

LIFTING THE VEIL

Evaluating transparency
in Ghana's fisheries sector



Protecting People and Planet

The Environmental Justice Foundation (EJF) exists to protect the natural world and defend our basic human right to a secure environment.

EJF works internationally to inform policy and drive systemic, durable reforms to protect our environment and defend human rights. We investigate and expose abuses and support environmental defenders, Indigenous peoples, communities and independent journalists on the frontlines of environmental injustice. Our campaigns aim to secure peaceful, equitable and sustainable futures.

EJF is committed to creating effective co-management associations to secure legal and sustainable fisheries. Our investigators, researchers, filmmakers and campaigners work with grassroots partners and environmental defenders across the globe.

Our work to secure environmental justice aims to protect our global climate, ocean, forests, wetlands, wildlife and defend the fundamental human right to a secure natural environment, recognising that all other rights are contingent on this.

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Abbreviations

AIS: Automatic Identification System
CFT: Coalition for Fisheries Transparency
CTA: Cape Town Agreement
EJF: Environmental Justice Foundation
FAO: Food and Agriculture Organisation of the United Nations
FC: Fisheries Commission
FoC: flag of convenience

FSSD: Fisheries Scientific and Survey Division
ILO: International Labour Organisation
IMO: International Maritime Organization
IUU: illegal, unreported, and unregulated fishing
MoFA: Ministry of Fisheries and Aquaculture
NGO: non-governmental organisation
PSMA: Agreement on Port State Measures
VMS: vessel monitoring system

Executive summary

Ghana's fisheries sector is an important source of livelihoods, employing about 10% of the country's population and providing direct employment to over 110,000 fishers, as well as to thousands of fishmongers and fish processors. Illegal fishing and overfishing, however, risk the collapse of Ghana's fish populations, directly undermining the most basic human rights of coastal communities, and costing the country millions of dollars every year. Greater transparency is needed to achieve sustainable, legal, and ethical fisheries.

Ghana has recently demonstrated the political will to improve transparency and accountability in its marine fisheries sector. At the 2025 Our Oceans Conference, the country's Minister for Fisheries and Aquaculture (MoFA), Hon. Emelia Arthur, endorsed the Global Charter for Fisheries Transparency,¹ further committing strongly to beneficial ownership transparency at the United Nations Ocean Conference in June 2025. These announcements have been accompanied by a number of key developments, including the publication of sanctions on the suspension of licences of four industrial trawlers. Despite this progress, however, further action is needed to fully implement all ten principles of the Global Charter. This analysis aims to inform and guide this action, and to assist Ghana in moving from commitment to the Global Charter to full implementation, ensuring that the benefits of transparency are secured for the many Ghanaians who depend on fisheries resources for their livelihoods.



The report benchmarks the transparency of Ghana's fisheries sector against the ten principles of the Global Charter for Fisheries Transparency. Ghana has fully implemented Principle 6, and partially implemented the other principles. The report takes into account relevant provisions of the recently adopted Fisheries and Aquaculture Act, and notes that achieving greater transparency, in large part, depends on the swift and robust implementation of the Act.

EJF recommends that the government of Ghana fully implement the principles of the Global Charter for Fisheries Transparency, with a particular focus on:

- publishing the register of fishing vessels on the Ministry's website and submitting the information for inclusion in the FAO Global Record of Fishing Vessels;
- publishing updated data on fisheries-related infringements and sanctions, at least once per year, specifying the date of the infraction, the name, IMO number and owner of the vessel, the nature of the offence, the settlement procedure, and the sanction adopted;
- making beneficial ownership information disclosed at the point of registration, licensing and authorisation available to the public in a free and easily accessible format;
- requiring fishing vessels to transmit an AIS signal at all times when operating at sea;
- ensuring at-sea trans-shipment between industrial trawlers and canoes remain banned in any future revision of the fisheries law framework; and
- adopting additional regulations to mandate the details of a catch certificate to ensure traceability.

Additionally, EJF recommends that Ghana accede to the 2014 Protocol to the Forced Labour Convention (P029) and to the Convention and Promotional Framework on occupational safety and health (C155 and C187).

1. Introduction

Ghana's fisheries sector is an important source of livelihoods, employing about 10% of the country's population.² It provides direct employment to over 110,000 fishers,³ as well as to thousands of fishmongers and fish processors, in the four coastal regions. The marine fisheries sector is the most important source of local fish production in the country, accounting for up to 70% of total fish catches.⁴ Illegal fishing and overfishing, however, risk the collapse of Ghana's fish populations,⁵ directly undermining the most basic human rights of coastal communities,⁶ and costing the country millions of dollars every year.⁷ A lack of transparency is one of the most important enablers of illegal, unreported and unregulated (IUU) fishing, creating opportunities for fraud and corruption.⁸ Lifting the veil of secrecy and ensuring greater transparency is thus an opportunity to eliminate the corruption and weak governance that allow illegal fishing to persist, and to achieve sustainable, legal, and ethical fisheries.

The Global Charter for Fisheries Transparency

In 2022, the Environmental Justice Foundation (EJF) and international NGO partners established the Global Coalition for Fisheries Transparency.⁹ The Coalition is working to enhance transparency and accountability in fisheries around the world through the implementation of the Global Charter for Fisheries Transparency.¹⁰ The Charter is centred around 10 low- or no-cost, practical policy principles. These principles identify the most essential transparency priorities needed to improve equity in fisheries and combat illegal fishing and human rights abuses at sea.

To manage fisheries sustainably, stakeholders need to be able to access all relevant information: where and when fishing vessels are operating, for what and how they are fishing, who is working on board, and under what conditions. Delivering transparency across all aspects of seafood production and supply chains, through improved legal requirements and operational practices within fisheries management regimes, would be transformative in the shift towards sustainable, legal and ethical global fisheries.

Recent progress in Ghana regarding fisheries transparency





















Ghana has recently demonstrated the political will to improve transparency and accountability in its marine fisheries sector. At the 2025 Our Oceans Conference, the country's Minister for Fisheries and Aquaculture endorsed the Charter for Fisheries Transparency,¹¹ further committing strongly to beneficial ownership transparency at the United Nations Ocean Conference in June 2025. These announcements have been accompanied by a number of key developments. In April 2025, the government took decisive action against several industrial trawlers for repeated fisheries violations, suspending their licences and publishing details of the sanctions on the Ministry's website,¹² an example of applying Principle 2 of the Global Charter. Meanwhile, in August 2025, the country adopted a new Fisheries and Aquaculture Act, which enshrines key transparency principles, such as the publication of vessel licence lists, into law.

Despite this progress, however, further action is needed to fully implement all ten principles of the Global Charter. In particular, critical gaps remain in the legislative framework, which will need to be closed through the development of secondary legislation to further strengthen the recently adopted fisheries law.

This analysis aims to inform and guide Ghana's next actions by evaluating fisheries transparency against the principles of the Global Charter, drawing on the progress made by Ghana so far and identifying the gaps and priorities for action. The analysis aims to assist Ghana in moving from commitment to the Global Charter to full implementation, ensuring that the benefits of transparency are secured for the many Ghanaians who depend on fisheries resources for their livelihoods.

2. Findings

Summary – Implementation status of the key principles of the Global Charter for Fisheries Transparency by Ghana:

| | | | | | |
|-------------------------|----|---|---|---|-----------------------|
| VESSEL INFORMATION | 1 |  | Require unique identification numbers for all fishing vessels. |  | Partially implemented |
| | 2 |  | Publish lists of licenses, authorisations, and sanctions. |  | Partially implemented |
| | 3 |  | Make public the beneficial ownership of vessels. |  | Partially implemented |
| | 4 |  | Stop the use of flags of convenience by fishing vessels. |  | Partially implemented |
| FISHING ACTIVITY | 5 |  | Make vessel position data public. |  | Partially implemented |
| | 6 |  | Ban or closely monitor at-sea trans-shipment. |  | Fully implemented |
| | 7 |  | Mandate seafood traceability from boat to plate. |  | Partially implemented |
| GOVERNANCE & MANAGEMENT | 8 |  | Ratify international agreements that set standards for fishing vessels and trade. |  | Partially implemented |
| | 9 |  | Ensure public and equitable access to fisheries data and participation in fisheries management and decision-making. |  | Partially implemented |
| | 10 |  | Collect data on the conditions of fishing vessel crews and publish it in aggregate form. |  | Partially implemented |



PRINCIPLE 1: Require unique identification numbers for all fishing vessels.

Ghanaian law requires that anyone applying to register a fishing vessel under the Ghanaian flag must provide the International Maritime Organisation (IMO) number of the fishing vessel. However, IMO numbers are not required as a condition for foreign-flagged vessels to obtain a licence to fish in Ghanaian waters.

Status: Partially implemented



PRINCIPLE 2: Publish lists of licences, authorisations, and sanctions.

Ghana's recently adopted Fisheries and Aquaculture Act mandates the keeping and publication of a licence registry, subject to the provisions of the Data Protection Act. However, there is no requirement for the record of fishing authorisations (Ghanaian vessels authorised to fish outside of Ghanaian waters) to be made publicly available.

Regarding sanctions, the 2025 Act mandates the publication of summary proceedings of the Compounding Offences Committee and details of third-time IUU fishing offenders. In the past, sanctions have only been published occasionally for some vessels.

Status: Partially implemented



PRINCIPLE 3: Make public the beneficial ownership of vessels.

Ghanaian law requires the declaration of beneficial owners when registering a vessel under the Ghanaian flag, and for the approval of a licence to fish in Ghanaian waters, for both Ghanaian- and foreign-flagged vessels. There are, however, no laws requiring the information on beneficial owners to be made public.

Status: Partially implemented



PRINCIPLE 4: Stop the use of flags of convenience by fishing vessels.

While Ghana does not have an open registry, evidence strongly suggests that many vessels registered under the Ghanaian flag are controlled by foreign beneficial owners.¹³ This raises concerns over attempts to circumvent the legal framework applying to foreign-flagged vessels and the use of the Ghanaian flag as a flag of convenience.

The legal regime governing the operation of foreign-flagged vessels in Ghanaian waters also appears to have been weakened; access agreements are no longer required to include, as a minimum condition, a clause establishing the responsibility of the flag state to take measures to ensure compliance by vessels flying its flag with applicable laws. There is also no general requirement for the licensing of foreign-flagged vessels that the flag state be in a position to effectively fulfill its obligations.

Status: Partially implemented



PRINCIPLE 5: Make vessel position data public.

Ghanaian law provides for a monitoring device as prescribed by the Commission – which must include an automatic identification system (AIS) – to be fitted on a vessel before an application for a licence can be approved. However, the continuous transmission of AIS positions is not required. There are no provisions mandating that vessel monitoring system (VMS) position data be made public.

Status: Partially implemented



PRINCIPLE 6: Ban or closely monitor at-sea trans-shipment.

Trans-shipments at sea are banned under Ghanaian law. There is, however, a lack of clarity surrounding the specific conditions under which trans-shipment may be authorised in port.

Status: Fully implemented



PRINCIPLE 7: Mandate seafood traceability from boat to plate.

Ghana's fisheries regulations establish a catch certification regime for the export of fish products. However, some key data elements are not required to be recorded, such as the identification of exporter and importer companies. New regulations will need to be adopted to complement existing requirements.

Status: Partially implemented



PRINCIPLE 8: Ratify international agreements that set standards for fishing vessels and trade.

Ghana's fisheries law mandates the Fisheries Commission to ensure the long-term conservation, development, management and utilisation of fisheries resources through the implementation and enforcement of international fisheries agreements and treaties. Ghana is a party to the Agreement on Port State Measures (PSMA) and to the ILO Work in Fishing Convention (C188), and has acceded to the IMO Cape Town Agreement.

It is also a party to most fundamental ILO conventions, but has yet to become a party to the 2014 Protocol to the Forced Labour Convention (P029), the 1981 Occupational Safety and Health Convention (C155), and the 2006 Promotional Framework for Occupational Safety and Health Convention (C187).

Status: Partially implemented



PRINCIPLE 9: Ensure public and equitable access to fisheries data and participation in fisheries management and decision-making.

Fisheries data are not readily available on government websites, but can be obtained upon request or on third-party websites. The national fisheries co-management policy is up-to-date and available. Other fisheries management plans are available. Small-scale fishers, as well as all other fisher associations, are fully represented in co-management and advisory committees.

Status: Partially implemented



PRINCIPLE 10: Collect data on the conditions of fishing vessel crews and publish it in aggregate form.

Although fishing vessel crews now have contracts, there are currently no publicly available records on the working and living conditions of crew members.

Status: Partially implemented

3. Conclusion

This briefing has analysed the level of transparency in Ghana's fisheries sector, benchmarked against the ten principles of the Global Charter for Fisheries Transparency. It found that Ghana has partially implemented most of the principles, while falling short on key aspects. The recently adopted Fisheries and Aquaculture Act has set out the legal basis and requirements for the routine publication of key information, including lists of licences and details of out-of-court settlements reached for fisheries offences, as well as provisions for mandatory AIS.

However, there key gaps remain, including around public access to data on vessel beneficial ownership. While the existing Fisheries Regulations remain in force, these must be updated to address gaps in the Act, clarify outstanding issues - including details of the fish product traceability system - and support the consistent application of the legal framework. It is also critical to ensure that existing regulations that strengthen aspects of the transparency principles, such as the ban on transshipment (Principle 6), are not watered down in the new regulations. In addition, the swift and robust implementation of the Act will be fundamental to achieving greater transparency.



4. Recommendations

EJF recommends that the government of Ghana fully implement the principles of the Global Charter for Fisheries Transparency, with a particular focus on the following measures:

Vessel information (Principles 1 - 4)

- Publish the register of fishing vessels on the Ministry's website and submit the information for inclusion in the FAO Global Record of Fishing Vessels.
- Publish updated data on fisheries-related infringements and sanctions, making it publicly available, at least once per year, specifying the date of the infraction, the name, IMO number and owner of the vessel, the nature of the offence, the settlement procedure, and the sanction adopted.
- Make beneficial ownership information (disclosed at the point of registration), licensing and authorisation available to the public in a free and easily accessible format.
- Ensure that vessels controlled by foreign entities are not eligible for registration under the Ghanaian flag, and are instead required to operate in the framework of robust and transparent access arrangements, in line with all Charter principles.

Fishing activity (Principles 5 - 7)

- Require fishing vessels to transmit an AIS signal at all times when operating at sea.
- Ensure at-sea trans-shipment between industrial trawlers and canoes remains banned in any future revision of the fisheries regulations.
- Adopt additional regulations to mandate the details of a catch certificate to ensure traceability, including the recording of standardised key data elements such as identification of exporter and importer companies, vessel identification, and processing location.

Governance and management (Principles 8 - 10)

- Accede to the 2014 Protocol to the Forced Labour Convention (PO29) and to the Convention and Promotional Framework on occupational safety and health (C155 and C187).
- Publish all fisheries data compiled by the Fisheries Scientific Survey Division (FSSD) and the studies the division carries out, as well as minutes of the meetings of relevant committees, and annual reports on progress towards the implementation of the Fisheries Management Plan, on the website of the Fisheries Commission/Ministry.
- Collaborate with the Ghana Maritime Authority to collect and publish aggregated information about crew working on board industrial fishing vessels and their working conditions.



Annex

| GCFT requirement | status | legal provisions / source | notes |
|---|------------------------------|---|---|
| Principle 1: Require unique identification numbers for all fishing vessels (including transport and supply vessels). | | | |
| Mandate IMO numbers for all eligible vessels as a requirement of registration and licensing. | Partially implemented | Fisheries and Aquaculture Act 2025 (Act 1146), Section 58(2)(a) Fisheries Regulations 2010 (L.I. 1968) as amended by L.I. 2217, Section 24A(2)(l) | An IMO number is required to register a fishing vessel under the Ghanaian flag. However, IMO numbers are not currently required as a condition for licensing foreign fishing vessels to fish within Ghanaian waters. |
| Implement a national unique vessel identifier scheme for non-eligible vessels. | Fully implemented | Fisheries and Aquaculture Act 2025 (Act 1146), Section 54(3)(a) Semi-industrial and Artisanals Fisheries Regulations 2010 (L.I. 1968), Sections 3(3) and 4(1). Fisheries Regulations 2010 (L.I. 1968), Form D | The Fisheries Commission allocates unique identification numbers when issuing a permit for the construction of a semi-industrial vessel or canoe. Motorised (industrial and semi-industrial) fishing vessels are allocated a unique identification number by the Fisheries Commission at the point of licensing. Transfer of an identification number to another vessel is expressly prohibited. An operator of a canoe is also required to provide the canoe's registration number as a condition of licensing. |
| Maintain a vessel registry. | Fully implemented | Ghana Shipping Act, 2003 (Act 645), Section 13(1)(b) and (3) | The Ghana Shipping Act requires that the registrar of ships maintain a registry of ships, including fishing vessels. |
| Principle 2: Publish lists of licences, authorisations, and sanctions. | | | |
| Publish up-to-date lists of fishing licences and authorisations. | Partially implemented | Recent publication of fishing licences ¹⁴ Fisheries and Aquaculture Act 2025 (ACT 1146) Section 77(3) Fisheries Regulations 2010 (L.I. 1968) as amended by L.I. 2217, Sections 24G and 24J | The Fisheries and Aquaculture Act requires the Fisheries Commission to maintain and publish the register of fishing licences, subject to the provisions of the Data Protection Act 2012 (Act 843). The Commission is required to maintain a record of Ghanaian-flagged fishing vessels that are authorised to fish outside of Ghanaian waters. There is no requirement for the record of fishing authorisations to be made publicly available; however, the Commission may provide information from the record to a foreign government, international organisation or regional organisation on receipt of a written request. |
| Ensure public access to vessel registries. | Partially implemented | Fisheries Regulations 2010 (L.I. 1968) as amended by L.I. 2217, Section 24J | There are provisions mandating the publication of information about registered shipping vessels, including fishing vessels. However, the provisions regulating access to the Register do not allow for public access. Ghana has made some data on its fishing fleet publicly available via the FAO Global Record. However, the information is incomplete. |
| Provide all information to the FAO Global Record of Fishing Vessels (including all eligible vessels over 12 metres length overall). | Partially implemented | FAO - Global Record of Fishing Vessels ¹⁵ | Ghana is listed as a data provider on the website of the FAO's Global Record of Fishing Vessels. However, the data appear to be incomplete, particularly for the trawl fleet, with some currently licenced vessels missing entirely. |

| | | | |
|---|------------------------------|--|---|
| Publish information about arrests and sanctions imposed on individuals and companies for IUU fishing activities, human trafficking, and other related crimes. | Partially implemented | <p>Fisheries and Aquaculture Act 2025 (Act 1146), Sections 49(5)(b) and 148</p> <p>Ministry of Fisheries and Aquaculture and Fisheries Commission suspend licences of four industrial vessels¹⁶</p> | <p>The Act makes provision for the publishing of a third-time offender in the IUU list or register of RFMOs. It also mandates the compounding offences committee to publish summary proceedings on the Commission's website, which includes details such as the name of the offender, the amount compounded and the status of payment.</p> <p>In the past, information on sanctions imposed has been released on an ad hoc basis; for example, when the government imposed a US\$1 million fine for IUU fishing in 2019,¹⁷ and recently the suspension of the licences of four industrial trawlers for trans-shipment and other repeated offences.¹⁸</p> <p>Basic statistics on arrests and sanctions are occasionally available in the Commission's annual reports, but these are not consistently made available to the public.</p> <p>The law does not provide for the publication of information on human trafficking and other related crimes.</p> |
| Principle 3: Make public the beneficial ownership of vessels. | | | |
| Require companies to provide information on true beneficial ownership when applying for a fishing licence, fishing authorisation or registration. | Fully implemented | <p>Fisheries Regulations 2010 (L.I. 1968) as amended by L.I. 2217, Sections 24A(2)(e) and 24G(2)(f)</p> <p>Fisheries and Aquaculture Act 2025 (Act 1146), Sections 58(2)(d), 59(2)(j), 61(2)(j), and 170</p> <p>Companies Act 2019 (Act 992), Section 13(2)(m)</p> | <p>Details of beneficial ownership must be provided when registering a vessel under the Ghanaian flag and, both for Ghanaian and foreign vessels, when applying for a licence to fish. Details of beneficial ownership are also included in the record of Ghanaian-flagged vessels authorised to fish in external waters.</p> <p>The definition of a beneficial owner has been updated in the Act to reflect the definition in Ghana's Companies Act, 2019 (Act 992). To note that the Companies Act requires all companies, including fishing companies, to report the company's beneficial owner (as opposed to the vessel's beneficial owner) at the point of incorporation.</p> |
| Publish information about beneficial ownership in all public lists. | Not implemented | Companies Act 2019 (Act 992), Sections 35 and 36 | There are currently no provisions mandating the publication of information about vessel beneficial ownership in public lists. It is, however, noted that under the Companies Act, details of a company's beneficial owners are to be included in a register of members maintained by the company and made available for inspection by the public upon payment of a fee. |
| Principle 4: Stop the use of flags of convenience by fishing vessels. | | | |
| Close open registries to fishing vessels. | Partially implemented | Fisheries and Aquaculture Act 2025 (Act 1146), Section 58(1) | There is an ambiguity in the definition of a Ghanaian industrial fishing vessel, which can make it possible for foreign-owned or controlled vessels to be registered under the Ghanaian flag: it is unclear whether it is the vessel's beneficial owner or the company's beneficial owner who has to be a Ghanaian national. |
| Stop the use of flags of convenience by vessels fishing in national waters. | Not implemented | | There is no requirement for the licensing of foreign-flagged vessels that the flag state be in a position to actually exercise its obligations. |
| Maintain a register of vessels owned by nationals but flagged to other countries. | Unable to assess | | Unable to find provisions to that effect. |

| Principle 5: Make vessel position data public. | | | |
|---|------------------------------|--|---|
| Require automatic identification systems for fishing vessels. | Fully implemented | Fisheries and Aquaculture Act 2025 (Act 1146), Sections 58(3), 59(3), 61(3), and 170 | <p>The Act makes provision for a 'monitoring device' as prescribed by the Commission to be fitted on a vessel before an application for a licence can be approved. It goes on to define a 'monitoring device' as a system that must include an automatic identification system.</p> <p>There is, however, no requirement that AIS positions be continuously transmitted.</p> |
| Make unedited vessel monitoring system (VMS) data public with regular transmission intervals sufficient to ensure vessels can be effectively tracked. | Not implemented | Fisheries Regulations 2010 (L.I. 1968) as amended by L.I. 2217, Section 47(1) | There are currently no provisions mandating public access to VMS data. |
| Principle 6: Ban or closely monitor at-sea trans-shipment. | | | |
| Implement a ban on trans-shipments at sea unless pre-authorised, subject to robust and verifiable electronic monitoring, and covered by a human observer scheme appropriate to the fishery. | Fully implemented | <p>Fisheries and Aquaculture Act 2025 (Act 1146), Sections 157 and 158</p> <p>Fisheries Regulations 2010 (L.I. 1968), Section 33</p> | <p>Trans-shipments may only be carried out with the prior authorisation of the Fisheries Commission in designated ports.</p> <p>It is essential that these conditions are not watered down in the new regulations but strengthened to ensure trans-shipment remains banned.</p> <p>In the case of tuna, trans-shipments may not be carried out without a licence or authorisation and unless the tuna is first landed in the country.</p> |
| Principle 7: Mandate seafood traceability from boat to plate. | | | |
| Mandate the recording of standardised key data elements (vessel identification, identification of exporter and importer companies, product type, species name, weight, date of catch, area of catch, catch method or fishing gear, port of landing, processing location). | Partially implemented | Fisheries Regulations 2010 (L.I. 1968) as amended by L.I. 2217, Sections 24Z-24DD | <p>While the current provision provides details of issuing catch certification, some key data elements, such as the identification of exporter and importer companies, are not required to be included in the catch certificate.</p> <p>There are also no other specific pieces of legislation requiring traceability and the sharing of such information.</p> |
| Principle 8: Ratify international agreements that set standards for fishing vessels and trade. | | | |
| Agreement on Port State Measures to Prevent, Deter and Eliminate Illegal, Unreported and Unregulated Fishing | Fully implemented | | Ghana is a party to PSMA. |
| ILO Declaration on Fundamental Principles and Rights at Work | Partially implemented | | Ghana is a party to most fundamental ILO conventions except P029, C155 and C187. |
| ILO Convention (no. 188) Concerning Work in the Fishing Sector | Fully implemented | | Ghana has ratified C188. |
| IMO Cape Town Agreement | Fully implemented | | Ghana has acceded to the Cape Town Agreement. |

Principle 9: Ensure public and equitable access to fisheries data and participation in fisheries management and decision-making.

| | | | |
|---|------------------------------|---|--|
| Publish all collected fisheries data and scientific assessments in order to facilitate access to information for small-scale fishers, fish workers, indigenous communities, industry associations, and civil society in developing fisheries rules, regulations, subsidies and fisheries budgets, and decisions on access to fisheries resources. | Partially implemented | | Fisheries data are not readily available on government websites, but can be obtained upon request. The 'reports' link on the Ministry's website is inactive. |
| Make the processes, policies, and decisions relating to participatory fisheries management easily accessible to the public and enforcement agencies. | Fully implemented | Fisheries and Aquaculture Act 2025 (Act 1146), Sections 13–15 and 38(5) | <p>Small pelagic co-management committees are established in all four coastal regions of the country and include artisanal fishers. Other co-management committees and advisory committees, such as the Fisheries Management Operational Committee and the Scientific and Technical Committee, are established.</p> <p>The Co-management Policy, as well as other policies such as the Fisheries Management Plan and National Fisheries and Aquaculture Policy, are publicly accessible on the ministry's website.</p> |

Principle 10: Collect data on the conditions of fishing vessel crews and publish it in aggregate form.

| | | | |
|---|------------------------------|---|--|
| Collect and verify data on the nationality, age, race and gender of crew, as well as contractual terms, recruitment agencies, location and means of joining vessels, and conditions on vessels. | Partially implemented | <p>Ghana Shipping Act 2003, Sections 108–109</p> <p>Fisheries and Aquaculture Act 2025 (Act 1146), Section 58(2)(f)</p> <p>Fisheries Regulations 2010 (L.I. 1968), Form A</p> | <p>Crew are provided with contracts, which have some basic data and spell out the terms and conditions of their engagement. Additionally, the technical division of the Ghana Maritime Authority is mandated to inspect the working and living conditions for crew on board ships.¹⁹ It is, however, not known whether this data is verified.</p> <p>The 2025 Fisheries and Aquaculture Act includes a provision requiring the conditions of service of fishers to be disclosed in order for a Ghanaian vessel to obtain a licence.</p> <p>The pro forma application for a fishing licence includes a requirement for the crew list to be provided.</p> |
| Ensure information about crew is publicly available in aggregated form. | Not implemented | | Although there is a list of certified seafarer recruitment and placement service providers on the website of the Ghana Maritime Authority, ²⁰ there is no aggregated information on fishing vessel crew or their working conditions on the websites of either the Ghana Maritime Authority or the Fisheries Commission. |

- 1 Coalition for Fisheries Transparency (2023) <https://fisheriestransparency.net/>
- 2 Ministry of Fisheries and Aquaculture Development (2022). National fisheries and aquaculture policy. Republic of Ghana. 64pp.
- 3 MOFAD/FC (2022). 2022 Ghana marine canoe frame survey. Information report No. 37. Republic of Ghana. 109pp.
- 4 Doku, B. N. A., Chen, S., Alhassan, E. H., Abdullateef, Y., & Rahman, M. M. (2018). Fisheries resources of Ghana: present status and future direction. *Fisheries*, 3(4).
- 5 EJF (2022). *On the precipice: Crime and corruption in Ghana's Chinese-owned trawler fleet*. https://ejfoundation.org/resources/downloads/On-the-precipice_crime-and-corruption-in-Ghanas-Chinese-owned-trawler-fleet.pdf
- 6 EJF (2021). *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*. <https://ejfoundation.org/resources/downloads/EJF-DIHR-socio-economic-report-2021-final.pdf>
- 7 EJF (2021). *At what cost? How Ghana is losing out in fishing arrangements with China's distant water fleet*. <https://ejfoundation.org/resources/downloads/EJF At-What-Cost -2021 final.pdf>
- 8 Freitas (2021). Beneficial ownership in the fishing sector and links to corruption. https://www.worldwildlife.org/pages/tnrc-topic-brief-beneficial-ownership-in-the-fishing-sector-and-links-to-corruption#_ftn2 (accessed on 13 May 2025).
- 9 Coalition for Fisheries Transparency (2023) <https://fisheriestransparency.net/>
- 10 *ibid*
- 11 EJF (2025). *Ghana backs Global Fisheries Transparency Charter: a breakthrough for ocean governance and accountability*. <https://ejfoundation.org/news-media/ghana-backs-global-fisheries-transparency-charter-a-breakthrough-for-ocean-governance-and-accountability>
- 12 MOFA (2025). Ministry of fisheries and aquaculture and the fisheries commission suspend fishing licences of four industrial vessels for repeated illegal transshipment and other offences <https://www.mofad.gov.gh/press-release/ministry-of-fisheries-and-aquaculture-and-the-fisheries-commission-suspend-fishing-licences-of-four-industrial-vessels-for-repeated-illegal-transshipment-and-other-offences/> (accessed 16 May 2025)
- 13 EJF and Hen Mpoano (2019). *Stolen at sea. How illegal 'saiko' fishing is fuelling the collapse of Ghana's fisheries*. https://ejfoundation.org/resources/downloads/Stolen-at-sea_06_2019.pdf
- 14 Fisheries Commission (2025). List of licenced vessels for the first quarter of 2025. <https://fishcom.gov.gh/wp/wp-content/uploads/2025/01/MCS-UPDATE-1ST-QTR-2025.pdf>. Accessed 27 May 2025.
- 15 FAO Global Record Website <https://globalrecord.fao.org/advanced-search>
- 16 MOFA (2025). Ministry of Fisheries and Aquaculture and Fisheries Commission suspend licences of four industrial vessels <https://www.mofaq.gov.gh/press-release/ministry-of-fisheries-and-aquaculture-and-the-fisheries-commission-suspend-fishing-licences-of-four-industrial-vessels-for-repeated-illegal-transshipment-and-other-offences/>
- 17 EJF (2019). *Trawler fined for targeting undersized fish with illegal nets in Ghana*. <https://ejfoundation.org/news-media/trawler-fined-for-targeting-undersized-fish-with-illegal-nets-in-ghana>.
- 18 Mensah (2025). Fisheries Ministry, Commission suspend licences of four industrial vessels. <https://www.graphic.com.gh/news/general-news/ghana-news-fisheries-ministry-commission-suspend-licences-of-4-industrial-vessels.html>.
- 19 <https://ghanamaritime.gov.gh/divisions/>
- 20 <https://ghanamaritime.gov.gh/srpa-licenses/#>

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