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**Promotion and protection of all human rights, civil,
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including the right to development**

Report of the Working Group on the rights of peasants and other people working in rural areas on their visit to Ghana

Comments by the State*

* The present document is being issued without formal editing.



Comments by the Government of the Republic of Ghana on the report of the Working Group on the Rights of Peasants and Other People Working in Rural Areas on its visit to Ghana

I. Introduction

1. The Government of the Republic of Ghana welcomes the report of the Working Group on the Rights of Peasants and Other People Working in Rural Areas (“the Working Group”) following its official visit to Ghana from 5 to 14 May 2026 (A/HRC/63/26/Add.1). Ghana reiterates its appreciation to the Working Group, and in particular to its members, Ms. Genevieve Savigny and Ms. Uche Ofodile, for the constructive and collegial spirit in which the visit was conducted, and for the Working Group’s recognition of Ghana’s political commitment to the well-being of its rural population.

2. Pursuant to the invitation extended by the Secretariat, the Government submits these comments for consideration alongside the Working Group’s report at the sixty-third session of the Human Rights Council. The comments are organised thematically, following the structure of the report, and are intended to: (a) provide factual clarifications on specific matters raised in the report; (b) share updated information on legislative, policy and operational developments since the visit; and (c) indicate the Government’s position on the Working Group’s recommendations.

II. General Observations and Factual Clarifications

3. The Government broadly concurs with the Working Group’s overall assessment that Ghana has developed a relatively robust legislative and policy framework relevant to the United Nations Declaration on the Rights of Peasants and Other People Working in Rural Areas (UNDROP), and that translating this framework into consistent implementation at the community level remains the central challenge. The Government takes this assessment seriously and views the report as a valuable contribution to ongoing national efforts.

4. The Government wishes to offer the following factual clarifications, in the interest of accuracy:

(a) The Working Group met with officials from the Ministry of Environment, Science and Technology; the reference in paragraph 2 of the report should be corrected accordingly.

(b) The field visits referred to in paragraph 2 of the report were conducted in the Suhum Municipality and the Abuakwa South Municipality (Kyebe), in the Eastern Region, rather than a generic “Kyebe area.”

(c) Pursuant to the Environmental Protection Act, 2025 (Act 1124), which entered into force in January 2025, the former Environmental Protection Agency was reconstituted as the Environmental Protection Authority, with an expanded regulatory mandate. References in the report to the “Environmental Protection Agency” should accordingly read “Environmental Protection Authority.”

(d) The pastoralist communities referred to at several points in the report, including in paragraphs 59, 62 and 89, are more accurately identified as Fulani, the term in common usage in Ghana, rather than “Fulbe.”

5. On the characterisation of certain findings, the Government offers the following observations for greater precision. Paragraph 69 describes the environmental consequences of illegal mining as amounting to a “catastrophic collapse” of local agrarian ecosystems, with “poisoning” of nearly every stream in affected areas. The Government does not understate the seriousness of the environmental degradation associated with illegal mining, discussed further in section VIII below; however, water quality monitoring by the Water Resources Commission indicates that contamination, while serious and geographically extensive, is not

uniform across all water bodies in mining-affected districts. A more precise formulation would note that affected water bodies show significant signs of contamination and that the practice has placed considerable strain on local agrarian ecosystems. Similarly, the characterisation in paragraph 70 that reports to local police “were often met with indifference or obstruction” would benefit from acknowledging that responses varied, with some community members reporting procedural delays or limited engagement rather than uniform indifference.

III. Legislative and Institutional Framework

6. Since the Working Group’s visit, the Government has continued to strengthen the legislative architecture referenced in the report. The Environmental Protection Authority’s mandate over pesticide control, hazardous waste, climate adaptation and environmental compliance has been expanded under Act 1124, alongside new institutions including the National Environment Fund and the Ghana Carbon Registry. Six sets of implementing regulations under Act 1124, covering environmental assessment, effluent, air quality, ozone, petroleum and equipment certification, were passed by Parliament in 2026 to operationalise the Act.

7. The Government also draws attention to continuing efforts regarding the outstanding ILO instruments referenced in paragraph 7 of the report, including the Occupational Safety and Health Convention, 1981 (No. 155), and notes that technical consultations with social partners on ratification prospects remain ongoing.

IV. The Situation of Peasant Farmers and Agricultural Policy

8. The Government welcomes the Working Group’s recognition, in paragraphs 14–22, of the macroeconomic stabilisation achieved in 2026, including single-digit inflation and rebounding GDP growth, alongside the residual vulnerabilities this leaves for rural households. In 2025 the Government launched the “Feed Ghana” programme as the successor to “Planting for Food and Jobs,” with a deliberate shift in emphasis from input subsidisation alone toward integrated investment in aggregation, storage, agro-processing and market linkages, delivered through the Ghana Agriculture and Agribusiness Platform referenced in paragraph 16 of the report. The Government takes note of the Working Group’s concern, in paragraphs 17–19, regarding the historical allocation of subsidy budgets predominantly to synthetic fertiliser, and confirms that the design of Feed Ghana reflects a rebalancing toward post-harvest infrastructure, consistent with recommendation 85(a).

9. The Government shares the Working Group’s concern, reflected in paragraphs 21–22, regarding the structural tension between the promotion of large-scale, export-oriented agri-industrial investment and the protection of smallholder livelihoods. The Government’s position is that these are not mutually exclusive objectives, and that policy instruments including the Ghana Agriculture and Agribusiness Platform, the Customary Land Secretariats established under the Land Act, and continuing engagement with smallholder farmer associations are intended to ensure that commercial agricultural expansion does not come at the expense of family farming, which the Government recognises, consistent with the report’s findings, as the foundation of national food security.

V. Land Rights and Tenure

10. The Government reaffirms its commitment to the full implementation of the Land Act, 2020 (Act 1036), including the operationalisation of Customary Land Secretariats across all traditional areas, which remains an ongoing, phased process. The Government agrees with the Working Group’s observation, at paragraph 26, that access to information regarding compulsory acquisition and resettlement requires improvement, and notes that the Environmental Protection Authority and the Lands Commission are reviewing public notification procedures for Environmental and Social Impact Assessments, including the

language and mode of publication of project notices, with a view to improving accessibility for affected rural communities.

11. On compensation for resettlement, referenced in paragraph 28, the Government confirms that the Land Act's pre-acquisition compensation funding mechanism is intended to apply to all persons with a demonstrable interest in affected land, including tenant farmers and sharecroppers, and not solely to landowners or customary title holders, and welcomes the Working Group's recommendations, at 86(d) and 86(e), that resettlement prioritise livelihood restoration and account for the gendered impacts of land loss.

VI. Seeds, Biological Diversity and Environmental Decision-Making

12. The Government notes the Working Group's observations, in paragraphs 37–40, regarding the commercial release of genetically modified Bt cowpea and the associated public consultation process. Approvals by the National Biosafety Authority are conducted pursuant to the Biosafety Act, 2011 (Act 831), and the Government confirms that the mandatory labelling requirement for genetically modified food products, ordered by the High Court in 2024, remains in force. The Government welcomes the Working Group's recommendation, at 87(b), for enhanced grassroots consultation and independent ecological risk assessment ahead of future approvals, and will convey this recommendation to the National Biosafety Authority for consideration in its ongoing review of approval procedures.

13. The Government notes the concerns raised in paragraph 40 regarding the international transfer and potential patenting of genetic material derived from Ghanaian farmer varieties, and confirms that the review of the Plant Variety Protection Act, 2020, referenced in recommendation 87(a), is under consideration by the Ministry of Food and Agriculture, with a view to safeguarding traditional seed-saving, sharing and exchange practices.

VII. Rights of Women Farmers

14. The Government welcomes the Working Group's attention to the situation of women accused of witchcraft, and provides the following update. The Anti-Witchcraft Accusations Bill, which would amend the Criminal Offences Act, 1960 (Act 29), to criminalise witchcraft accusations and the practice of witch-finding, was reintroduced in Parliament in 2026 by a bipartisan group of Members of Parliament. Proposed amendments are currently before the Office of the Attorney-General and Ministry of Justice as part of the legislative process, and the Ministry of Gender, Children and Social Protection continues to engage civil society partners, including on reintegration support for residents of so-called "witch camps." The Government reiterates that the passage of this legislation, referenced in recommendation 88(a), remains a priority.

15. The Government confirms ongoing implementation of the 30 percent gender inclusion mandate under the Affirmative Action Act, 2024 (Act 1121), including with respect to the distribution of State agricultural inputs, consistent with recommendation 88(c). The Government also notes the Working Group's recommendation, at 88(b), regarding recognition of women's unpaid agricultural labour in property and inheritance disputes, which will be conveyed to the Judicial Service for consideration.

VIII. Pastoralists and Transhumant Communities

16. The Government acknowledges the challenges documented in paragraphs 58–64 regarding the situation of Fulani pastoralists, including restricted access to formal citizenship documentation and the friction generated as climate-driven migration pushes herds into settled agricultural zones. The Government notes the Working Group's concern, at paragraph 62, regarding the conduct of security operations affecting Fulani herders, and confirms that all security operations are expected to be conducted in accordance with the law and with due regard for the human rights of all persons, irrespective of ethnicity or migratory status. Any

specific, substantiated allegations of disproportionate conduct remain a matter for the appropriate oversight and complaints mechanisms, including the Commission on Human Rights and Administrative Justice.

17. On the implementation of the ECOWAS Protocol on Transhumance, referenced in paragraph 65 and recommendation 89(b), the Government confirms that the National Transhumance Committee remains active and that work to establish demarcated grazing corridors continues at the district level. The Government agrees, however, that implementation has been slower than intended, consistent with the Working Group's observation, and reaffirms its commitment to accelerating this process in close consultation with both pastoralist and host farming communities.

IX. Illegal Small-Scale Mining (Galamsey)

18. The Government shares the Working Group's grave concern regarding the environmental, social and human rights consequences of illegal small-scale mining, documented extensively in paragraphs 66–81 of the report, and confirms that combating galamsey remains among the Government's highest national priorities. The Government does not dispute the report's finding that enforcement to date has fallen short, notwithstanding successive operations.

19. Since the Working Group's visit, the Government has taken further measures. All forest reserves and major river bodies have been designated protected "Security Zones," with mining activity within these zones now categorically prohibited, building on the ban on mining in forest reserves introduced in December 2025. The National Anti-Illegal Mining Operations Secretariat (NAIMOS) continues to receive dedicated training and resourcing. Land reclamation efforts have also produced tangible results: in February 2026, the Ministry of Lands and Natural Resources confirmed the reclamation of an 800-acre former galamsey site at Nyankumase in the Ashanti Region.

20. The Government acknowledges the Working Group's concern, reflected in paragraph 71 and recommendation 90(a), that enforcement has disproportionately targeted low-level labourers rather than the financiers and equipment owners who capitalise mechanised illegal mining operations, as well as continuing public concern regarding the alleged complicity of some officials. The Government confirms that shifting the focus of enforcement toward the investigation, prosecution and asset forfeiture of financiers, together with strengthening the integrity of enforcement personnel, remains a Government priority. The Government notes ongoing public and civil society debate, including calls from traditional authorities and civil society organisations for a formal state of emergency in affected forest reserves and river bodies, and confirms that all options for strengthening enforcement, including the legislative proposal referenced in recommendation 90(b) to consider criminalising ecocide, remain under active consideration.

X. Response to Recommendations and Concluding Remarks

21. The Government accepts the great majority of the Working Group's recommendations set out in paragraphs 84–92 of the report, and reaffirms its commitment to their progressive implementation, several elements of which, as indicated above, are already under way. The Government will continue to engage the Commission on Human Rights and Administrative Justice, civil society organisations and development partners, including FAO, UNDP, UNICEF, IOM and ILO, in translating these recommendations into concrete action.

22. The Government reaffirms its appreciation to the Working Group for its engagement, and looks forward to continued cooperation, including through appropriate follow-up on the implementation of the recommendations contained in the report.