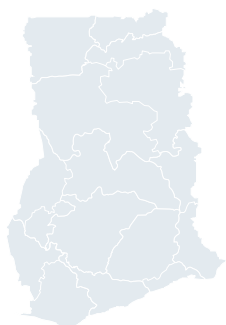




Fisheries
Transparency
Initiative

TAKING STOCK

Online Transparency of Fisheries
Management Information



Republic
of Ghana

In cooperation with:



2023 Summary Assessment Report

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Design: weeks.de Werbeagentur GmbH



This 'TAKING STOCK: Online Transparency of Fisheries Management Information' assessment for the Republic of Ghana (2023) has been funded by the Bloomberg Philanthropies Ocean Initiative.

Every effort has been made to verify the accuracy of the information contained in this assessment. All information was believed to be correct as of March 2023. Nevertheless, the Fisheries Transparency Initiative (FiTI) cannot accept responsibility for the consequences resulting from the use of this assessment or its contents by others.

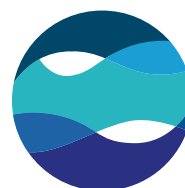
Furthermore, in conducting this assessment, the FiTI did not investigate the veracity or completeness of the published information and did not make any judgement about the integrity of the information or practices disclosed.

We would like to thank all the individuals and institutions who contributed to the various stages of research and preparation of this assessment.

The Fisheries Transparency Initiative (FiTI) is a global multi-stakeholder partnership that strengthens transparency and collaboration in marine fisheries management.

By making fisheries management more transparent and inclusive, the FiTI promotes informed public debates on fisheries policies and supports the long-term contribution of the sector to national economies and the well-being of citizens and businesses that depend on a healthy marine environment.

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Initiative

TAKING STOCK: Online Transparency of Fisheries

Management Information assesses the level of information that national authorities in Ghana publish on government websites regarding the country's marine fisheries sector.



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The 2023 Ghana **TAKING STOCK: Online Transparency of Fisheries Management Information** assessment consists of this Summary Assessment Report, as well as an in-depth Detailed Assessment Report.

Both reports, as well as information on the methodology, can be found at:
www.fiti.global/taking-stock



SUSTAINABLE FISHERIES NEED TRANSPARENCY

For millennia, those who dedicated themselves to fishing, whether for food, income or recreation, did not need to worry about the sustainable management of this natural resource. Fish stocks replenished themselves with ease. **This is no longer the case.** The ocean is under increasing threats from myriad impacts, like climate change, pollution, and overfishing.

Governments have the fundamental obligation to manage common resources, such as fish, on behalf of their citizens. But this invokes a complex challenge: to ensure that fishing and fish trade contribute to income, employment, food and nutrition for millions of people, while conserving marine biodiversity for present and future generations.

Public availability of information is critical to achieving sustainable fisheries. Yet, transparency in fisheries management has not been a priority. Many governments do not disclose basic information on their fisheries sectors, such as laws, permits, fishing agreements, stock assessments, financial contributions, catch data and subsidies. Additionally, there are widespread concerns that companies are not consistently reporting accurate information on catches, fishing practices and payments to governments. The data that is already publicly available is too often incomplete, outdated, unverified, or not readily accessible.



“Lack of basic transparency could be seen as an underlying facilitator of all the negative aspects of the global fisheries sector – IUU fishing, fleet overcapacity, overfishing, ill-directed subsidies, corruption, poor fisheries management decisions, etc. A more transparent sector would place a spotlight on such activities whenever they occur, making it harder for perpetrators to hide behind the current veil of secrecy and requiring immediate action to be taken to correct the wrong.”

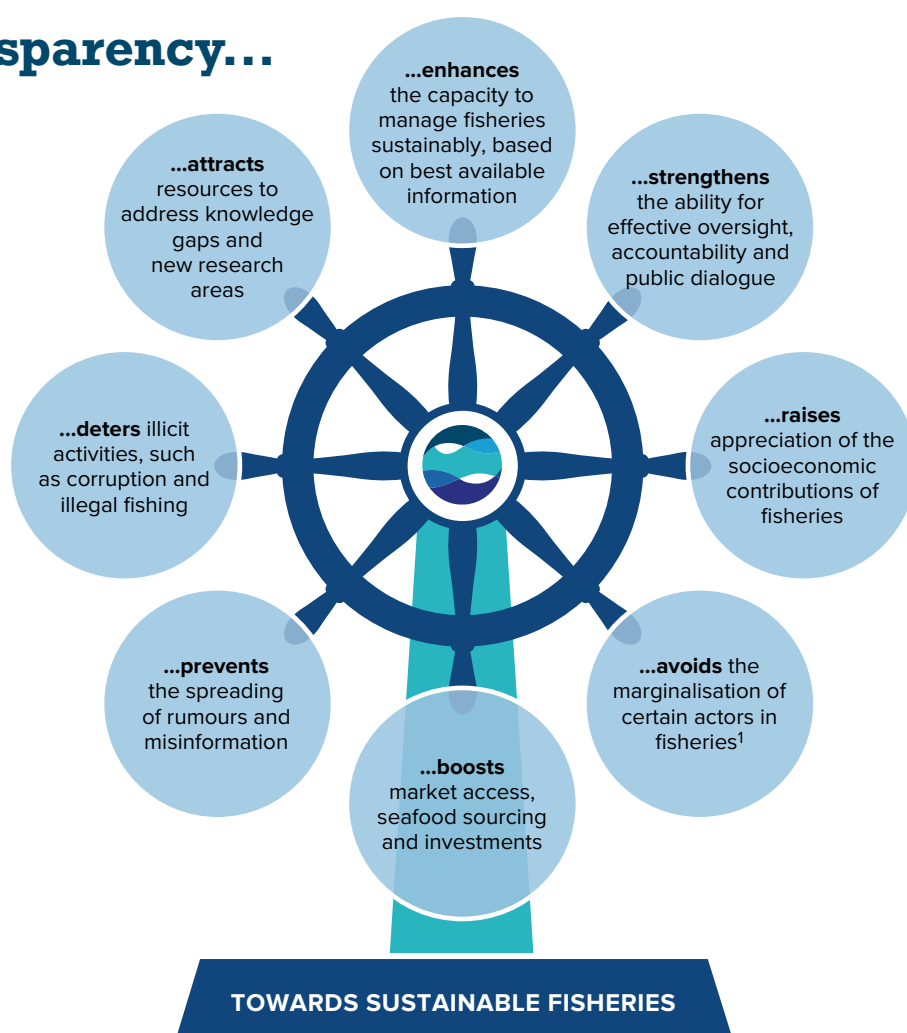
Food and Agriculture Organization of the United Nations (FAO)
The State of World Fisheries and Aquaculture 2010



Enhancing transparency in fisheries management appeals to all stakeholders that appreciate the enormous value of marine fisheries – whether that relates to food and nutrition security, employment, the value to national economies, or the cultural importance of fishing.

Transparency in fisheries management yields multiple benefits, and their relevance and applicability vary depending on the national context.

Transparency...



Promoting these positive features of fisheries lies at the heart of the Fisheries Transparency Initiative (FiTI).



Fisheries
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¹ In particular small-scale fisheries and women.

Transparency is not voluntary. It is a government's duty and a citizen's right!

The provision of accessible, timely and credible information on a country's marine fisheries is increasingly becoming a **legal requirement for governments**, stemming, among other things, from Freedom of Information laws. Such laws are frequently based on three key principles: *public participation*, *access to justice* and *access to information*. The last of these principles implies that the public should be able to obtain environmental information (including information about their country's fisheries sector) with only limited, explicitly defined exceptions arising from justifiable confidentiality claims and security matters.



Ghana's constitution, formalised in 1992, recognises the right of all citizens to have access to information (Art. 21(1) F). Having developed a draft Bill on Access to Information in 1999, it was not until 2019 that this Bill was passed into law, known as the '**Right to Information (RTI) Act**'.²

This Act lists obligations for the government to ensure transparency and the establishment of a **Right To Information Commission**, which was formally created in 2021.³ Although the RTI Act is seen as an important achievement to advance transparency, it contains some limitations, including on the obligations for public authorities to proactively publish information in digital format.

- Ghana joined the **Open Government Partnership (OGP)**⁴ in 2011 and is currently implementing 14 commitments from its 4th National Action Plan.
- Ghana joined the **Extractive Industries Transparency Initiative (EITI)**⁵ in 2007, which is recognised as the global standard for good governance of oil, gas and mineral resources.
- As of today (March 2023) the Ghanaian government has not committed to join the **Fisheries Transparency Initiative (FiTI)**, despite the importance of marine fisheries for the country.



The importance of public access to government information is also emphasised in the UN Sustainable Development Goals (SDGs). Target 16.10 of the SDGs calls on all states to adopt legislation or policies guaranteeing the right to information, which is essential not only for the achievement of Goal 16, but is an enabler to achieving other SDGs.

² Available at Ghana Legal Library Services: <http://elibrary.jsq.gov.gh>

³ <https://rtic.gov.gh>

⁴ <https://www.opengovpartnership.org/members/ghana/>













⁵ <https://eiti.org/countries/ghana>

ABOUT THIS ASSESSMENT

This is the first time that Ghana has been assessed regarding the online transparency of its marine fisheries sector.

This TAKING STOCK assessment covers 12 thematic areas of fisheries management, as defined by the FiTI Standard.⁶

The **FiTI Standard** is the only internationally recognised framework that defines what information on fisheries management should be published online by national authorities. The FiTI Standard was developed over two years in a global multi-stakeholder endeavour. Its objective is to contribute to the sustainability of marine fisheries by increasing the accessibility and credibility of national fisheries management information.

- | | | | | | |
|----|---|---|-----|--|------------------------------------|
| #1 |  | Fisheries Laws, Regulations and Official Policy Documents | #7 |  | Post-Harvest Sector and Fish Trade |
| #2 |  | Fisheries Tenure Arrangements | #8 |  | Fisheries Law Enforcement |
| #3 |  | Foreign Fishing Access Agreements | #9 |  | Labour Standards |
| #4 |  | The State of the Fisheries Resources | #10 |  | Fisheries Subsidies |
| #5 |  | Large-Scale Fisheries | #11 |  | Official Development Assistance |
| #6 |  | Small-Scale Fisheries | #12 |  | Beneficial Ownership |

For this assessment, these 12 thematic areas have been broken down into a total of **39 transparency elements**.⁷

⁶ <https://www.fiti.global/fiti-standard>

⁷ An overview of these 39 transparency elements can be found in the section '[Key findings](#)'.

This assessment evaluates whether basic information on Ghana's marine fisheries sector is **freely available** on government websites, whether it is **up to date** and whether it is **easy to find**.⁸



Additionally, this assessment:

- Considers whether information is published in a way that renders it easy to **(re)use**, e.g. to download, search and filter;
- Documents instances of **'good transparency practices'**, where published information allows non-experts to draw reliable conclusions;⁹ and
- Proposes practical **recommendations** to improve online transparency around Ghana's marine fisheries sector.



**REPUBLIC
OF GHANA**

This assessment is intended to support national authorities in Ghana to improve transparency in fisheries management and to stimulate interest in fisheries among a wide range of stakeholders.

It also establishes a comprehensive benchmark for evaluating progress over time.



⁸ For more information about the assessment's methodology, please refer to <https://www.fiti.global/taking-stock/methodology>.

⁹ For example, national authorities may utilise innovative techniques to help visualise information, such as online information systems or fact sheets.



Public disclosure of information cannot be directly equated with actual progress towards sustainable fisheries management.

A lack of transparency in fisheries management is not always a deliberate state of affairs. Governments with poor levels of transparency are often viewed negatively, as if driven by the desire to hide information from public scrutiny. However, what may be perceived as opacity or secretive practices is often the result of other factors, such as the complexity of the fisheries sector, a lack of technology, expertise and staff, or legal concerns. Some government ministries or national agencies, particularly those that are underfunded, may not prioritise transparency. Unfortunately, these arguments can also be used as a convenient excuse to avoid scrutiny.

A low level of transparency in this TAKING STOCK assessment may not be a sign of wrongdoing, but rather highlights an opportunity for national authorities to enhance disclosure to stakeholders. Likewise, a high level illustrates strong disclosure systems, but this may not reflect operational success regarding the sustainable management of marine fisheries.

Transparency should also not be misinterpreted as a direct indicator for ethical behaviour, such as honesty and integrity.

This assessment is therefore not an end in itself. Instead, it takes stock of current disclosure practices against an internationally recognised transparency framework – the FiTI Standard – with a view to starting a conversation with all relevant stakeholders in the marine fisheries sector of Ghana.

The ambition is that this and future **TAKING STOCK** assessments will contribute to making government transparency the global norm in fisheries management.

CONTEXTUAL INFORMATION ON MARINE FISHERIES IN GHANA



Recent developments relevant to Ghana's marine fisheries sector:



At the 2023 Our Ocean Conference in Panama, the government of Ghana committed that by 2025 all Ghanaian industrial vessels will be equipped with electronic monitoring systems (EMS).



In 2022, the Ministry of Fisheries and Aquaculture Development (MoFAD) published on its website, for the first time, a list of licensed fishing vessels. However, the list covered only six months of the year and more recent information has yet to be published.

Furthermore, in 2022 the MoFAD issued a gear directive for trawlers to modify their trawl gear to minimize the harvest of non-target species/bycatch. As of 1 March 2023, only 25 of the 76 trawlers have complied and were able to obtain a license to fish.



The Fisheries Management Operational Committee (FMOC) was formally inaugurated on 17 March 2023. The FMOC is part of the institutional structures for implementing Ghana's new Fisheries Management Plan.

¹⁰ Source: Ministry of Fisheries and Aquaculture Development (2022), National Fisheries Management Plan, Government of Ghana

¹¹ Source: Ibid.

¹² Under the United Nations Sustainable Development Goal 14.5, countries (including Ghana) committed to conserve at least 10 per cent of their coastal and marine areas, consistent with national and international law and based on the best available scientific information.



**REPUBLIC
OF GHANA**

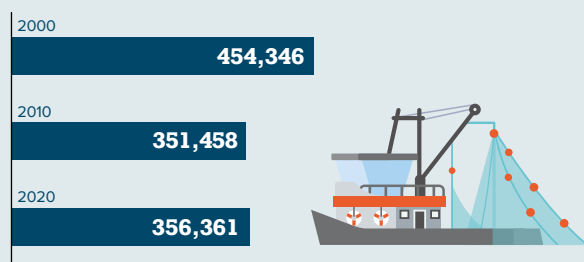
The marine fisheries sector in Ghana plays an important role in fulfilling the economic, employment, food security, and nutrition needs of its citizens.¹³

CONTEXTUAL INFORMATION



Capture fisheries production

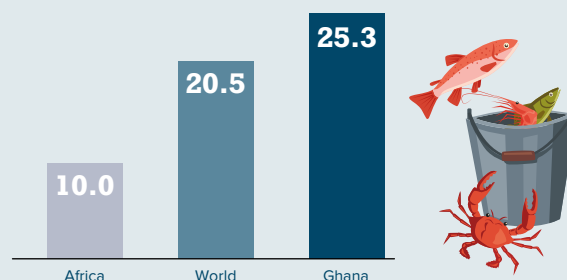
(tonnes, live weight)



Source: FAO Fishery and Aquaculture Country Profiles - Ghana

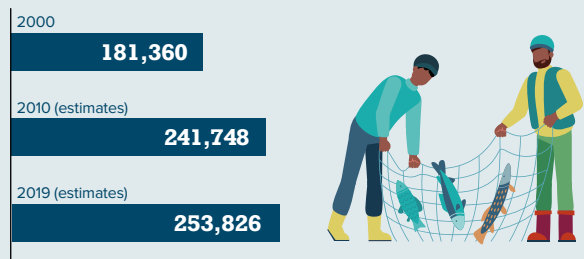
Fish available for consumption

kg/per capita



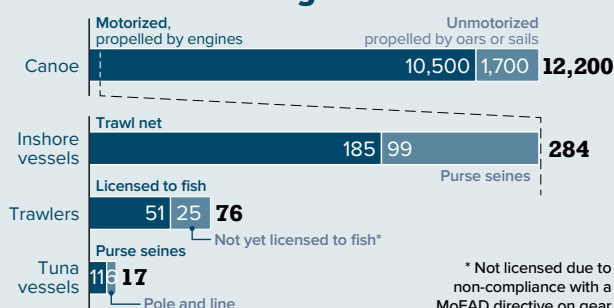
Source: FAO State of World Fisheries and Aquaculture 2022, FAO GLOBEFISH Market Profile – Ghana 2019

Number of fishers



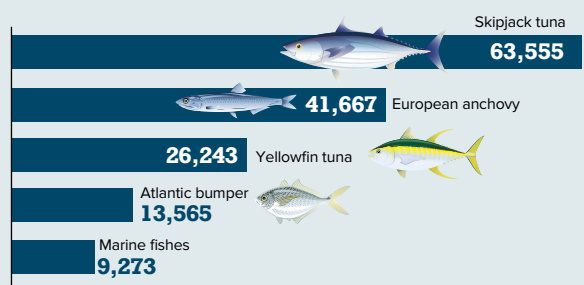
Source: FAO Fishery and Aquaculture Statistics 2019 (published in 2021)

Number of fishing vessels



Source: Fisheries Commission of Ghana (as of 23 March 2023)

Top 5 marine species



Source: FAO GLOBEFISH Market Profile - Ghana 2019 (in tonnes, by production volume)

Export of fish and fish products

Ghana is the **7th largest exporter** of fishery commodities in Africa, after Morocco, Mauritania, Namibia, South Africa, Senegal, Seychelles.



Source: FAO Fishery and Aquaculture Statistics 2019 (published in 2021)

¹³ This information reflects mostly international statistics (e.g. from the United Nations FAO), which in some cases may differ from national statistics. In addition, this report does not state the contribution of Ghana's fisheries sector to the national Gross Domestic Product (GDP). Although this is a common way of expressing the economic value of fisheries, GDP is not sufficient for fully representing the overall social, economic and environmental costs and benefits of the sector.

KEY FINDINGS

PUBLIC ACCESS TO FISHERIES INFORMATION



REPUBLIC OF GHANA

KEY FINDINGS
Public access to fisheries information



Ghana's national authorities collate and produce significant information about the country's fisheries sector. The country is therefore not data deficient. However, our assessment shows the need for national authorities in Ghana to improve public access to fisheries management information. The majority of information is not publicly accessible, and the quality of what is available online can often be improved.



For only **9 out of 34** applicable transparency elements, Ghana's national authorities publish information online ('Public Access'), and with varying quality.



For **20** transparency elements there is no information published.



For **5** transparency elements no information has yet been produced by Ghanaian national authorities.

Strong public access

Information for only 1 transparency element is **available online, up to date and easy to find**.

Not produced

Information for 5 transparency elements has **not yet been collected or compiled**.

Moderate public access

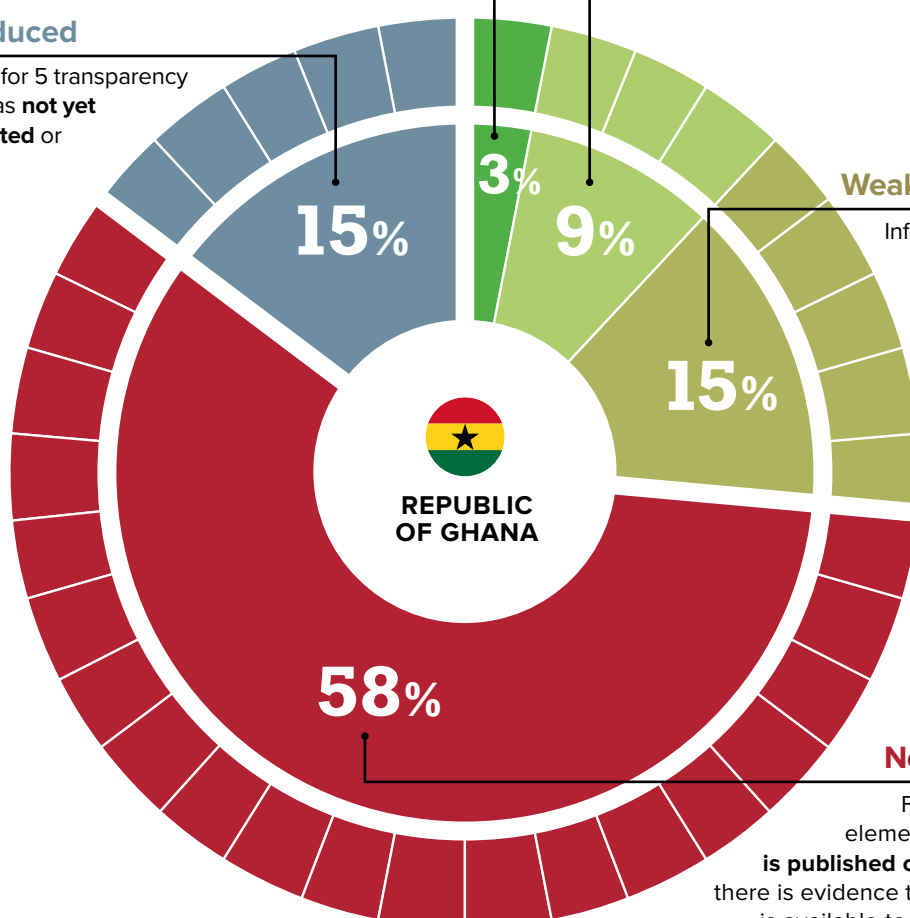
Information for 3 transparency elements is **mostly available online, but is only partially up to date**.

Weak public access

Information for 5 transparency elements is **only partially available online, and is also neither fully up to date nor easy to find**.































































No public access







For 20 transparency elements, **no information is published online**, even though there is evidence that this information is available to national authorities.



5 of the 39 transparency elements are considered as **not applicable** to Ghana's marine fisheries sector (see [Annex](#)).

DETAILED OVERVIEW







Thematic area		ID	Transparency element	AVAILABLE ONLINE?	UP TO DATE?	EASY TO FIND?	
#1	 Fisheries Laws, Regulations and Official Policy Documents	1-A	Laws on marine fisheries				Weak public access
		1-B	Fisheries policy documents				No public access
		1-C	Fisheries management plans				No public access
#2	 Fisheries Tenure Arrangements	2-A	Commercial fishing (large-scale and small-scale)				Moderate public access
		2-B	Coastal subsistence fishing				No public access
		2-C	Scientific and exploratory fishing				Weak public access
		2-D	Sport fishing				No public access
#3	 Foreign Fishing Access Agreements	3-A	Foreign-flagged vessels fishing in Ghanaian waters				Not applicable
		3-B	Ghana-flagged vessels fishing in foreign waters				Not applicable
#4	 The State of the Fisheries Resources	4-A	National reports on the state of marine fish populations				Not produced
		4-B	Scientific stock assessments				No public access
#5	 Large-Scale Fisheries	5-A	Vessels				Weak public access
		5-B	Payments				No public access
		5-C	Catches within Ghanaian waters				Weak public access
		5-D	Catches outside Ghanaian waters				No public access
		5-E	Landings in Ghanaian ports				No public access
		5-F	Transshipments and landings in foreign ports				No public access
		5-G	Discards				No public access
		5-H	Fishing effort				No public access

 To a full extent
  To a large extent
  To a limited extent
  No
  Not produced
  Not applicable



DETAILED OVERVIEW

Thematic area	ID	Transparency element	AVAILABLE ONLINE?	UP TO DATE?	EASY TO FIND?	
 Small-Scale Fisheries	6-A	Vessels	✗	✗	✗	No public access
	6-B	Licenses	✗	✗	✗	No public access
	6-C	Fishers	✗	✗	✗	No public access
	6-D	Payments	—	—	—	Not applicable
	6-E	Catches	✗	✗	✗	No public access
	6-F	Discards	—	—	—	Not applicable
 Post-Harvest Sector and Fish Trade	7-A	Imports	✗	✗	✗	No public access
	7-B	Exports	✗	✗	✗	No public access
	7-C	Employment in commercial fisheries	✓	✓	✓	Not produced
	7-D	Employment in informal fisheries	✓	✓	✓	Not produced
 Fisheries Law Enforcement	8-A	Enforcement of laws	✓	✓	✗	Moderate public access
	8-B	Sanctions for major offences	✗	✗	✗	No public access
 Labour Standards	9-A	Enforcement of labour standards	✗	✗	✗	No public access
	9-B	Sanctions for labour standard offences	✓	✓	✓	Not produced
 Fisheries Subsidies	10-A	Government financial transfers or subsidies	✓	✓	✗	Moderate public access
 Official Development Assistance	11-A	Assistance for national fisheries development	✓	✗	✓	Weak public access
	11-B	Assistance for foreign fisheries development	—	—	—	Not applicable
 Beneficial Ownership	12-A	Legal basis for beneficial ownership transparency	✓	✓	✓	Strong public access
	12-B	Beneficial ownership registry	✗	✗	✗	No public access
	12-C	Beneficial ownership disclosure in fisheries	✓	✓	✓	Not produced

 To a full extent
  To a large extent
  To a limited extent
  No
  Not produced
  Not applicable





GIVING MEANING TO TRANSPARENCY: NOTABLE EXAMPLES

The value of this TAKING STOCK assessment does not only lie in understanding what information on a country's marine fisheries is available online, and where gaps exist. Fundamentally, and in very simple terms, **public access to fisheries information is important to help answer critical questions about the sustainability of the sector.**



Given the complexity of fisheries management, answering such questions is not always a straightforward task. However, by increasing public access to fisheries information, governments provide their citizens and business partners the necessary means to engage in informed public debates.





The government of Ghana does not currently publish information online regarding numerous key areas, meaning that many important questions about the sustainable management of marine fisheries cannot be addressed. Notable examples include:¹⁴

✗	Are national policies working to achieve sustainable fisheries?	The Government of Ghana does not produce detailed information on the status of fish stocks in the country. Despite widespread fears of overfishing, and the government's commitment to rebuild fish stocks, the public in Ghana is not provided with official data that demonstrates if fisheries are being managed sustainably, and what are the biological and socio-economic impacts of government policies, such as the closed season for fishing.
✗	How important is the fishing sector for employment and livelihoods in Ghana?	There are no regular reports issued by the government of Ghana on the economic and social importance of the fishing sector, including estimates of the number of people engaged in artisanal fishing. The importance of fishing for employment and livelihoods, as well as changes to these contributions overtime, are therefore not documented or publicised.
✗	What is the contribution of fisheries to Ghana's food & nutrition security?	Although seafood is an important source of food in Ghana, the government does not publish information on fish trade, including information on the volume and value of fish exported, or the dependency on imported fish.
✗	How much does Ghana earn from fishing activities in its waters?	Both industrial and semi-industrial fishing vessels pay for the right to fish in Ghana, while artisanal fisheries are allowed to fish for free. However, the government does not publish information on the fees charged to commercial fishing vessels or the total income received.
✗	How is Ghana enforcing laws and regulations in its fisheries sector?	The Ghanaian authorities have committed to a range of actions to address illegal fishing in the country. However, there are no public records of the outcome of investigations and prosecutions, particularly for the fleet of industrial fishing vessels.
✗	Who benefits from commercial fisheries in Ghana?	Although information on beneficial ownership of fishing vessels is required by national authorities, including the Ghana Maritime Authority, this information is not publicly disclosed. It is therefore difficult for the public to understand who the primary beneficiaries of commercial fishing operations are, including the role of foreign-owned companies in Ghanaian-flagged vessels.
✗	What have been the achievements of development aid projects to the fisheries sector in Ghana?	Ghana has implemented several large programmes with financial and technical assistance from foreign donors, including the World Bank, USAID and the European Union (in total well over USD 100 million over the last decade). However, there are no government reports on the outcomes of these projects. Donor's evaluations, where these exist, are also not published on the websites of the Fisheries Commission or the Ministry of Fisheries and Aquaculture Development (MoFAD).

¹⁴ It is possible this information is published by national authorities online, but this assessment was unable to locate it, mainly due to the challenges of searching through government websites.

Unlike the previous examples, where information is available to the national authorities of Ghana but not yet published online, there are also several important aspects of the country's fisheries sector where no information exists at all. This clearly impedes the government's ability to manage fisheries sustainably, as well as stakeholders' ability to better understand their fisheries sector. Notable examples include:¹⁵

	How many people are employed in Ghana's post-harvest fisheries sector, including the proportion of women?	<p>There is no evidence to suggest public authorities collate demographic and social information on the post-harvest sector in Ghana. National census surveys do not capture this information as fisheries is not categorised as a stand-alone economic activity. This means, inter alia, that the role of women in the fisheries sector is unlikely to be fully appreciated in the country.</p>
	How are labour rights respected in Ghana's fisheries sector?	<p>Although Ghana has several laws that protect labour rights for those engaged in the fisheries sector, there appears to be no effort to monitor how these laws and rights are enforced.</p>

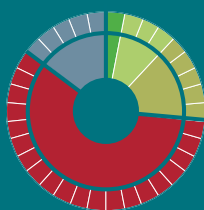


¹⁵ Countries that implement the FiTI follow its core principle of 'progressive improvement', which states that countries are not expected to have complete data for every transparency requirement from the beginning. Instead, public authorities must disclose the information they have, and where important gaps exist, demonstrate improvements over time.

A DEEP DIVE INTO PUBLIC ACCESS TO FISHERIES INFORMATION



REPUBLIC OF GHANA



Additional important insights can usually be gained by understanding whether the published information ('Public access') meets basic information requirements, is up to date and easy to find. However, given the limited state of public access to fisheries management information in Ghana, the meaningfulness of this section is limited.



AVAILABLE
ONLINE?



UP TO DATE?



EASY TO FIND?





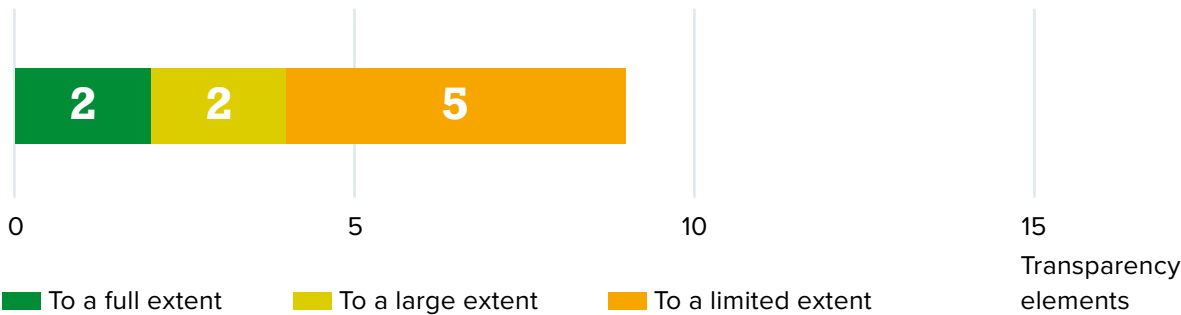
AVAILABLE ONLINE?

AVAILABLE
ONLINE?



Ghana's national authorities publish information online for **9 transparency elements** (i.e 'Public access').¹⁶ Of those elements, only **two (22%)** fully meet the information requirements of the FiTI Standard.¹⁷

Is information in accordance with the FiTI Standard available online?



There are **two primary government organisations responsible for the management of fisheries in Ghana**, the Fisheries Commission and the Ministry of Fisheries and Aquaculture Development (MoFAD). The roles and responsibilities of each of these organisations is somewhat ambiguous and there appears to be considerable overlap between the two. This is evident in their roles for achieving government transparency. Both have their own website that contain pages for similar sets of information. It is therefore unclear which organisation has the mandate to publish specific fisheries information for the public. This likely requires the Ghanaian authorities to review their policies on public access to information and commit to one central portal for fisheries information.

Despite there being two central government websites devoted to publishing fisheries information, neither contain substantial information. There are **numerous blank pages** and pages where **information has not been updated or completed**. This is a surprising situation as the Ghanaian fishing authorities have received substantial financial and technical support for information gathering and communication, including through past projects funded by the World Bank and USAID. Large amounts of money have been spent on improving fisheries transparency in the country, but so far, the results must be seen as unsatisfying.

¹⁶ From a total of 39 transparency elements, this assessment considers five as being 'Not applicable' to Ghana's marine fisheries sector, whereas five elements are considered as 'Not produced' (meaning the government has not collected or compiled the information requested under this element).

¹⁷ Or it has been found that the published information is incomplete.

The overall impression from our assessment of published information is that Ghana's authorities collate and produce significant information but do not publish this electronically. This includes, for example:

- Data on fishing efforts and catches, as well as scientific stock assessments.
- The results of the government's survey of fishing canoes, which is normally undertaken every three years, with the last one completed in 2022. These reports cannot be found on the government's fisheries websites.
- The Fisheries Commission produces an annual report, but this is only distributed in hard copies.

The noteworthy aspect of this situation is that the government of Ghana could provide detailed information and analysis of its fisheries sector through its websites. This contrast to the situation found in some other countries where the main barrier to transparency is a lack of government information and the resources to collate it. **Ghana is therefore not data deficient, rather it performs poorly in making government information accessible to the wider public.**

Disseminating information via online media (e.g. government websites) is of particular importance for Ghana, given the country's high internet usage. According to the International Telecommunication Union (ITU) 69% of all individuals in Ghana were using the Internet in 2021, a score which is significantly higher than the average for other Sub-Saharan African countries (29%), the global average among other 'lower income countries' (45%) or even the global average of Internet usage (60%).¹⁸

One of the areas where Ghana's national authorities under-perform is regarding transparency on laws, regulations and fisheries policies. There is no centralised registry of these documents, and several important ones are not published online. This is despite both the Fisheries Commission and the MoFAD having dedicated pages on their websites for laws and policy documents.

Although electronic copies of major laws and regulations can be found online, including via third-party websites, Ministerial Directives for Ghana's fisheries sector are regularly produced but not made public. This includes directives that cover permitted fishing gears as well as those that set fees for fishing licenses. Consequently, we were unable to find information on what the current fees are for different types of licenses in Ghana's fisheries sector.

Furthermore, some recent national policy documents are not published online. This includes the latest national policy for fisheries and aquaculture, the national policy on fisheries co-management, as well as the five-year national fisheries management plan. A press release issued by the MoFAD in March 2022 stated that the management plan was finalised, but there is no electronic copy of this on its website. This might be because the Ghanaian Parliament has yet to approve of the plan, although nothing precludes the MoFAD from publishing proposed policies and laws in draft for public comment, as is done in many other countries.



18 https://data.worldbank.org/indicator/IT.NET.USER.ZS?name_desc=false

On a positive note, the MoFAD has recently decided to publish a list of licensed industrial fishing vessels on its website. Publishing such a list is mandated through the 2002 Fisheries Act. There have also been longstanding demands by civil society organisations and international partners for MoFAD, the Fishing Commission and the Maritime Authority to publish such information. The decision to release this information is therefore a sign of progress. However, the list remains far from perfect. It covers a six-month period from the first half of 2022 only. The list also contains errors, such as the same vessels appearing on the list of Ghanaian-flagged vessels and the list of foreign-flagged vessels. Furthermore, the list omits certain information recommended through international standards, including information on the local agents being used by fishing companies. Given Ghana's recent commitment to improve transparency to address IUU fishing, improving the vessel registry will be vital.

Finally, a useful resource for this assessment were the annual reports on budget allocations made by the **Parliamentary Select Committee on Food, Agriculture and Cocoa Affairs**. These provide a good overview of the delivery of planned activities of the MoFAD as well as an overview of budget allocations and expenditures. Additionally, a recent medium-term performance review produced by the Ministry of Finance provides similar information.



UP TO DATE?

UP TO DATE?



The limited information that is published online is considered to be fully up to date for 7 of the 9 transparency elements (or 78%).¹⁹

Is the published information provided in a timely, up-to-date manner?



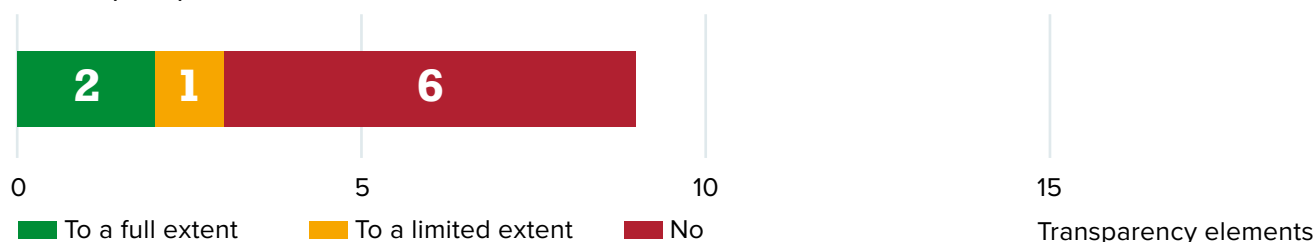
EASY TO FIND?

EASY TO FIND?



The limited information that is published online by Ghana's national authorities is generally difficult to locate, as information for 6 out of 9 transparency elements (or 67%) cannot be easily found by a layperson.²⁰

Is the published information easy to find on a government website from a non-expert point of view?



¹⁹ Fish is a renewable resource that can, if sustainably managed, remain accessible and beneficial for generations. Those making decisions affecting fisheries must be able to have quick and easy access to the latest available data. The importance of up-to-date information takes on an even greater dimension when it comes to time-sensitive issues such as the production of catch data or scientific stock assessments.

²⁰ Governments have the responsibility to manage fisheries on behalf of their citizens – and inform them about the current status, opportunities and challenges facing the sector. In the digital age, websites remain one of the most popular mediums to convey such information. However, websites are passive communications channels, and stakeholders have to purposely visit the site, search for the desired content and navigate to find information. If this is difficult or time consuming, stakeholders may lose interest, leaving potentially important information unread and underutilised. This assessment analysed how easy or difficult it is for a layperson to find information about Ghana's marine fisheries sector, instead of stakeholders with a background in fisheries and therefore holding a unique advantage in their capacity to locate the information.



‘GOOD TRANSPARENCY PRACTICES’



In addition to providing complete, timely and easy-to-find information, our assessments evaluate whether governments also publish information on the country's fisheries sector that go beyond minimum standards and that the FiTI considers as 'good transparency practices'.

No such practices were found for Ghana's marine fisheries sector.



Finally, our assessment found that Ghanaian national authorities rarely integrate features into government websites or documents to ensure that published information can be freely used (e.g. via search and filter functions), re-used and redistributed by anyone.

For example, the list of registered vessels, as published on the website of the MoFAD, is only available for download as a .pdf document. No such data can be easily extracted and imported into a spreadsheet for further analysis.

Furthermore, no information was found over the course of this assessment to indicate whether fisheries-related data provided by Ghana's national authorities is released under an open and unrestricted license, such as those developed by Creative Commons.²¹



²¹ Licenses should be published and linked to open data to ensure users can easily find and understand the conditions of data access and reuse. For more information, please refer to: <https://opendatacommons.org/licenses/>

RECOMMENDATIONS FOR NATIONAL AUTHORITIES OF GHANA



While the national authorities of Ghana publish some information on the country's marine fisheries online, there are several ways to further strengthen transparency in the management of the sector:

1. Make currently unpublished information publicly available

There are many aspects of fisheries management where government information is currently not being published. Although this includes a long list of information, the following are documents and information that could easily be published online:

- A complete and updated fishing vessel registry, including information on beneficial owners and fishing agents;
- An annotated list of key laws and policy documents, including Ministerial Directives;
- The results of the canoe frame surveys for the artisanal fisheries sector;
- Information on scientific stock assessments, including short explanatory texts on the key findings and the biological and socio-economic impacts of government policies, such as the closed season for fishing;
- Data on imports and exports of fish.

2. Address information gaps

While it is acknowledged that collating additional information on the fisheries sector is time consuming and may require resources, the lack of public information on the post-harvest sector represents an important gap in government information. *There could be opportunities for the MoFAD and the Fisheries Commission to work with the Ghana Statistical Service to ensure future labour market surveys and censuses include more granular questions on the fisheries sector.*



3. Provide a centralised portal for fisheries information

Having two websites for government information on fisheries is clearly a source of confusion. It will likely result in duplication of efforts if both the Fisheries Commission and the MoFAD take measures to improve government transparency.

The existing two websites are also not designed well. Therefore, to improve on government transparency a single government website could be considered for fisheries information, and the design of this should reflect national priorities in fisheries management, such as a dedicated page of information on stock assessments, as well as information on industrial fishing and artisanal fisheries. The website should also provide up-to-date information on policies and regulations for fisheries, with the ability to post draft documents for public comment.

4. Produce a comprehensive annual report on the management of the fisheries sector

The Fisheries Commission produces an annual report in hard copy only. This suggests that accountability for the delivery of fisheries management is primarily directed towards other government authorities and parliament, but not the public. An annual report released online that summarizes information on the fisheries sector and explains achievements in fisheries management would significantly improve government transparency and accountability. In the previous five-year fisheries management plan, the government committed to annual reports on the implementation of the plan, but these were not produced.

Strengthening transparency of Ghana's marine fisheries sector by, among other things, reviewing and prioritising these recommendations, should be based on ongoing discussions with stakeholders, such as fishers, fishing companies, civil society and academia. This may further help to identify other important information gaps regarding national priorities which have not been covered under this assessment (such as the impacts of climate change or the interactions between fisheries and other sectors in the blue economy).

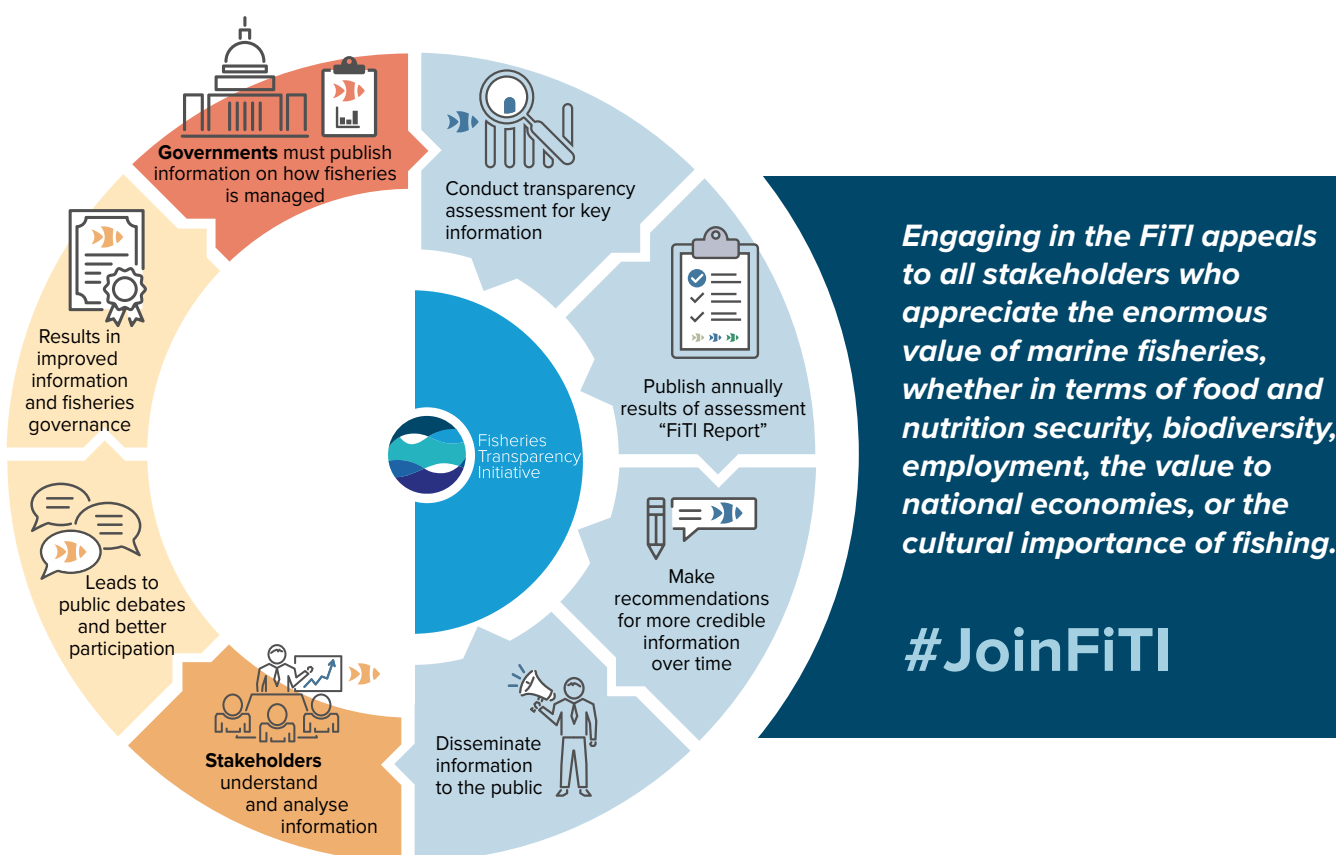
TRANSPARENCY NEEDS TRUST

Public access to information on how Ghana's marine fisheries sector is being exploited is fundamental for good governance. This TAKING STOCK assessment provides a sound starting point for national authorities in Ghana to enhance and maintain high levels of transparency in marine fisheries management. But it does not tell the whole story: challenges still exist that are unlikely to be overcome by a single actor working alone. Such challenges involve determining whether information that is not published online simply does not exist, or whether information that is disclosed is perceived as credible by stakeholders. Addressing such challenges requires a comprehensive and inclusive approach.

Therefore, a collective effort is needed from all relevant stakeholders to incorporate a variety of perspectives and enhance transparency and trust over time.

The Fisheries Transparency Initiative (FiTI) provides such a unique combination of transparency and participation. The FiTI is implemented in countries through National Multi-Stakeholder Groups, consisting of representatives from government, business and organised civil society. These groups work collectively to:

- » assess the information in the public domain against the FiTI Standard;
- » make recommendations on how to prioritise the closure of information gaps; and
- » provide suggestions on how information published by national authorities can be strengthened to further raise levels of openness and public access to information.



ANNEX: ASSESSMENT PROCEDURES

This TAKING STOCK transparency assessment evaluated the disclosure practices of Ghana's national authorities across 12 thematic areas of **marine fisheries management**,²² as defined by the FiTI Standard. In order to avoid ambiguities during the assessment, these 12 thematic areas have been further broken down into **39 transparency elements**. For example, thematic area #1 'Fisheries Laws, Regulations and Official Policy Documents' is broken down into three transparency elements.

The assessment focused entirely on the availability of information²³ provided by Ghana's national authorities through their own websites and online publications.

This report, the first for Ghana, does not only seek to provide an overview of what the government publishes regarding a number of key areas of its marine fisheries sector. It also intends to provide a sound basis of information to spark interest among various governmental and non-governmental stakeholders.

The assessment did **not** try to capture and display the actual underlying information behind each transparency element (e.g. number of vessels), nor did it undertake an independent verification of whether information disclosed online by national authorities is complete or correct. Nevertheless, if compelling evidence of unreliable or contradicting information was found, it is noted in the Detailed Assessment Report.

Within the scope of this assessment, several different entry points were utilised to evaluate whether information on Ghana's marine fisheries sector is published online by national authorities, such as:²⁴

- Through the Ghanaian government's central Digital Services and Payments Platform (www.ghana.gov.gh);
- By directly accessing websites of national authorities, such as the Fisheries Commission or the MoFAD;
- By utilising external search engines, such as Google or Microsoft.

The assessment was conducted as a **desktop study** without relying on initial input or contributions from national authorities.

The assessment was conducted over a period of 6 months (November 2022 - April 2023). The process was officially launched on 2 November 2022 when the Ministry of Fisheries and Aquaculture Development (MoFAD) was informed about the upcoming assessment, its key parameters and benefits.

The Ministry of Fisheries and Aquaculture Development was invited to comment on the initial research findings prior to the publication of this report. The timeframe for this review was between 28th of March and 19th of April 2023.

Unfortunately, no comments were received prior to this deadline. Therefore, the report was finalised without government input.

The overall assessment process was conducted under the supervision and responsibility of the FiTI International Secretariat, with significant input from researchers and reviewers.

22 Information on inland fisheries and aquaculture does not form part of this assessment.

23 Kindly note that in the context of this research, the terms '**data**' and '**information**' are used interchangeably. It is acknowledged that while closely intertwined, they differ in meaning and usage (e.g. data is the raw fact, which should be processed to gain information). However, this difference is not of major relevance for this assessment.

24 Information is only considered available online if it is proactively published on a government website and is available without access restrictions (e.g. the need to register online, request the data from a civil servant via email or pay a fee).

As part of this TAKING STOCK assessment, several transparency elements were considered as not applicable to Ghana's marine fisheries:

—	Foreign fishing access agreements	<p>There is no evidence that Ghana has entered into bilateral agreements that provide foreign-flagged vessels to fish in its waters. Ghana does not have a Sustainable Fisheries Partnership Agreement with the European Union, and there are no reports indicating it has signed agreements with Asian countries, including China, Korea or Japan. The majority of industrial fishing vessels operating in Ghana are registered under the Ghanaian flag. European vessels fishing for tuna obtain private licenses.</p> <p>Although industrial fishing vessels flagged to Ghana operate in the waters of other countries, there is no evidence that Ghana has signed bilateral agreements with these countries.</p>
—	Small-scale discards	<p>As most fish caught by Ghanaian artisanal fishers is destined for subsistence purposes, it is assumed that discards from the small-scale sector are minimal.</p>
—	Small-scale payments	<p>Although a license for artisanal fisheries is required by law, no government information is published regarding payments to the Fisheries Commission. It has therefore been assumed that no fees are being issued.</p>
—	Aid for the development of foreign fisheries	<p>Ghana does not provide Official Development Assistance (ODA) to the fisheries sectors of foreign countries.</p>





Fisheries
Transparency
Initiative

TAKING STOCK

Online Transparency of Fisheries
Management Information



2023

Summary Assessment Report
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