NATIONAL FISHERIES ASSOCIATION OF GHANA
(NAFAG)
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Our Ref. NAFAG/H.E Pres./01

Your Ref.....

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6TH OCT. 2026

His Excellency John Dramani Mahama
President of the Republic of Ghana,
Jubilee House,
Accra - Ghana.

REQUEST FOR SUSPENSION OF GRANT OF OFFSHORE RECONNAISSANCE LICENCE TO GOLD COAST GRC GHANA LTD. FOR GOLD EXPLORATION IN GHANA'S SHALLOW CONTINENTAL SHELF

On behalf of the National Fisheries Association of Ghana (NAFAG), the umbrella fisheries association that coordinates the activities of its five (5) underlisted member associations, I wish to inform you of our opposition to the grant of offshore reconnaissance license to Gold Coast GRC Ghana Ltd. for gold exploration in Ghana's shallow continental shelf and suspension of same, until further consultations are held with fishers and Fisheries Impact Assessment conducted in addition to any other requirement of the Environmental Protection Authority on the Project per section 50 (1) and (3) of the Fisheries and Aquaculture Act, 2025 Act 1146:

I. **Ghana Industrial Trawlers Association;**
II. **Ghana Tuna Association;**
III. **Ghana National Canoe Fishermen Council;**
IV. **National Inland Canoe Fishermen Council; and**
V. **Ghana Inshore Fisheries Association.**

The above-mentioned fisheries associations also represent the five (5) sub-sectors of Ghana's fisheries.

Your Excellency, NAFAG's above stand is based on the following:

I. **Area of coverage of the offshore reconnaissance licence;**
II. **Lack of high level consultation with fishers prior to the grant of licence;**
III. **Lack of fisheries impact assessment;**
IV. **Lessons learnt from seabed mining impacts on fisheries in other jurisdictions; and**
V. **Scientific impact of seabed mining on fisheries ocean**

(I) Area of Coverage of the offshore reconnaissance licence

NAFAG is reliably informed that Gold Coast Resources Corp. reports "**that it holds ten offshore reconnaissance licences covering approximately 10,00 km², extending along about 300 kilometres of Ghana's coastline between Half Assini and Winneba and reaching about 33 kilometres offshore. The Fisheries and Aquaculture Act, 2005 (Act 1146) defines the Inshore Exclusion Zone (IEZ) as the coastal waters between the coastline and twelve nautical miles offshore, or about 22 kilometres. The company's published map therefore indicates that substantial portions of the licensed area fall within the IEZ, although the precise area of overlap requires publication of the official cadastral coordinates and licence instruments**".

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In this era, when Ghana is taking conservation methods for small scale fisheries, the licence coverage area around Greater Cape Three Points where the first and only Marine Protected Area was officially launched on 14th April, 2026 at Busua, after painstaking efforts would be negatively impacted by the offshore reconnaissance operation derail efforts by the country aimed at halting further decline of fish stocks.

(II) Lack of high level consultation with fisher prior to the grant of licence

NAFAG cannot deny the fact that a stakeholder consultation was held at the Accra City Hotel on 9th July, 2026, the Report of which NAFAG has not received to date and could therefore not make inputs.

Added to the foregoing, is the expectation that the competent authorities should have contacted a key stakeholder in this venture, ie, NAFAG, for close consultations for its inputs.

Perhaps, it is not surprising that the foregoing did not happen considering the fact that the Fisheries Environmental Impact Assessment which is provided by law was even ignored.

(III) Lack of Fisheries Impact Assessment

NAFAG observes that the provisions of Section 50 (1) of the Fisheries and Aquaculture Act, 2005 Act 1146 that requires that;

> **"A person that plans to conduct an activity other than fishing, which is likely to have a substantial impact on the fishery resources or other aquatic resources of the Republic, shall inform the Commission of the plans of the person before the commencement of the planned activity for the purposes of the conservation, the protection of the resources and the conduct of a Fisheries Impact Assessment".**

However, **Gold Coast GRC GHANA LTD** did not inform the Fisheries Commission as required by law but was licensed for gold exploration in Ghana's shallow continental shelf which is **"an activity other than fishing"** and has **"a substantial impact on fisheries resources or other aquatic resources of the Republic".**

To say the least, this is unacceptable to NAFAG, its member associations and millions of Ghanaians in the fisheries value chain because the negative impacts of seabed mining will undoubtedly have negative impacts on their livelihoods, incomes and food security.

(IV) Lessons learnt from seabed mining impacts on fisheries in other jurisdictions.

NAFAG recognizes the fact that the licence granted to **Gold Coast GRC GHANA LTD** is for offshore **Reconnaissance**, covering approximately 10,000km² and that the company has undertaken 50,000 line-kilometers of airborne magnetic data have already been collected across 100% of the licensed area, with more detailed work focused on a 500km² priority area encompassing the mouth of the Ankobra.

Information available on Papua New Guinea (Bismarck Sea) which was the site of the World's most high-profile seabed mining venture in the **Solwara Project** reported significant decline in tuna, shark and artisanal fish catches during preliminary testing and **exploration** phases, due to heavy machinery operations and test-dredging, produced sediment plumes, noise pollution, and toxic heavy-metal suspension that drove away pelagic fish stocks and disrupted traditional **"Shark Calling"** practices.

NAFAG wishes to emphasize that the foregoing happened during the **Exploration phases**, which is exactly what the current licence granted to **GOLD COAST GRC GHANA LTD** covers and the probability of similar effects on fish stocks in this country is high.

It is worthy of note that the fierce resistance from the Alliance of Solwara Warriors – a coalition of indigenous fishers and the eventual financial collapse of the operator led Papua New Guinea to declare a national moratorium on deep-sea mining.

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The probability of the **GOLD COAST GRC GHANA LTD** being granted licence for actual exploitation could be high, should the company discover gold in commercial quantities and therefore the negative impacts of their operations in Ghana could be foreseen when consideration is given to the effects of actual exploitation as captured in other countries.

Should this happen and the company begin marine seabed dredging and seabed suction operations, then the experience of such an activity in South Africa (West Coast) informs us of the degradation of crucial nearshore nursery grounds for species as the **West Coast Rock Lobster and Snoek** (a vital commercial pelagic fish).

Suction dredging destroys benthic flora, smothers vital shell fish beds with settled silt, and alters benthic ecology, making it difficult for target fish stocks to recover.

Again, fisher associations (such as the **Abalobi** network and traditional small-scale fishers) repeatedly took legal action against offshore mining permits to protect their livelihoods from marine habitat destruction.

Another example worth mentioning is the one in **New Zealand (Taranaki Bight** and **Chathan Rise)** that involved offshore seabed Iron sands (Containing iron, titanium, and gold traces) and seabed phosphate deposits where mining firms attempted large-scale seabed vacuuming of New Zealand's South and North Island Coasts caused severe concern over the smothering of **snapper, terakihi,** and **blue cod fisheries.**

Once again, united campaigns by commercial fishing Federations (Fisheries Inshore New Zealand) and indigenous Maori groups, led New Zealand courts to revoke seabed mining permits, citing the irreversible risk to marine ecosystems and commercial fishing.

(V) Scientific Impact of Seabed mining on fisheries resources

The following Key Takeaways on how Seabed Mining Destroys Fisheries provide verifiable scientific lessons that should prevent us from going the way of those countries mentioned, which should rather inform and guide us to be proactive enough to prevent such occurrence in Ghana.

It is therefore, precisely for the foregoing that NAFAG and all its member associations that operate tuna vessels, industrial trawlers, semi-industrial vessels trawlers both marine and inland artisanal fishers call on the Ministry and Government of Ghana to suspend the off licence for offshore gold reconnaissance granted to **GOLD COAST GRC GHANA LTD** to prevent marine habitat destruction even before it discovers gold in commercial quantity which could lead to the granting of seabed mining licence.

The exploitation activities and their negative impacts on fish and fishery resources to the detriment of millions of people of Ghana for food security, employment, livelihoods, foreign exchange and contribution to the Gross Domestic Product of the Country is the reason for the call by NAFAG.

We count on **Your Excellency's intervention and the cooperation of all relevant duty bearers** in this regard and hope to hear positively from Government at the earliest opportunity.

Yours faithfully,

Nana Jojo Solomon
President

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Cc : The Hon. Minister – MoFA

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