources and capacity for the Law enforcement agencies to properly manage issues from the extractive sector, including illegal mining activities.
- iii. Fully implement the Ghana Child Labour Monitoring System.
- iv. Develop programmes to promote remediation and ensure adequate resources for the Anti-Human Trafficking Unit for the pursuit of prosecutions.
- v. Continue its combat against the use of child labour, especially in the mining industry and cocoa production, including implementation of measures on their rehabilitation, reintegration and education.

ⁱⁱ World Bank, Operational Policy 4.12 - Involuntary Resettlement, available from

ⁱⁱⁱ See World Bank, Operational Policy 4.12 - Involuntary Resettlement, available from

vi https://www.tighana.org/assets/Uploads/Land-Laws-and-Policies.pdf

viii Take urgent action to combat climate change and its impacts

ix Conserve and sustainably use the oceans, seas and marine resources for sustainable development

* Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and

reverse land degradation and halt biodiversity loss

xi http://www.peacefmonline.com/pages/local/social/201603/273381.php

xii 1 woman out of 18 members

xiii 3 women out of 18 members

xiv 2 women out of 18 members

^{xv} Report on Multi-Stakeholder Roundtable Discussion on Establishment of Independent Police Complaint Unit in Ghana, January 2015 ^{xvi} https://yen.com.gh/88127-video-two-thieves-slap-caught.html

xvii http://www.myjoyonline.com/news/2017/March-16th/protest-against-salt-mining-company-at-adina-leads-to-one-death.php

xviii Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels

xix See the Voluntary Principles on Security and Human Rights, available from http://www.voluntaryprinciples.org/.

xx http://www.ghananewsagency.org/social/dormaa-kantinka-residents-want-newmont-to-fulfill-re-settlement-agreement-91471

^{xxi} CEIA (2011) Human Health Risk Assessment and Epidemiological studies from exposure to toxic chemicals from Mining operations in Tarkwa-Nsuaem Municipality and Prestea Huni-Valley Districts.

xxii http://www.pdaghana.com/index.php/component/jdownloads/send/4-working-papers/3-child-rights-in-the-informal-mining-sector-persistent-issues-in-ghana.html

persistent-issues-in-ghana.html xxiii https://www.ghanabusinessnews.com/2014/01/04/illegal-mining-how-ghanas-forgotten-scourge-a-nation-for-gold/

xxiv https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1497785/

xxv http://internationalneedsgh.org/gh/?page_id=2316

Appendix 1

Organisation	Location
NRE Networks And Coalitions	No. of Network Members
1. Forest Watch Ghana	40
2. Working Group On Mining Members	27
3. Working Group On Environment And Climate Change	36
4. CSO Coalition On Land	34
5. CSO Coalition On Oil And Gas	96
6. Fisheries Alliance	23
7. Media Alliance on Sustainable Environment (MASE)	17
8. Civil Society Coalition On Water And Sanitation	56

ⁱ FAO, Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests (2012), available from http://www.fao.org/docrep/016/i2801e.jdf.

 $http://web.worldbank.org/WBSITE/EXTERNAL/PROJECTS/EXTPOLICIES/EXTOPMANUAL/0, contentMDK: 20064610 - menuPK: 4564 \\ 185 - pagePK: 64709096 - piPK: 64709108 - the SitePK: 502184, 00. html.$

 $http://web.worldbank.org/WBSITE/EXTERNAL/PROJECTS/EXTPOLICIES/EXTOPMANUAL/0,, contentMDK: 20064610 \\ -menuPK: 4564 \\ 185 \\ -pagePK: 64709096 \\ -piPK: 64709108 \\ -theSitePK: 502184, 00. html.$

a. ^{iv} ^{cascertain} from the people of Ghana, their views on the operation of the 1992 Fourth Republican and, in particular, the strengths and weaknesses of the Constitution;

b. articulate the concerns of the people of Ghana on amendments that may be required for a comprehensive review of the 1992 Constitution; and

c. make recommendations to the Government for consideration and provide a draft Bill for possible amendments to the 1992 Constitution."

^v http://www.fao.org/docrep/007/ae501e/ae501e04.htm

vii Ensure availability and sustainable management of water and sanitation for all

0 Demostic Lumbe Traders Association (DOLTA)	2000
9. Domestic Lumba Traders Association (DOLTA)	3000
10. Farmers Org Network In Ghana	
11. Religious Body Network (RELBONET)	37
12. Publish What You Pay (PWYP)	
13. National Union Of Environmental NGOs	128
14. Asman-Artisanal Mining Network	
15. Network Of Women In Growth	Volta
Regional Network	
16. Northern Region Development Network	Tamale
17. Brong Ahafo Development Network	Sunyani
18. Western Region Development Network	Western
Individual Cso And Ngos	
19. Center For Environmental Impact Assessment	Cape Coast
20. Center for Environmental Impact Studies	Obusi
21. Conservation Foundation	Tarkoradi
22. Wacam	Tarkwa
23. Amnesty International	Accra
24. FASWAK	Eastern Region
25. Conservation Foundation	Agona Nkwanta
26. Abibiman Foundation	Accra
27. IUCN - Ghana Office	Accra
28. Development House	
29. Social Support Foundation	Obuasi
30. Grass To Grace	Accra
31. Civic Response	Accra
32. Dals Consult	Tema
33. Community Youth Development Foundation	Kintampo
34. Strategic Youth Network For Development	Accra
35. Civic Response	Accra
36. Mind Freedom Ghana	Osu
37. Community Youth Development Association	Accra
38. ARDO	Но
39. Cafaf - Ghana	Accra
40. Ucsond	Axim

Appendix 2

Land and Natural Resource recommendations from the Constitutional Review Committee Report includes;

- Vesting all of Ghana's natural resources in the people of Ghana to be held in trust for them by the President,
- Review of the various Acts of Parliament dealing with sharing benefits derived from lands and natural resources to ensure greater transparency and accountability in the use of the resources
- A new legistlative framework on environmental crime
- A review of the tax regime on natural resources to achieve better financial returns to the State,
- A periodic review of the stabilization clauses in Natural Resource Agreements.