

# **A HUMAN RIGHTS LENS ON THE IMPACTS OF INDUSTRIAL ILLEGAL FISHING AND OVERFISHING**

## **on the socio-economic rights of small-scale fishing communities in Ghana**

| Summary |



# Introduction

Fishing communities in Ghana are struggling to sustain their livelihood and avoid extreme poverty. Fisheries resources have declined severely over the past two decades, creating competition over access and resulting in conflicts at various levels. Despite national, regional, and international policies which focus on giving small-scale fishers and fish workers access to marine resources and markets, Ghana's fishing communities and their human rights are often overlooked, marginalised, or violated.

This research looks into the impacts of illegal, unreported and unregulated (IUU) fishing and overfishing by industrial vessels on the socio-economic situation of small-scale fishing communities in Ghana. The issues are analysed through a human rights lens, with a focus on the right to decent work and to an adequate standard of living. Working with human rights standards can help illuminate critical issues impacting the realisation of rights of small-scale fishers, while providing the basis for fisherfolks to claim their rights through legal processes and advocacy. They can be used as guidance for formulating policies and initiatives that can support the development of sustainable fisheries and improve livelihoods and dignity of coastal fishing communities.

The study draws on primary data collected in five fishing communities in the Central Region of Ghana. The study focuses specifically on the effects of overfishing and illegal fishing by industrial trawlers in Ghana on local fishing communities, with the caveat that other factors, including overfishing and illegal activities among small-scale fishing communities themselves, are undoubtedly also playing a role in fisheries declines. The vast majority of industrial trawlers in Ghana, although operating under the Ghanaian flag, are controlled and financed by distant water fishing companies based in China<sup>1</sup>.

The information in this study is intended to provide a basis for small-scale fishers, fish workers and their communities, as rights holders, to claim their social and economic rights and to hold the government, as duty bearer, to account for infringements of their rights. There is a role for civil society organisations and Ghana's National Human Rights Institution, the Commission on Human Rights and Administrative Justice (CHRAJ), to build capacity and support small-scale fishing communities to claim access to marine resources and secure their livelihoods through the use of human rights standards and monitoring mechanisms. The findings also provide a basis for the CHRAJ to work with the Fisheries Commission and Ministry for Fisheries and Aquaculture Development to develop and implement a rights-based approach to fisheries management, which prioritises the needs of vulnerable small-scale fishing communities who make up the majority of fish workers in the country yet are often marginalised in decisions concerning their livelihoods.

## Importance of small-scale fisheries in Ghana

- Ghana's marine fisheries provide livelihoods for around 2.5-3 million people<sup>2</sup> along the value chain, or around 10% of the population.
- Small-scale fisheries employ around 107,500 fishermen or 80% of all fishers in Ghana<sup>3</sup>.
- An additional 500,000 individuals are engaged in processing, distribution and marketing of fish throughout Ghana, including many women<sup>4</sup>.
- More than 14,700 canoes<sup>5</sup> operate across 300 landing beaches<sup>6</sup>, accounting for around 11% of canoes in West Africa<sup>7</sup>.
- Ghana has the highest fish dependence in Africa, providing 60% of animal protein intake<sup>8</sup> with a yearly per capital fish consumption of an estimated 28 kg<sup>9</sup>.



## Key findings

The study identified potentially serious human rights issues which are indicative of inadequate measures on the part of the government of Ghana to protect, respect and fulfil the human rights of fishing communities in the country, as required under international law. As duty bearer, Ghana is under a legal obligation to ensure fishing communities enjoy social and economic rights, and to provide remedies in the event these rights are violated.

The study revealed declining incomes and living conditions for small-scale fishers and fish workers, high levels of employment and income insecurity, a lack of access to social security, adequate sanitation and clean water, as well as food insecurity and poor school completion rates, among others. For small-scale fishers and fish workers in Ghana, having no access to employment for three or more months of the year is a relatively common occurrence, with few alternative income generating opportunities available in the communities. As a result of fish population declines, fishers are also travelling further out to sea in search of catches, with implications for their basic safety and well-being. A number of the issues identified relate to Ghana's minimum core obligations under international law, particularly to guarantee the right to social security, to minimum essential food, to free and compulsory primary education for every child, and access to an adequate clean water supply, sanitation and medical services.

Declining fish populations and incomes of fishers, processors and traders point to a failure to protect and fulfil the rights of small-scale fishers and fish workers to work, and to just and favourable conditions of work, including the right to a level of income that allows workers to support themselves and their families. This is impeding realisation and enjoyment by small-scale fishers, fish workers and their families of the right to an adequate standard of living and to the continuous improvement of living conditions. A further concern relates to apparent inequalities in fulfilment of key socio-economic rights for men (fishers) compared to women (processors and traders) in the study, warranting further attention.

The findings indicate that small-scale fishers and fish workers are a vulnerable and marginalised group, calling for special measures to ensure their human rights are respected, protected and fulfilled. This is a group of rights holders that the government of Ghana should be highly concerned about and should prioritise in policymaking.

Critically, there is a need for further investigation by the government of Ghana and the CHRAJ in several key areas to determine whether government acts of omission or commission in relation to the management of the fisheries sector constitute a violation of fundamental human rights. In recent years, the government has failed to address illegal "saiko" fishing<sup>10</sup>, while authorising intensive trawling activity, despite severe declines in artisanal fish landings. The lack of action to prevent trawling companies from violating the right to work of small-scale fishers and fish workers could be construed as retrogressive under international law, resulting in the deterioration of key human rights of fishing communities. In neglecting to regulate these activities, it is unclear whether Ghana is discharging its minimum core obligation to protect the rights of small-scale fishers and fish workers, as a disadvantaged and marginalised group, to access employment that enables them to live a life of dignity.

A summary of the key human rights issues identified is provided below. The study did not attempt to review all possible human rights issues and potential violations, but to highlight key issues for further examination and action.



Fish landed by an industrial trawler operating in Ghana.

## Key human rights issues identified in the study:



Around **80-90%** of fishers and processors/traders surveyed reported **declines in income** over the past five years.



Over **75%** of fishers and **70%** of fish processors/traders reported a **worsening of their living conditions** over the past five years.



Almost **75%** of fishers reported that they encounter **industrial trawlers more frequently** during their fishing expeditions compared to five years ago.



Around **15-20%** of school children in the survey **had left school** prior to completing primary education.



Around **70%** of fishers had suffered **damage to their fishing gear** by industrial trawlers.



Over **50%** of fishers and almost **60%** of processors/traders reported going **without access to sufficient food** over the preceding 12-month period.



In less than **15%** of cases were fishers able to obtain **compensation for damage** caused.



Almost **70%** of fishers and over **40%** of processors/traders had gone **without access to sufficient clean water** during the preceding 12-month period.



Over **93%** of respondents obtained at least **90%** of their **livelihood** from fishing, fish processing or trading activities.



Just **one third** of fisher households and less than **20%** of processor/trader households had access to an improved toilet facility.



Less than **4%** of fishers and **2%** of processors/traders surveyed were participating in a **social security scheme**.



Just over **30%** of fishers and **60%** of processors/traders reported complete coverage of their households under the **National Health Insurance (NHI) scheme**.



## Issue 1: Decline in effective income for small-scale fishers and fish workers in Ghana due to IUU fishing and overfishing

- Almost 95% of fishers reported a decline in landings during the major fishing season.
- Around 70% of respondents perceived the state of the fisheries as “much worse” compared to five years prior to the survey.
- Fisheries declines have resulted in declining incomes which have fallen in many cases below the level of decent remuneration. **Around 80-90% of fishers and processors/traders surveyed reported declines in income over the past five years.**
- Vulnerability has been increased by the COVID-19 pandemic, which has resulted in income losses.
- Fishing expeditions resulting in zero catches are now relatively common: an average of 11.7 zero catch days were reported during the major fishing season (equating to 12.7% of fishing days), and 17.4 zero catch days during the minor fishing season (equating to 19.3% of fishing days).
- Processors and traders reported facing difficulties obtaining sufficient fish to process.
- Average monthly expenditures exceeded income in many cases, resulting in fishers and fish-workers being unable to cover basic needs.



An industrial trawler operating in Ghanaian waters.

## Issue 2: Increasing competition with large-scale, industrial trawl vessels for access to resources

- Competition between small-scale fishers and commercial trawl operators has increased in recent years.
- **Almost 75% of fishers reported that they encounter industrial trawlers more frequently during their fishing expeditions compared to five years ago.**
- Activities of trawlers and saiko operators are having a significant negative impact on small-scale fisher/fish worker livelihoods and their access to fisheries resources.
- The ratio of small-scale compared to industrial trawl catches has declined to almost equal magnitudes when illegal and unreported (saiko) catches are taken into account.
- Fishers are now fishing increasingly beyond the IEZ reserved for small-scale vessels as fish stocks decline, resulting in increased interactions with industrial vessels and presenting risks to health and safety.
- Fishers regularly encounter trawlers in their fishing grounds and suffer damage to their fishing gear.
- Over 90% of fishers had observed trawlers in their fishing grounds during the preceding 12-month period.
- **Around 70% of fishers had suffered damage to their fishing gear by industrial trawlers. In less than 15% of cases were fishers able to obtain compensation for damage caused.**

## Issue 3: Government failure to eliminate the illegal practice of saiko and address other forms of illegal and unsustainable fishing by industrial trawl vessels

- Illegal activities of industrial trawlers and saiko operators are having a significant negative impact on the livelihoods of small-scale fishers and fish workers.
- Saiko continues openly at ports such as Elmina.
- Fishers report illegal incursions into the IEZ by industrial trawlers and sightings of illegal activities.
- Fishers report threats and abuse when trying to approach trawlers fishing illegally within the IEZ.

## Issue 4: High levels of income insecurity and a lack of social security for small-scale fishers and fish workers

- Small-scale fishers and fish workers are highly vulnerable to unemployment and temporary loss of work-related income (due to poor catches, damage to fishing gear, falling fish prices, closed seasons, etc.). Income insecurity is high.
- Reported incomes of fishers and fish workers fall to zero in some of months of the year.
- Over 80% of fishers experienced damage to their fishing gear during the preceding 12-month period yet were rarely able to obtain compensation for losses incurred.
- **Over 93% of respondents obtained at least 90% of their livelihood from fishing, fish processing or trading activities.**
- Just 6.5% of fishers and 3% of processors and traders had received skills upgrading or training to help transition into additional income generating activities.
- **Less than 4% of fishers and 2% of processors and traders surveyed were participating in a social security scheme.**
- Government support in the form of fuel and engine subsidies are not accessible to all fishers when needed.
- Very limited government support is available to women working in fish processing and trading activities.



Fish monger at Elmina market in Ghana's Central Region.



## Issue 5: Living conditions in small-scale fishing communities have worsened in recent years due to declining incomes

- Around 75% of fishers and 65% of processors and traders rated their current living conditions as unsatisfactory.
- **Over 75% of fishers and 70% of fish processors and traders reported a worsening of their living conditions over the past five years.**
- Fisheries declines have resulted in incomes falling below the level necessary to provide a decent living, resulting in fishers and fish workers unable to cover basic needs.

## Issue 6: Incidences of non-attendance or non-completion of primary education, in some cases due to cost

- A minority of fishing households were unable to send their children to primary school due to cost.
- **Around 15-20% of school children in the survey had left school prior to completing primary education.**
- Primary school completion rates were lower for children from processor/trader households compared to fishing households.
- Secondary school completion rate was less than 50% for both boys and girls, and around 5% lower for girls. Cost was the main factor preventing fishers from sending children to school.
- Secondary school completion rates were lower for children from processor/trader households compared to fishing households.

## Issue 7: Food insecurity/lack of access to sufficient food for small-scale fishers, fish workers and their families

- Fisheries and related income declines have had an impact on food availability in fishing communities.
- Almost 80% of fishers and 98% of processors and traders reported declines in the availability of fish for consumption over the preceding five-year period.
- **Over 50% of fishers and almost 60% of processors/traders reported going without access to sufficient food over the preceding 12-month period.**



## Issue 8: Irregular supply of clean drinking water and low rates of access to improved toilet facilities

- Drinking water supplies are irregular, resulting in fishing households regularly going without access to sufficient clean water.
- **Almost 70% of fishers and over 40% of processors and traders had gone without access to sufficient clean water during the preceding 12-month period.**
- High levels of deprivation were reported in relation to sanitation facilities.
- **Just one third of fishing households and less than 20% of processor/trader households had access to an improved toilet facility (flush toilet or Kumasi Ventilated Improved Pit, KVIP, latrine).**
- 18% of fishers and 14% of processors/traders reported lacking access to sanitation facilities altogether, using the beach as their main toilet facility.

## Issue 9: Incomplete coverage of fishing communities by the National Health Insurance scheme; instances of individuals from fishing households going without medical treatment due to cost

- Incomplete coverage of small-scale fishing households by the National Health Insurance (NHI) scheme.
- **Just over 30% of fishers and 60% of processors/traders reported complete coverage of their households under the scheme.**
- Multiple reported instances of individuals going without medical treatment when needed during the preceding 12-month period.
- Inability to access treatment is most commonly due to cost.

## Conclusions and recommendations

Ghana's small pelagic fishery is in a perilous state with severe implications for the economic and social rights of small-scale fishing communities. In addition to regulating industrial trawling activity, improving social and economic safeguards for these workers is particularly crucial in the context of collapsing fishery resources and implementation of measures, such as fishing closed seasons, to stem fisheries declines. There is a need to reform the current programme of subsidies to ensure these are effective in supporting fishers to improve their standard of living and in fulfilling human rights. Reducing fleet capacity is necessary in both the artisanal and industrial sectors but must begin with the industrial fleet and be accompanied by the development of realistic alternative income generating activities for fishing communities.

Improving governance of the sector through enhanced transparency and involvement of small-scale fishing communities in decision-making, particularly in the authorisation of industrial fishing activity, is key to securing the rights of fishers and fish workers to their livelihoods, food security and sustainable development. This should be complemented by specific measures to secure small-scale fisher rights of access to fisheries resources, including through extension of the IEZ boundary to reflect current patterns of canoe fishing effort, and ensuring the IEZ boundary is clearly defined and can be enforced.

A number of recommendations are provided to the government of Ghana, as duty bearer, to address key human rights concerns identified and enhance progress towards the achievement of the 2030 SDG Agenda. These recommendations are summarised in the table below, alongside the human rights issues identified and key provisions of relevant human rights instruments. The recommendations cover aspects such as: improving access to resources for small-scale fishers; addressing overfishing and ensuring the effective regulation of industrial fishing; improving fisheries governance, with a focus on enhancing transparency and accountability; securing meaningful and effective participation of small-scale fishing communities in management and decision-making; providing support for alternative income generating activities, cooperatives and trade associations; and ensuring access to social security protection and essential services. The planned reform of Ghana's fisheries law framework provides an opportunity to establish a clear and unequivocal legal basis to respect, protect and fulfil the human rights of small-scale fishing communities, enshrining into law the recommendations set out in this study.



Artisanal canoes at Winneba landing beach in Ghana's Central Region.

**Table: Recommendations to the government of Ghana to address human rights issues identified in this study, with a focus on decent work and an adequate standard of living**

**(a) Right to work, to free choice of employment and to just and favourable conditions of work**

Issues identified	Relevant human rights obligations	Recommendations to the government of Ghana
<b>Issue 1: Decline in effective income for small-scale fishers and fish workers in Ghana due to IUU fishing and overfishing</b>	<p><u>Human rights instruments:</u></p> <p>Art. 7 ICESCR Art. 18 UNDROP</p> <p><u>Minimum core obligations:</u></p> <p>Para. 31 General Comment No. 18 on the Right to Work</p> <p><u>Key SDG Targets</u></p> <p>Target 2.3 Target 8.5 Target 10.1 Target 12.2 Target 14.2 Target 14.4 Target 14.b Target 14.c</p>	<ol style="list-style-type: none"> <li>1. Take all appropriate measures to secure and prioritise access of small-scale fishers to fisheries resources in the Ghanaian EEZ.</li> <li>2. Prioritise implementation of strict controls on the industrial trawl sector and elimination of harmful practices such as saiko.</li> <li>3. Take immediate and robust enforcement action to end illegal saiko fishing by industrial trawl vessels and ensure trawlers use compliant gear.</li> <li>4. Reduce capacity and fishing effort within the industrial trawl fleet, taking into account both legal and illegal catches including by-catch.</li> <li>5. Adopt and implement a management plan based on best available scientific evidence, in accordance with the precautionary principle and ecosystem-approach to fisheries, to address over-capacity across all fleets, leading with the industrial trawl sector.</li> <li>6. Ensure all offences by industrial trawl vessels are investigated and sanctions applied in accordance with minimum requirements in the law to ensure they have a deterrent effect.</li> <li>7. During the reform of the 2002 Fisheries Act, ensure regulations are in place to prohibit the activities of industrial vessels that undermine the sustainable management of fisheries, e.g., saiko.</li> <li>8. Address illegal and destructive fishing practices by the artisanal fleet.</li> </ol>
<b>Issue 2: Increasing competition with large-scale, industrial trawl vessels for access to resources</b>	<p><u>Human rights instruments:</u></p> <p>Art. 6 ICESCR Art. 4(2)(h) UNDROP Art. XIX Protocol to ACHPR on the Rights of Women in Africa</p> <p><u>Minimum core obligations</u></p> <p>Para. 4 General Comment No. 18 on the Right to Work</p> <p><u>Key relevant SDG targets</u></p> <p>Target 1.4 Target 5.a Target 10.2 Target 14.b Target 16.6 Target 16.7 Target 16.10</p>	<ol style="list-style-type: none"> <li>1. Adopt measures to facilitate equitable access and the granting of preferential access to fishery resources for small-scale fishing communities.</li> <li>2. Extend the IEZ reserved for small-scale fishers to reflect the current fishing patterns of the small-scale fleet. Ensure the IEZ boundary is clearly defined and can be enforced.</li> <li>3. Strictly enforce the IEZ reserved for small-scale fishers and ensure all detected incursions by industrial vessels are investigated and sanctioned in accordance with the law.</li> <li>4. Improve transparency and community participation in decision-making, particularly concerning the allocation of licences to industrial or foreign vessels.</li> <li>5. Establish a mechanism for the provision of inputs from stakeholders and for such inputs to be taken into consideration in deciding whether or not to grant licences to industrial or foreign vessels.</li> <li>6. Require all industrial licences to be subjected to parliamentary approval as required for exploitation of any natural resource by the 1992 Constitution<sup>11</sup>.</li> <li>7. Enshrine in law and fully implement the National Fisheries Co-Management Policy as a basis for meaningful and effective participation of small-scale fishing communities in fisheries management and decision-making and advancing their human rights.</li> <li>8. Set out mandatory requirements for publication of licence lists, access agreements, vessel details including beneficial ownership and sanctions for IUU fishing to improve transparency and accountability in the sector.</li> </ol>



<p><b>Issue 3: Government failure to eliminate the illegal practice of saiko and address other forms of illegal and unsustainable fishing by industrial trawl vessels</b></p>	<p><u>Human rights instruments:</u></p> <p>Arts. 6 and 7 ICESCR</p> <p><u>Minimum core obligations</u></p> <p>Paras. 31 and 32 General Comment No. 18 on the Right to Work</p> <p><u>Key relevant SDG targets</u></p> <p>Target 14.2 Target 14.4 Target 14.b Target 14.c</p>	<ol style="list-style-type: none"> <li>1. Ensure all offences by industrial trawl vessels are investigated and sanctions applied in accordance with minimum requirements in the law to ensure they have a deterrent effect.</li> <li>2. Take immediate and robust enforcement action to end illegal saiko fishing by industrial trawl vessels and ensure trawlers use compliant fishing gear.</li> <li>3. During the reform of the 2002 Fisheries Act, ensure regulations are in place to prohibit the activities of industrial vessels that undermine the sustainable management of fisheries, e.g., saiko.</li> </ol>
<p><b>Issue 4: High levels of income insecurity and a lack of social security for small-scale fishers and fish workers</b></p>	<p><u>Human rights instruments:</u></p> <p>Art. 22 UDHR Art. 9 ICESCR Art. 11(1)(e) CEDAW Art. 4(2)(c) and 22 UNDROP</p> <p><u>Minimum core obligations</u></p> <p>Para. 31, General Comment No. 19 on the Right to Social Security</p> <p><u>Key SDG Targets</u></p> <p>Target 1.3 Target 1.4 Target 1.5 Target 5.a Target 8.3 Target 10.4</p>	<ol style="list-style-type: none"> <li>1. Identify and address barriers to accessing social security schemes by small-scale fishing communities.</li> <li>2. Progressively extend labour protections and social safeguards to small-scale fishers and fish workers in the informal economy, including the national minimum wage, social security, compensation for workplace accidents and mortalities, and retirement benefits. Amend the Labour Act 2003 to include provisions on small-scale fishers and fish workers.</li> <li>3. Establish non-contributory social security programmes, and/or subsidised pension, life and/or health insurance in fishing communities to provide protection in the event of accident or illness.</li> <li>4. Support the development of informal social security schemes, such as community-based insurance (e.g., to cover damage to fishing gear).</li> <li>5. Support development of and access to appropriate financial services at community level, including savings, credit and insurance schemes.</li> <li>6. Provide support to the development of supplementary or alternative income generating opportunities in fishing communities, including through relevant education and vocational training programmes and financial assistance.</li> <li>7. Provide support to fishers and fish workers to organise into cooperatives and trade associations at all stages of the value chain to enhance livelihood security, while strengthening existing cooperatives and trade associations.</li> <li>8. Ensure measures aimed at reducing fishing effort, including closed seasons and capacity reduction, are accompanied by support to small-scale fishers and fish workers in the form of cash transfers or other compensation.</li> <li>9. Reform the current programme of fisheries subsidies to ensure these are effective in supporting fishers to improve their standard of living and in fulfilling human rights.</li> </ol>

**(b) Right to an adequate standard of living, to the continuous improvement of living conditions and to development**

Issues identified	Relevant human rights obligations	Policy recommendations to the government of Ghana
<p><b>Issue 5: Living conditions in small-scale fishing communities have worsened in recent years due to declining incomes</b></p>	<p><u>Human rights instruments:</u></p> <p>Art. 25 UDHR Art. 11 ICESCR Art. 8 DRD Art. 22 ACHPR Art. XIX Protocol to the ACHPR on Rights of Women in Africa</p> <p><u>Key SDG Targets</u></p> <p>Target 2.3 Target 8.3 Target 8.5 Target 10.1 Target 14.2 Target 14.4 Target 14.b</p>	<ol style="list-style-type: none"> <li>1. Take all appropriate measures to secure access of small-scale fishing communities to fisheries resources in the Ghanaian EEZ as a basis for food production and a decent living.</li> <li>2. Implement strict controls on fishing activities and capacity reduction within the industrial trawl sector.</li> <li>3. Eliminate harmful and destructive fishing practices such as saiko.</li> <li>4. Ensure the meaningful and effective participation of small-scale fishing communities in the negotiation of industrial fishing licences and foreign access agreements.</li> <li>5. Promote decent work in small-scale fishing communities to ensure remuneration is sufficient to cover basic needs.</li> <li>6. Develop, adjust or extend social security systems to small-scale fishing communities, ensuring programmes are accessible, context-appropriate (e.g., informal, community-based or non-contributory schemes) and cover at least essential needs.</li> <li>7. For further Recommendations, see under Issue 1 and Issue 4 above on access to decent and productive work and a decent living.</li> </ol>
<p><b>Issue 6: Incidences of non-attendance or non-completion of primary education, in some cases due to cost</b></p>	<p><u>Human rights instruments:</u></p> <p>Art. 26 UDHR Art. 13 ICESCR Art. 17 ACHPR</p> <p><u>Key SDG Targets</u></p> <p>Target 4.1 Target 4.5 Target 4.6</p>	<ol style="list-style-type: none"> <li>1. Develop targeted programmes and policies to address barriers to access to primary education in small-scale fishing communities.</li> <li>2. Implement targeted programmes and policies to develop and improve accessibility of secondary education for every child, directed especially at households of fish processors and traders.</li> <li>3. Provide support to the development of secondary and higher-level education and vocational training programmes in small-scale fishing communities and ensure financial assistance is available for households in need.</li> <li>4. Conduct further research into the causes of marginalisation/inequality that result in lower attendance or completion rates for girls to inform further interventions.</li> </ol>
<p><b>Issue 7: Food insecurity/lack of access to sufficient food for small-scale fishers, fish workers and their families</b></p>	<p><u>Human rights instruments:</u></p> <p>Art. 25 UDHR Art. 11 ICESCR Art. 8 DRD</p> <p><u>Minimum core obligations</u></p> <p>Para. 43, General Comment No. 14 on the Right to the Highest Attainable Standard of Health</p> <p><u>Key SDG Targets</u></p> <p>Target 2.1 Target 2.4 Target 4.1 Target 4.5 Target 4.6 Target 14.b</p>	<ol style="list-style-type: none"> <li>1. Prioritise implementation of measures to improve sustainable fisheries management and secure access for small-scale fishers and fish workers to fisheries resources and markets. See further the Recommendations under Issue 1 and Issue 2 above.</li> <li>2. Consider policy options such as food ration support in times of difficulty, e.g., during closed seasons.</li> <li>3. Develop, adjust or extend social security systems to small-scale fishing communities, ensuring programmes are accessible, context-appropriate (e.g., informal, community-based or non-contributory schemes) and cover at least essential needs. See further Recommendations under Issue 4 above.</li> </ol>

<p><b>Issue 8: Irregular supply of clean drinking water and low rates of access to improved toilet facilities</b></p>	<p><u>Human rights instruments:</u></p> <p>Art. 25 UDHR Art. 11 ICESCR Art. 8 DRD Art. XV Protocol to the ACHPR on the Rights of Women in Africa</p> <p><u>Minimum core obligations</u></p> <p>Para. 43, General Comment No. 14 on the Right to the Highest Attainable Standard of Health</p> <p><u>Key SDG Targets</u></p> <p>Target 6.1 Target 6.2</p>	<p>1. Ensure clean water and sanitation programmes are effectively reaching small-scale fishing communities and address issues related to marginalisation that may be preventing fishing households from accessing these rights.</p>
<p><b>Issue 9: Incomplete coverage of fishing communities by the National Health Insurance scheme; instances of individuals from fishing households going without medical treatment due to cost</b></p>	<p><u>Human rights instruments:</u></p> <p>Art. 25 UDHR Art. 11 ICESCR Art. 8 DRD Art. 16 ACHPR Art. XIV(2) Protocol to the ACHPR on the Rights of Women in Africa</p> <p><u>Minimum core obligations</u></p> <p>Para. 43, General Comment No. 14 on the Right to the Highest Attainable Standard of Health</p> <p><u>Key SDG Targets</u></p> <p>Target 3.8</p>	<p>1. Identify and address barriers to accessing essential health care for small-scale fishing communities</p> <p>2. Adjust existing or develop context-appropriate health insurance schemes that provide at least essential health care for small-scale fishers, fish workers and their families.</p>

Abbreviations: ACHPR – African Charter on Human and Peoples' Rights; CEDAW – Convention on the Elimination of all Forms of Discrimination Against Women; DRD – Declaration on the Right to Development; ICESCR – International Covenant on Economic, Social and Cultural Rights; UDHR – Universal Declaration of Human Rights; UNDROP – United Nations Declaration on the Rights of Peasants and Other People Working in Rural Areas.



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- 3 Republic of Ghana (2014). *National plan of action to prevent, deter, and eliminate illegal, unreported, and unregulated fishing*. Available from: [ftp://ftp.fao.org/fi/DOCUMENT/IPOAS/national/Ghana/NPOA\\_IUU.pdf](ftp://ftp.fao.org/fi/DOCUMENT/IPOAS/national/Ghana/NPOA_IUU.pdf); Dovlo, E., Amador, K., Nkrumah, B. et al. (2016). *Report on the 2016 Ghana Marine Canoe Frame Survey*. Fisheries Scientific Survey Division of the Fisheries Commission, Ministry of Fisheries and Aquaculture Development. August 2016.
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*The material has been financed by the Swedish International Development Cooperation Agency, Sida. Responsibility for the content rests entirely with the creator. Sida does not necessarily share the expressed views and interpretations.*



*The study has been developed with technical support from the Danish Institute for Human Rights. The contents of this publication are the sole responsibility of EJF and do not necessarily reflect the opinion of the Danish Institute for Human Rights.*

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