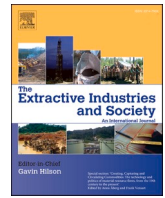




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Original article

## Ghana's adoption of the Extractive Industries Transparency Initiative (EITI): The path from data disclosure to community accountability

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### ABSTRACT

The Extractive Industries Transparency Initiative (EITI) is a global standard that aims to promote greater accountability and transparency in the extractive sector. Drawing on research carried out in Ghana to assess the impact of the Ghana EITI (GHEITI) at the community level, this paper asks: Is there variation between mining communities in the level of awareness of GHEITI and royalty disbursements to rural districts, and if so, what might this mean for improving accountability to mining communities? Unearthing variation is important, as it can help to identify roadblocks to improved accountability to mining communities which can inform appropriate policy interventions. Recognizing the heterogeneity of communities, the exploratory research considers the potential role of accountability mechanisms, such as community outreach activities of GHEITI, and advocacy on the part of civil society organisations (CSOs) in enhancing awareness. The research builds on studies that examine local dynamics that tend to be lost in national-level analyses.

### 1. Introduction

It has been almost twenty years since the Extractive Industries Transparency Initiative (EITI) was formally launched in London in 2003, with a mandate to improve governance of the extractive sector through increased transparency and accountability. While there have been significant improvements in disclosures of royalty payments, revenues and the legal and regulatory regime in the national governance of the extractive sectors in participating countries, the theoretical literature on EITI has been largely critical of its performance, pointing to a variety of factors explaining the failure of increased transparency to produce the desired accountability to the 'public' and more specifically, communities affected by extraction (Andrews, 2016; Smith et al. 2012; Sovacool, 2020). The motivation for the research presented in this paper was to address the question as to whether it might be possible to identify variation in community engagement with EITI, understood as differences in the levels of awareness of EITI's existence and the initiatives it

undertakes, such as disclosure of royalty payments. If variation was uncovered, it would then be possible to explore what this might mean for improving accountability to mining communities.

As a founding member of the global EITI, Ghana's EITI (GHEITI) has taken a number of important steps at the *national* level to improve and strengthen the regulatory regime related to extraction in the mining, and more recently, oil and gas sectors.<sup>1</sup> Notwithstanding GHEITI's leading role in requiring *subnational* disclosure of royalty payments, accountability remains an elusive goal. Challenges include the lack of awareness of various local level actors in mining areas, such as government officials and community representatives, of the existence of GHEITI, political dynamics that weaken the agency of economically vulnerable communities, and the failure of the initiative to result in positive benefits to mining communities through the anticipated enhanced accountability (Andrews, 2016; Sovacool et al., 2016; Standing and Hilson, 2013).

While acknowledging these criticisms, as noted by Rustad et al. (2017), very few studies have tracked the level of public awareness of

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<sup>1</sup> Important innovations have been made on the petroleum side through the Public Interest and Accountability Committee (PIAC) of the Petroleum Revenue Management Act (PRMA). Although not directly relevant to this paper, readers may wish to consult Sefa-Nyarko et al. (2021) for more detail.

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EITI within participating countries (for a notable exception, see Awortwi & Nuvunga, 2019). Our study contributes to the growing body of research on the local adoption of transparency and accountability initiatives, where key elements of community dynamics in mining areas include a lack of responsiveness to community demands and limited access and inclusion in decisions affecting their lives (Garvey and Newell, 2005; Moldaliev, 2021; Oppong, 2017; Smith et al., 2012).

The exploratory research assists in the identification of patterns that serve as a starting point to explaining variation in levels of awareness of GHEITI and subnational royalty payments. The research asks: How might variation in awareness be understood? The conceptual approach draws on Garvey and Newell's (2005) framework for understanding community-level dynamics that assist in identifying when and how communities are able to mobilize around information disclosure. Garvey and Newell (2005) argue that the success of accountability mechanisms depends on: 1. whether actors are *responsive* to community demands, 2. whether there is increased *representation* of previously marginalized groups and 3. whether there is improved *accessibility* to or *inclusion* in decisions affecting community members' lives. While Garvey and Newell (2005) employed their understanding of accountability to *corporate* accountability, this paper applies it to *government* accountability. The conceptual approach adopted in the research further builds on Awortwi and Nuvunga (2019), who identify necessary conditions that would need to be present for communities to mobilize around information disclosure. These relate to the quality of information disclosed, which in this study refers to its relevance to community members. The second condition relates to whether or not information is 'actionable', which means people are in a position to be empowered by the information, which is typically not the case for economically vulnerable and politically marginalized communities (Awortwi and Nuvunga, 2019, pp. 16-17).

Unfortunately, limited research has so far been conducted on the contingent dynamics at the local level that create enabling conditions for improved accountability under certain circumstances and time frames. Consequently, the focus on levels of awareness is justified by the fact that it is a necessary precondition to enhanced accountability, understood as answerability to the public and enforceability of regulations calling for information disclosure (Garvey and Newell, 2005). The first step towards accountability is awareness - that relevant information reaches communities. Our research assists in the identification of patterns that serve as a starting point to understanding variation in levels of awareness of GHEITI and subnational royalty payments, in order to consider the potential roles of accountability enhancing mechanisms initiated by both government (GHEITI) and CSOs in local communities to raise awareness.

Against this background, the specific objectives of this paper are to:

- (1) Uncover the extent to which there is variation in the level of awareness of GHEITI and royalty payments to the districts, and
- (2) Explore the potential role of various accountability mechanisms in raising awareness, such as GHEITI's outreach campaigns and the advocacy of CSOs, in mining districts.

The next section reviews the literature on EITI implementation, especially as it relates to the local level in mining areas. Section three explains the research methodology followed by the presentation of the findings in section four. Section five relates the findings to the broader theoretical literature and the conclusion considers the policy and theoretical implications of the findings.

## 2. Literature review

The existing literature on EITI has documented the failure of increased transparency to bring about improved accountability in participating countries (Aaronson, 2011; Hilson and Maconachie, 2009; Idemudia, 2013; Kolstad and Wiig, 2009). Comprised of

multistakeholder actors from the private sector, government and civil society, EITI governance at the global and national levels strives to reconcile complex challenges manifested in disputed meanings of the core concepts of transparency and accountability and the different motivations of participants (Andrews, 2016; Ofori and Lujala, 2015; Sovacool et al., 2016). Aside from the burden of the accounting procedures for data disclosure, the focus on revenue rather than expenditure transparency remains a key weakness (Carlitz, 2013; Idemudia, 2013; Kolstad and Wiig, 2009), as reflected in the 2019 standard, which 'encourages', but does not require, expenditure disclosure (EITI, 2019: Para 5.3).

These challenges contribute to the ineffectiveness of EITI in enhancing accountability to communities at the local level in areas of extraction. Early assessments of EITI identified its limited impact in mobilizing citizens to hold corrupt government officials accountable (Hilson and Maconachie, 2009; Idemudia, 2013), and the limited awareness and inadequate participation of civil society in the EITI process (Aaronson, 2011). Initiatives such as the requirement that participating countries establish Multistakeholder Groups (MSGs) representing industry, government and civil society (through CSOs), together with the Civil Society Protocol (EITI, 2015), have sought but failed to improve accountability to communities (Aguilar et al., 2011; Klein, 2017; Van Alstine, 2017; Sovacool, 2020). Aside from the highly technical nature of EITI reports and the lack of direct relevance of the information provided to community members (Balag'Kutu, 2017; Kolstad and Wiig, 2009), the literature on the local community impact highlights dynamics that forestall the expected increased accountability (Awortwi and Nuvunga, 2019; EITI, 2020; Moldaliev, 2021; Smith et al., 2012).

Fundamentally, the failure of EITI to have meaningful impact on communities reflects EITI's assumptions on the nature of transparency and accountability, which are grounded in liberal norms of democratic accountability and liberal democratic understandings of civil society (Haufler, 2010; Whitfield, 2003). The interconnected nature of EITI, which operates at multiple levels (global, national, subnational, local), expects multiple actors (societal, corporate, government) to work together towards the promotion of transparency and accountability. Elsewhere referred to as an 'Open Governance' framework (Sefa-Nyarko et al., 2021), this transparency and accountability 'ecosystem' expects that state, societal and corporate actors will work in a circular, reinforcing manner through public oversight and appropriate laws and institutions supportive of transparency and accountability.

EITI defines transparency as 'openness and public disclosure of activities' and accountability as 'the obligation of an individual or organisation to account for its activities, to accept responsibility for them, and to disclose results in an open manner' (EITI, 2021). EITI's approach places the onus on citizens and/or CSOs to respond to information disclosures, to 'demand' that government take responsibility and presumably, change its behaviour (Malena et al., 2004). These assumptions are problematic, as politically marginalized communities and weaker sections of a community, including women, are often unable to act on the information (assuming it is accessible) (Awortwi and Nuvunga, 2019; Garvey and Newell, 2005). Rather than a circular and reinforcing framework, Garvey and Newell's conceptualization of accountability as a web of relationships that pull in different and/or competing directions, is more apt for an analysis focused on EITI's impact at the local level (Garvey and Newell, 2005).

The growing literature on the local-level political, economic and socio-cultural dynamics in participating countries contributes to understanding why disclosure does not trigger the assumed social action. For information to be 'actionable', people need to feel 'empowered', understood as being in a position to influence decision-making that affects their lives (Awortwi and Nuvunga, 2019; Gaventa and Oswald, 2019). National and local-level dynamics in participating countries can disempower communities, already disadvantaged by more powerful actors such as global companies and political elites (Smith et al., 2012;

Tuokuu et al., 2018). In many communities affected by extraction, historic opposition to mining has been suppressed, serving to disempower communities, raising doubts about the motivation of government in stakeholder engagements (Smith et al., 2012). As Smith et al. (2012) found in Madagascar, broader power relationships can override efforts to engage with community stakeholders, while designated representatives of the MSG may be unable to effectively represent the varied interests within communities. Powerful actors, such as mining companies, can take advantage of uncoordinated efforts on the part of CSOs in communities, further impeding public accountability (Garvey and Newell, 2005; Smith et al., 2012).

The motives of CSOs sitting on EITI's national-level MSGs have frequently come into doubt, either because they are insufficiently engaged with local community concerns (Andrews, 2016; Klein 2017; Standing and Hilson, 2013), or are unrepresentative of all segments of a community (Aye, 2008; Smith et al., 2012). In the face of seemingly overwhelming evidence of little to no accountability to mining communities through EITI, what is the value of assessing variation in public awareness of EITI and information disclosures? Part of the reason relates to how broad societal categories, such as 'civil society', CSOs and 'communities' are conceptualized. Recognizing the complexity and diversity of civil society actors, including CSOs, as well as the diverse make-up of communities, opportunities for fostering accountability may arise. A second part of the reason relates to unpacking what EITI does, the different societal contexts that connect communities to EITI, and differences in how community members relate to EITI initiatives.

The concepts of 'civil society' and CSOs are insufficiently interrogated within the context of their role through EITI in promoting greater accountability (Blaikie, 2006; Oppong, 2017; Whitfield, 2003). Citing Whitfield (2003), civil society is not static or unified, but rather, a process of 'complex interactions of historically generated social structures, political issues, personal networks, material incentives, state resources and international linkages' (p. 379). The term civil society has been used by the World Bank in the context of its 'good governance' agenda, which has been carried over to the transparency and accountability agenda of EITI (Sefa-Nyarko et al., 2021; Whitfield, 2003). EITI has adopted the term in participating countries with differing socio-political and institutional contexts.<sup>2</sup> Understanding how different societal actors intersect with information disclosure at the community level raises the potential for variation in awareness that has not been uncovered.

CSOs similarly operate in diverse political contexts, have different goals and may or may not be in sync with government agendas (Whitfield, 2003). For example, in the context of mining, CSOs are as likely to challenge the government agenda of mineral extraction as they are to work in support of transparency and accountability (Oppong, 2017). In the case of Ghana, for example, the Third World Network (TWN) directly challenged the liberal economic reforms that led to the opening up of the extractive sector to foreign investment, spawning community grievances as a result of displacement and environmental harms (Whitfield, 2003). Furthermore, CSOs have different motives for participating in initiatives such as EITI, including to gain access to money from donors, but also to gain access to decision-making of those in positions of power within government (Oppong, 2017).

Similarly, the EITI simplifies how communities are understood, treating them as being physically bounded within a specific space, possessing a distinct social structure and set of shared norms (Blaikie, 2006). Communities rarely possess these characteristics, being made up of diverse groups that are differently affected by change, such as that brought about by the impacts of large-scale commercial mining. The point of finding variation is to suggest that EITI has 'standardized the local' and 'blackboxed' communities (Blaikie, 2006), overlooking local politics, inequalities and contestations over the distribution of resources,

including mineral royalties. Uncovering variation in awareness serves as a start to unpacking contingencies that influence the likelihood of accountability in mining communities.

Conceptions of CSOs can similarly be idealized, and while many advocate on behalf of communities, they nevertheless operate in a political context that shapes interests and motivations (Sefa-Nyarko et al., 2021; Whitfield, 2003). In Ghana, for example, CSOs such as the Wassana Amenfi Association of Communities Affected by Mining (WACAM), together with TWN-Ghana, agitated against mining from the late 1990s and viewed GHEITI as a ploy to diffuse opposition to mining (Oppong, 2017). However, Publish What You Pay (PWYP)-Ghana, the Ghanaian chapter of the global PWYP coalition of CSOs pushing for transparency and accountability in the extractive sector, saw value in joining Ghana's National Steering Committee (NSC), the Ghanaian version of the EITI MSG. By joining the NSC, PWYP-Ghana representatives felt that they could better gain access to insider knowledge and better influence decision-making (Oppong, 2017). Similar considerations led WACAM to later join GHEITI's NSC.

The literature on accountability mechanisms suggests that there are avenues to support citizen engagement where enabling conditions are absent (Fox, 2015). Examples of accountability mechanisms relevant to the utilization of mineral royalties include participatory budget and expenditure monitoring initiatives and educational campaigns on the government budget and expenditure process (Carlitz 2013). Ideally, civil society and the state need to work together for accountability mechanisms to be successful (Malena et al., 2004). Since ideal conditions are never present, a more constructive approach is to identify specific conditions that tend to make for more successful initiatives, recognizing that there might still be variation in the degree to which they 'work' (Fox 2015). Public institutions may not be responsive, yet opportunities for empowerment and accountability may occur at particular moments and in specific places (Gaventa and Oswald, 2019). Recognizing that a diversity of actors are differently affected by changes in civic space (Garvey and Newell, 2005), different entry points may be possible for interventions that enhance accountability (Hossain et al., 2018).

### 3. Methodology

To operationalize the research objectives, an exploratory approach was adopted to achieve a closer understanding of the nature and extent of variation across districts in levels of awareness of GHEITI (Stebbins, 2011). GHEITI was 'unpacked' to assess the level of awareness of its initiatives, including securing legal backing for the Minerals Development Fund (MDF), which receives 10% of mineral royalties, while 10% is disbursed to local government and chiefs in mining districts (Ofori and Lujala, 2015). With this in mind, respondents were asked the following questions: 1. awareness about: GHEITI, the MDF, the disbursement of royalty payments to the districts, and the payment by mining companies of royalties to central government, and 2. open-ended questions about the major issues and concerns respondents encounter, based on their roles and/or experiences. Data collection was supplemented with secondary literature, which involved a search of leading journals with a focus on natural resource governance to identify relevant scholarly articles, as well as government and EITI reports.

Of the ten districts in Ghana where large-scale commercial gold mining takes place, four were selected for the research. Together with considerations of the history of mining (the extent of large-scale commercial gold mining), the districts vary in terms of the duration of specific mining operations, and whether the districts had received visits by GHEITI. Variation in these indicators made it possible to consider whether or not they mattered in terms of levels of awareness. A further important criterion for selecting the four districts was access to the 'community consultation committees' (CCCs) set up by the mining companies as part of their community outreach strategies. Focus group meetings with the CCCs were necessary to assess whether community

<sup>2</sup> In the interest of consistency, this study employs the terms civil society and CSOs as they are used by EITI.

representatives, including farmers', women's and youth representatives, chiefs and local government officials, were aware of GHEITI and its activities.

The companies and districts visited include Asanko Gold (now Asanko Goldfields JV) in Amansie West, Kinross Gold Corporation, whose Chirano mine operations straddle the districts of Bibiani Ahwianso Bekwai (BAB – henceforth referred to as Bibiani) and Sefwi Wiawso, and Newmont Gold Corporation's Akyem mine in Birim North.<sup>3</sup> Chirano's CCC has community representatives from both Bibiani and Sefwi Wiawso. At the time of the field research (February and July, 2018), GHEITI had visited Bibiani and Birim North, in the past five years, while there had been no visits to Sefwi Wiawso and Amansie West. Table 1 provides information on the districts according to the above characteristics.

Field research consisted of focus group meetings with senior district officials, assembly members, and CCC members. 'Street-level surveys' of randomly selected residents approached in the mining areas of the four districts were conducted between 2-8 September, 2018. These were structured interviews (using a paper and pencil survey format), conducted by graduate students, totaling ninety-two persons. Two communities from Bibiani and one from Sefwi Wiawso were surveyed in the vicinity of Chirano. The communities visited are within the 'catchment areas' of the mines, a term that is defined by the mining companies and does not necessarily reflect the boundaries of towns or the traditional areas of chiefs.

Semi-structured interviews were held with GHEITI officials and CSO representatives in February, 2018, with a virtual follow-up meeting with a CSO representative in August 2021. While a different composition of CCC members, district officials or community members at a different time might have led to different findings, since the primary objective of the research was to establish whether there is variation in the levels of awareness, this was deemed acceptable.

#### 4. Findings: Unearthing variation in awareness in mining communities

The findings reveal variation both across and within the districts on levels of awareness of GHEITI and its related activities. The variation in awareness *within* each district is suggestive of two factors: 1. one's position of authority within the district, such as government official or chief and 2. one's spatial relationship to the information, which influences what is useful to know. Drawing on Garvey and Newell's (2005) conceptualisation of accountability mechanisms and Awortwi and Nuvunga's (2019) concept of 'actionability', the variation in awareness *between* districts points to the possible role of factors that influence

**Table 1**  
District Characteristics

District	Amansie West	Birim North	Bibiani-Ahwianso-Bekwai	Sefwi Wiawso
Region	Ashanti	Eastern	Western	Western
Mining Company/years in operation	Asanko Gold - Obotan/3 years	Newmont - Akyem/6 years	Kinross Gold - Chirano/14 years	Kinross Gold - Chirano/14 years
History of mining in District	Limited (Extensive in region)	Limited	Extensive	Extensive
Visited by GHEITI	NO	YES - 2017	YES - 2013	NO

<sup>3</sup> Kinross Gold Corp. signed a deal to sell its 90% stake in the Chirano mine to Asante Gold Corp. on April 25, 2022. Newmont's CCC is called a Social Responsibility Forum, but is referred to here as a CCC for ease of reference.

whether information is *actionable* (whether one is in a position to use the information) and the ability to influence decision-making that affects peoples' lives. In the absence of such influence, accountability for marginalized groups depends on access to those in government or CSOs who perform *representation functions*. The presentation of the findings is organized around the distinctions provided above.

#### 4.1. Awareness within Districts of GHEITI, MDF and Royalty Disbursements

##### 4.1.1. Position of authority-inclusion

The research confirmed that there is variation between different actors in the level of awareness of GHEITI within each district. In focus group sessions with local government officials, senior district officials showed the greatest awareness of GHEITI, while assembly members were significantly less aware of GHEITI. The chiefs who participated in focus group sessions with assembly members also demonstrated high levels of awareness about the existence of GHEITI. The one exception is Amansie West, where none of the chiefs at the focus group sessions with assembly members and at Asanko's CCC had heard of GHEITI (Focus groups: Amansie West, February, 2018).

With the exception of Birim North, community representatives on the mining companies' CCCs were unaware of the existence of GHEITI. The street-level surveys show that, with the exception of Amansie West, where none of the respondents were aware of GHEITI, a small percentage of respondents (ranging from 5-14 per cent) had heard of GHEITI.

##### 4.1.2. Spatial relationship to information-accessibility/relevance

The findings confirm the importance of deconstructing GHEITI in terms of the level of awareness of its activities, if not its existence. For example, many respondents in the focus groups with assembly members and CCCs were aware of the Minerals Development Fund (MDF), and most were aware that royalties are disbursed to the districts. All respondents were aware that mining companies in their area pay royalties to central government, including the majority of respondents to the street level surveys. Most community members were also aware that payments come back to the districts, suggesting that the closer respondents are to the 'ground', the information they are likely to find most relevant is about what actually reaches the communities in the mining areas.

The problem is that available information on transfers to districts is inaccessible, and even assembly members find it difficult to access and comprehend the information (Focus Groups: District Assemblies, 16 February and 3-4 July, 2018). Decisions on budgets *and* expenditures using royalty disbursements are typically the purview of senior district officials (Ayee, 1996, 2008). Although a major goal of local government is popular participation in development planning, senior district officials dominate the budget process (Ayee, 1996, 2008; Debrah 2009).

Respondents from focus group sessions with assembly members and the CCCs, as well as the street level surveys, all confirmed there is little if any awareness of how royalties are spent, once they reach the district. The limited accountability on expenditures of mineral royalties in the districts point to the importance of peoples' positions within local government and the communities to their awareness of GHEITI and activities related to the disbursement of royalty payments. There is currently no formal mechanism in place within GHEITI requiring district governments to disclose *expenditures* of mineral royalties. In the absence of such information, there can be no accountability.

Table 2 summarises the information discussed above.

#### 4.2. Variation of Awareness between Districts of GHEITI, MDF and Royalty Disbursements

##### 4.2.1. History of mining and duration of mining companies' operations

Although the findings on levels of awareness were broadly similar

**Table 2**  
Awareness of Existence of GHEITI/MDF/Disbursements to districts/Royalties paid by companies

Actors	GHEITI	MDF	DISBURSEMENTS	ROYALTIES
Communities CCCs (mining companies)	low Low (except Newmont/ Birim North)	medium high	high high	high high
Chiefs	High (except Asanko/ Amansie West)	high	high	High (receive payment directly)
Senior district officials	high	high	High (set budgets and decide on expenditures)	High
Assembly members	low	High (except Sefwi Wiawso)	high	high

across the districts, respondents in Amansie West stood out for being less aware of GHEITI, while those in Birim North displayed higher levels of awareness. Factors identified in Table 1, such as the history or intensity of mining and the length of a company's operations, do not appear to influence the general pattern. However, the research revealed that there is some variation in the levels of awareness across the districts that could be attributed to factors such as the history of mining and duration of mining companies' operations.

In Amansie West, the lack of awareness of GHEITI on the part of chiefs is likely because Asanko had only recently transitioned from an exploration company to an operating mine (production began in April 2016). Senior district officials were also unaware of GHEITI, in contrast to the other districts, but they and the chiefs were aware of royalty payments (Focus Group: Amansie West, 16 February, 2018). The lack of awareness about GHEITI may be attributable to the fact that although Amansie West is located in the mining intensive Ashanti region, the district is not in an area where there has been extensive mining.

Despite these differences, there was widespread awareness of the MDF across all the districts, including Amansie West, on the part of senior district officials, chiefs, and assembly members (Focus groups: February/July, 2018). The one exception was Sefwi Wiawso, where only one-quarter of assembly members were aware of the MDF, whereas the majority of assembly members in Bibiani were aware. Since both districts are located in the mining intensive Western region, history of mining does not appear to explain the difference in awareness.

These findings confound simple correlations between differences in the history of mining and levels of awareness. Rather, they suggest that overall, one's position of authority is a stronger predictor of awareness of GHEITI and the MDF. When one considers that senior district officials dominate the budget process, they, together with assembly members, would have a crucial role to play in disseminating information about royalty revenues and expenditures. Thus, while it may justifiably be argued that awareness does not translate automatically into accountability, awareness is the crucial first step toward accountability to mining communities.

#### 4.2.2. Actionable information: whether local government is responsive to community interests/concerns

The street level surveys in mining communities across the districts showed that most respondents are aware that the mining companies pay royalties to central government, and the majority know that some of this money comes back to the district and chiefs. However, when asked whether they know how government spends the royalties, virtually all respondents did not know. In Amansie West, for example, common responses were that "the district assembly has totally neglected them" and that "complaints and issues sent to the district regarding their plight as a

mining community had fallen on deaf ears" (Street level survey, Amansie West, September 2018). Asked if they were aware of any development projects undertaken in their area sponsored by local government, none of the respondents to the surveys in any of the districts could identify a project (such as a school, clinic, road, etc.) (Street-level surveys: All districts, September 2018).

The responses from Amansie West suggest that in their case, the problem was not so much that people were unable to access district officials, but rather that officials were not responsive to their concerns. These findings point to the need to distinguish between whether community members look to assembly members for answers, and whether assembly members are responsive to community concerns. The lack of responsiveness is part of the broader problem where district governments fail to consult with communities on development projects (Antwi-Boasiako, 2010; Ayee, 2008). The limited opportunities for grassroots input on development planning undermines accountability and can lead to a loss of faith in the ability of district officials to address peoples' needs (Antwi-Boasiako, 2010; Ayee, 2008). Senior district officials were also found to not adequately consult with assembly members on the budget process, who in turn would not be in a position to consult with communities on development planning (Focus groups, Assembly Members, all districts: February and July, 2018).

Chiefs do represent the interests of communities in their traditional areas, by mediating conflict, for example, but they have a great deal of discretion as to how they spend their share of royalty payments. Much is spent on maintaining the 'status of the stool', in accordance with the 1992 Constitution (Government of Ghana, 1992), which is open to interpretation (Personal Communication, CSO Representative: 26 February, 2018). Street level surveys revealed the perception that, with some exceptions, chiefs have mostly spent their payments on visible status symbols, such as 'big-big cars' and 'palaces' (Street-level surveys: All districts, September 2018). When chiefs are not investing their share of royalties in communities, tradition militates against people holding them to account. Powerful chiefs have resisted calls for increased accountability through the disclosure of royalty payments to them (Standing and Hilson, 2013).

Neither senior district officials or chiefs are incentivised to disclose their expenditures of royalty payments. In the absence of adequate representation of mining communities' interests, what limited information is available to communities is not actionable.

#### 4.2.3. Representation: whether governments/CSOs speak on behalf of communities

Accountability mechanisms mobilize communities to raise awareness about relevant information and empower them to demand accountability. The research findings suggest that both government (through GHEITI's NSC) and CSOs have been effective in some instances in raising awareness about royalty payments and how they are spent. These factors appear to have combined to explain the higher levels of awareness in Birim North uncovered in the findings.

On the government side, members of GHEITI's NSC have engaged in outreach through their sensitization exercises in select districts. When NSC members visit mining areas as part of their information dissemination activities, it facilitates the attendance of community members by convening town hall meetings. Recognizing the importance of information on district expenditures of royalties in addition to revenues, GHEITI asks district officials to reveal district budgets and expenditures (Personal communication: GHEITI official, Accra, 26 February, 2018). This makes GHEITI's outreach campaigns a key accountability mechanism.

On occasion, news of how the district has spent royalties has led to animated debate and calls for greater accountability. For example, at a 2013 townhall meeting organized by GHEITI in Obuasi Municipal (Ashanti region), government officials claimed that a wall had been built around a school. Community members were incensed, as no such wall had been built, and demanded to know what became of the funds

(Personal communication: GHEITI official, Accra, 26 February, 2018). By ensuring that this information is shared with communities, people are in a better position to obtain information that they need to know in order to hold local government accountable. While GHEITI's outreach would not have changed the underlying dynamics of poor accountability to mining communities, the anger of community members suggests that there is a strong appetite for obtaining information on local government expenditures. It can reasonably be inferred that there is value in attempts to disclose information on district expenditures to communities.

Of the four districts studied, Birim North and Bibiani had recently received visits from GHEITI at the time of the research. Birim North is not in a major mining area, and the Akyem mine had only been operating for six years (at the time of the field visit) Yet, fully 18 per cent of those present at the focus group session with the CCC had heard of GHEITI (Focus Group: CCC, 27 February, 2018), compared with none of the CCC members in the other districts. Since GHEITI officials had recently visited Birim North (in 2017, just one year prior to the field visit) it may be surmised that GHEITI was still fresh in peoples' minds.

By contrast, in Bibiani, none of the CCC members had heard of GHEITI, despite the visit by GHEITI officials in 2013. Perhaps the passage of time since the field visit (5 years) was a factor, or turn-over in the membership of Chirano's CCC. It is also possible, however, that in the case of Birim North, the presence of the local committee member of PWYP- Ghana at the CCC session explains the greater awareness of GHEITI.

The PWYP representative was clearly very active in the community, with a list of concrete recommendations for GHEITI that he presented at the CCC session (Focus Group: CCC, 27 February 2018). The findings from Birim North suggest that a recent visit by GHEITI and the active role of the local PWYP representative are relevant to the heightened levels of awareness. This finding is confirmed by a recent EITI report on Ghana that attests to the importance of locally engaged CSOs in sharing information on royalty payments and expenditures by local government (in this case, in Obuasi Municipal) (EITI, 2020).

While one might expect that there would be CSOs operating in the other districts, the street level surveys suggest they were not present in the mining communities at the time of the research. While this does not rule out the presence of CSOs, if they were operating in the districts, they had not made their presence known to mining communities, as none of the respondents to the street-level surveys were able to identify any CSOs working on their behalf (Street-level surveys, all districts, September 2018).

One final point is the surprising lack of awareness about GHEITI on the part of members of the company CCCs, with the exception of Birim North (focus groups, all CCCs, February/July, 2018). This finding was unexpected, because mining companies support GHEITI, as it draws attention to the fact that companies are paying royalties to government. This is significant because the community representatives on the CCCs could be getting the information out that their local government is receiving royalty payments from the company, which should be coming back to the mining areas. The local government officials and chiefs could be sharing information at CCC meetings on how royalty payments are being allocated, but this is not happening, blocking one potential avenue to accountability to mining communities. This example highlights what one youth representative referred to as a 'communication gap' between those tasked with sharing information and those meant to receive it (Personal communication: CCC youth representative, 15 February, 2018).

## 5. Discussion: Implications of Findings

The research findings confirm that there is variation in levels of awareness within and between districts on GHEITI and the royalty disbursement process. The findings represent an important start to understanding what influences whether information is available and is useful. A general pattern was established where one's place within the

resource extraction/royalty disbursement/local governance space influences the nature of awareness. The widespread awareness on the part of community members of royalty payments by companies and their disbursement back to the districts points to the importance of spatial location to the relevance of information. The research revealed the need to account for the different levels and types of awareness present within and across districts. The findings suggest the potential of accountability mechanisms, through representation by both government and CSOs, in bringing relevant information to marginalized community members who lack effective representation and the ability to influence decision-making.

Although the findings confirm the literature on the overall lack of awareness of GHEITI in the districts (Aarons, 2011; Rustad et al., 2017), they also revealed that most people are aware that districts receive royalty payments. The findings support our argument on the need to 'unpack' the royalty disbursement process in assessing awareness of GHEITI. There is variation *within* districts in terms of awareness of GHEITI and access to information about what happens to mineral royalties. The finding of variation between and within districts is significant, as it validates the need to look for contingencies at the local level in assessing GHEITI's (and EITI's) impact (Garvey and Newell, 2005).

In keeping with the literature, the findings suggest that power dynamics are highly relevant in terms of who gets access to information, and whether that information is actionable (Awortwi and Nuvunga, 2019; Smith et al., 2012). Mining communities are physically distant from district capitals, and separated as well by their socio-economic status and vulnerability (Awortwi and Nuvunga, 2019; Garvey and Newell, 2005; Hilson and Maconachie, 2009; Smith et al., 2012). While senior district officials had the most access to information, the findings confirm that those who possess the information are not disseminating it widely within the districts.

The findings on variation in awareness further confirm the literature that points to the importance of both CSO-led and government-led approaches to improved accountability (in this case) to mining communities (Malena et al., 2004). GHEITI officials appear to have played a role in raising awareness in Birim North through their dissemination exercises and consultation with communities. The earlier example of GHEITI's visit to Obuasi in 2013 further demonstrates the effectiveness of community outreach through the provision of information that is relevant to their lives. GHEITI's dissemination exercises reveal that people have a strong interest in learning how district revenues from royalty payments are being spent (expenditure transparency), as much as the amounts districts are receiving (revenue transparency). These government-led GHEITI initiatives have the further advantage of compensating for local level political and power dynamics that may discourage or disincentivize local government officials from widely sharing information on district expenditures (Aye, 1996, 2008; King et al., 2013).

These instances of accountability mechanisms through GHEITI representation of community interests confirms the literature on the potential of opportunities for accountability at specific times under certain conditions (Fox, 2015; Gaventa and Oswald, 2019; Hossein et al., 2018). However, GHEITI's NSC is geographically too far removed from mining communities to generate the sustained representation that might enable successful demands for accountability, highlighting the problem that CSOs that claim to speak for communities may be too far removed from the ground (Oppong 2017). Furthermore, while the research found instances of effective accountability mechanisms, one-off visits, and the lack of resources to reach all districts, inhibit GHEITI's impact.

Although CSOs on GHEITI's NSC may not all be directly representative of communities (Klein, 2017; Oppong, 2017), the findings suggest that greater nuance is required in thinking about their role. CSOs based in Accra may not be immersed in the communities, but can work on behalf of their interests indirectly by pushing for broader reforms of concern to communities (Personal communication - virtual, CSO

representative, 4 August, 2021). The NSC's efforts to secure legal backing for the MDF (2016) is an example of this sort of advocacy by making transfers of royalty payments to districts a legal requirement of government (Government of Ghana, 2016). It remains important that CSOs also be engrained within the communities, as demonstrated in Birim North, where the PWYP representative played a supportive role in raising awareness.

Unfortunately, insufficient resources are being allocated by central government to the GHEITI Secretariat, hindering its ability to reach all districts (Personal communication: Official, GHEITI Secretariat: 9 February 2018). As a result, GHEITI officials target the larger mining areas, which would explain why Amansie West was overlooked for dissemination activities. This suggests that the potential role of enabling conditions in instances of time and different places (Fox, 2015; Gaventa and Oswald, 2019) needs to be tempered by the problem that such efforts at representation may not be sustainable, thereby curtailing their potential to have a lasting impact. The broader political and institutional context that impedes adequate voice and representation of vulnerable communities (Smith et al., 2012), validates the literature that confirms the need for both government and CSO-led accountability mechanisms to enable communities to mobilize around information, thereby making it 'actionable' (Awortwi & Nuvunga, 2019; Malena et al., 2004).

Although the purpose of the research was to focus on political accountability, it did uncover the potential role of the private sector in enhancing awareness of GHEITI and royalty payments to the districts. In Birim North, Newmont regularly posts its royalty payments on the town hall billboard, as well as on social media (Focus Group, Newmont CCC, 27 February, 2018), which might serve as an accountability mechanism for the benefit of the broader community. Since Newmont makes this information widely available, one cannot rule out the possibility that the greater awareness of GHEITI, the MDF and royalty disbursements in Newmont's CCC was partly a result of the company disseminating that information at meetings. The PWYP representative would also have been invited to join the CCC. Although self-interested, this is an instance where the postings offer another means for communities to learn the amounts of Newmont's royalty payments. Given the lack of incentive on the part of district officials and chiefs to disclose royalty expenditures, this creates an additional opportunity for relevant information to reach community members.

## 6. Conclusion

This paper contributes to the literature on GHEITI/EITI in a number of ways. First, the research establishes variation in awareness of GHEITI and its initiatives, confirming the need to deconstruct GHEITI as part of the research methodology. By deconstructing the royalty disbursement process into its component parts, the field research uncovered a more nuanced picture of the nature and extent of awareness of GHEITI, the MDF, and the disbursement of royalty payments to the districts. Second, the conceptual frame, drawing on responsiveness to, and representation of, marginalised community members, together with the degree to which information is actionable, served to anchor the exploratory research, enabling the identification of patterns of variation in the levels of awareness. This preliminary conceptual approach lays the groundwork for future theorizing on how and why variation in awareness might occur. The research was able to relate the position of various actors within local governance to their level of awareness about GHEITI and the royalty disbursement process, as well as how power imbalances influence who has access to information on royalty payments and expenditures, and whether relevant actors are sharing information.

Third, the findings suggest that government/GHEITI and CSO accountability mechanisms are associated with greater awareness of GHEITI and the royalty payments process. Direct interventions by the state through GHEITI activities facilitated greater awareness of its existence and CSO representatives can be effective in sharing relevant information. Ultimately, both state and CSO interventions would

enhance the ability to get the right information to community members, and the research shows companies are incentivised to disclose royalty payments directly to communities.

To address the information asymmetries identified in the research, various communications modalities could be targeted to community members to raise awareness about the amount of royalty payments to district governments and chiefs. For example, youth can access such information through mobile phones and social media, while radio announcements in the local language would more likely reach older community members. Donors should provide funding to the global EITI that would be directed to participating countries with established accountability mechanisms in place, to ensure that cost is not a barrier to initiatives such as GHEITI's outreach to mining areas. To bridge the gap between raised awareness and accountability, strategies to improve the capability of communities to use the information should be employed to serve as a counterweight to those in power. Outreach would need to expand upon GHEITI's dissemination exercises by targeting various groups within the communities, such as market women, youth groups and farmers' associations. Strategies could include town hall meetings and the appointment of information ambassadors to work with GHEITI and CSOs to foster the 'accountability capabilities' of community members, understood as the ability to use information for the empowerment of communities. Such representatives could support already existing procedures for consultation with communities on budgeting of development projects as part of the broader medium-term development planning processes. Mining company CCCs can be supportive of awareness raising, but CSOs, working with GHEITI officials, can strengthen community capabilities by organising within existing community associations. With information more widely available on both royalty revenues and expenditures, district officials might be incentivised to consult more widely on budgeting processes supportive of community development.

These recommendations are in keeping with the research findings, which supports the literature that highlights the potential of targeted accountability mechanisms in raising awareness - a promising entry point into enhancing accountability to mining communities. Further research is needed on whether and how targeted interventions to increase awareness might contribute to enabling conditions for enhanced accountability to mining communities.

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## Declaration of Interest Statement

None.

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