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Stopping a False Start: Identifying Corruption Risks in Ghana's Nascent Lithium Sector

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Key messages

- As lithium demand grows to meet global electrification ambitions, new producers like Ghana are entering the market. Yet insufficient attention to the corruption risks in the sector—particularly in licensing and revenue collection decisions—could undermine these efforts.
- Corruption cases from other lithium producers, both new and old, have shown many familiar risks, such as licensing irregularities and opaque pricing structures.
- There are also pertinent lessons from elsewhere in Ghana's mining sector, where cases involving bribery, favoritism, politically exposed persons and failures to follow award processes have caused harm.
- By acting now to strengthen transparency, ensure fair processes and bolster enforcement, Ghana can ensure that its lithium sector avoids previous pitfalls experienced elsewhere in the country's mining sector and by other lithium producers.

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Introduction

Ghana's mining sector is expanding from gold to green. The country is ramping up production of key minerals needed for the energy transition, with lithium at the center of this plan. Since the first deal was proposed in 2024, Ghana has debated how to learn from past mistakes and ensure that the lithium deal best serves the country. Yet one element that could undermine this ambition has received insufficient attention: the risk of corruption.

We know that corruption is a high risk across transition minerals. NRGI's research has identified over 50 cases of corruption risk in the licensing and contracting stage alone, and similar problems in the midstream part of the value chain.

In other lithium producers, both new and old, we have seen how corruption has meant that citizens have received fewer benefits from mining, while communities and nature have suffered. Common corruption risks have appeared across countries, such as licensing irregularities, opaque pricing structures, and the involvement of people or companies with a worrying track record.

Drawing on evidence from elsewhere in Ghana's mining sector, and the experience of other lithium producers, we outline key corruption risks below, the risk factors that make them more likely to occur, and initial ideas for how to tackle them.



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What plans are there for lithium production in Ghana?

Ghana has recently emerged as a potential lithium producer at a time of rapidly growing global demand for minerals critical to the energy transition, with current proven lithium reserves in Ewoyaa and Agyasimanku (a relatively small deposit). Ewoyaa straddles eight small deposits, and is projected to hold 36.8 million metric tons of lithium bicarbonate (Li2O). An agreement yet to be ratified between the government of Ghana and Barari DV Ghana (a subsidiary of Australia-based Atlantic Lithium Company) may see the production of hard-rock lithium typical of Ghana's geology. Additional prospecting licenses were granted to the company for projects in Bewadze and Senya Beraku. This makes the Atlantic Lithium Agreement the only active lithium license in Ghana, subject to further discoveries and licenses to be granted. Publications (mineral rights application bulletin) by the Minerals Commission also indicate that a license application was initiated in 2025 in Kodwokurom, in the Eastern Region by Cooperative Fire Golden Limited.

In Ghana, the process for the securing mining licenses is generally applicable across types of mineral, and as such, the general application process is the same as provided by law. Table 1 below summarizes the licensing process. The conclusion of this process does not confer rights on a company until the agreement is ratified by Parliament in accordance with the law.

Table 1: Summary of Ghana's mineral license application process

General Mineral Licensing Process	
Stage	**Requirements**
1	Submission of applications at the district office. Time is allowed for notification of errors and corrections.
2	Publication of the application in the gazette, to serve as public notification.
3	Stakeholder engagement, including a 21-day period for stakeholders to submit concerns about the application.
4	Review of the application by the Minerals Commission and a 30-day period for the commission to make recommendations to the Minister of Lands and Natural Resources.
5	Decision-making by the Minister within 60 days of receiving recommendations from the Minerals Commission.
6	Approval or rejection of the application within 21 days, and the applicant to be notified. Where an application is rejected, reasons for the rejection to be communicated in writing.
7	Payment of applicable fees within 60 days and notice of the payment to be given in writing to the Minister and the Commission.
8	Issue of license by the Minister on the submission of proof of payment of applicable fees, within 30 days of the grant.

Source: Minerals Commission of Ghana

Generally, Ghana's mining revenues flow through a combination of fiscal and non-fiscal channels, with companies contributing through taxes such as corporate income tax, withholding tax, pay as you earn, royalties and other statutory levies, while also paying dividends, license and processing fees, and administrative charges. Fiscal revenues are collected by the Ghana Revenue Authority and deposited into the Consolidated Fund, except for mineral royalties. These, along with dividends from the state's free carried interest, are designated under the Minerals Income and Investment Fund (MIIF) Act for the Minerals Income Investment Fund, which has itself seen an amendment by ACT 1137, transferring 78 percent of the royalties to the Mineral Income Holding Account managed by the Minister of Finance. In practice, only royalties go to MIIF, while dividends from the fund's investments still flow to the Ministry of Finance. Non-fiscal revenues (other than dividends) are retained as internally generated funds by sector regulators, such as the Minerals Commission, consistent with public finance rules. The legal framework guiding these revenue flows is set out in the Income Tax Act and the MIIF Act.

It is expected that these general provisions in the law on the collection and management of revenues will apply to the lithium value chain, subject to specifically negotiated terms of agreement. For the Atlantic Lithium Agreement, the company is contracted to pay to Ghana all levies and charges as provided under applicable regulations; to carry Ghana's 13 percent free Carried and Participating Interest (CAPI), and to pay annual ground rent to the Office of Administrator of Stool Lands yearly and in advance. It is also required to pay an annual mineral rights fee, the agreed royalty rate to the government through the Ghana Revenue Authority, and company taxes in accordance with applicable laws.

Generally, each step of the licensing and revenue-collection chain presents potential pressure points where corruption could take hold, from the initial submission and vetting of license applications, through ministerial approvals and parliamentary ratification, to the payment and administration of royalties, taxes and fees. The complex nature of the processes, coupled with discretionary decision-making at various stages and multiple institutions handling different revenue streams, increases opportunities for undue influence, favoritism and opaque arrangements. Safeguarding integrity at these junctures will be critical to ensuring that the sector is governed transparently and that the country secures its fair share of the benefits.



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What corruption red flags have arisen in other countries' lithium sectors?

In assessing where risks may emerge in Ghana's lithium sector, it is important to consider the experience of existing and fellow potential lithium producers. Lithium production methods vary by country, with brine extraction common in Latin America and hard-rock extraction more prevalent elsewhere. Corruption methods and risks are also context-specific. However, there are still important lessons that Ghana can learn from the experience of others, whether around the challenges of navigating intersections with political elites, licensing legal battles, or smuggling and illicit trade.



Chile

Unlike Ghana, Chile's lithium sector has been in production for decades. The country is the world's second-largest producer and holds the world's largest reserves, drawing on lithium brines rather than hard-rock deposits. Yet these years of production have not been without controversy, offering lessons about pitfalls to avoid. Research carried out by Chilean civil society organization (CSO) Fundacion Terram, using NRGI's corruption diagnostic tool, identified risk areas around undue private influence over laws and regulations, favoritism in decision-making, poorly governed community consultations, and companies manipulating the factors that determine their income obligations.

Corruption risk case: In 2017, U.S. courts charged Sociedad Química y Minera de Chile, S.A. (SQM), a Chilean mining and chemical company, over USD30 million for violating the U.S. Foreign Corrupt Practices Act (FCPA) and the Securities Exchange Act. Court documents alleged that over a period of seven years, SQM made roughly USD14.75 million in "improper payments to Chilean politicians, political candidates, and individuals and entities connected to them." Much of this money travelled through a discretionary account controlled by the then-CEO. SQM executives also disguised the payments with "ideologically false"[1] invoices and contracts, and falsely recorded them on the company's books.

Outflows from the discretionary CEO account included transfers to dozens of foundations controlled or supported by Chilean politicians or their families, as well as support for a Chilean senatorial campaign. While U.S. court filings did not describe the purposes behind all the payments, nor list what SQM ultimately received in exchange for them, prosecutors did note that SQM executives "funnelled approximately USD 630,000 to foundations controlled by a Chilean official with influence over the government's mining plans." The U.S. charges built on earlier investigations in Chile, which alleged similar practices dating back to the 1990s.

Founded in 1968, SQM was nationalized in 1971 under the government of Salvador Allende and then privatized in the 1980s during the dictatorship of Augusto Pinochet. Julio Ponce Lerou, then Pinochet's son-in-law, was appointed chairman of SQM in 1987. He resigned from the position in 2015 amid the FCPA probe, although was not personally charged.



Corruption red flags:

- Bribery, payments or favors to influence decisions
- Long-term pattern of giving gifts or favors to politically exposed persons (PEPs).

1 In Chile, an ideologically false invoice is the term used to describe an invoice that is issued legally, through the formal tax system, but that does not correspond to a real operation or lacks documentary support for said operation.



Democratic Republic of the Congo

Democratic Republic of the Congo (DRC) is one of the world's major mining countries, yet corruption and conflict have severely limited the benefits from this sector for citizens. Alongside major copper and cobalt reserves, DRC holds one of the world's largest untapped hard-rock lithium deposits, around the town of Manono in Tanganyika province. The development of this deposit could lead to DRC becoming a significant player in the lithium sector, but allegations of corruption and drawn-out legal battles, as outlined by the CSO Resource Matters, have followed the project, as several foreign companies have sought exploration permits in partnership with the state-owned enterprise (SOE) Cominière.

Corruption risk case: In 2016, Cominière, one of DRC's state-owned mining firms, created a new lithium mining joint venture (JV) to hold the rights to the Manono project. A majority stake went to Dathomir Mining, a shell company with no mining experience. Dathomir never paid Cominière the agreed USD6 million fee for the rights, most of which it re-sold within two months to AVZ Minerals, an Australian company, for an estimated USD 28 million profit. Investigations by non-governmental organizations and the media alleged that Dathomir was owned by figures linked to corruption scandals from the previous government. As of February 2026, Dathomir has not responded to these allegations. In a response on 17 December 2025, Cominière described the transfer from Dathomir to AVZ as taking place under the 'most opaque conditions possible'. Cominière also stated that there was no irregularity in the transfer of the state's shares in the JV after AVZ entered the JV's capital.

Separately, in 2021, Cominière sold a 15 percent stake in the same lithium venture to a Chinese firm, Zijin Mining. A report by the Inspection Generale des Finances—DRC's highest institution monitoring and assessing public finance decisions and policies—estimated that Cominière undervalued the equity sold to Zijin by USD120.7 million. As part of the sale, Zijin also paid a commission of USD1.6 million to Focus Plaidoirie, a consultancy firm reportedly owned by a close advisor of DRC President Félix Tshisekedi at the time of the deal. The advisor was nominated president of the Cominière board in August 2023, and took up the role in September that year.

In 2023, the Congolese government revoked AVZ's license and split the original permit, later awarding rights to Manono North to a Cominière-Zijin JV (Manono Lithium SAS), which has announced it will start commercial production in 2026. Manono South belongs exclusively to Cominière. These decisions have been contested in an ongoing arbitration procedure between the Congolese State (and Cominière) and AVZ over ownership, keeping Manono South undeveloped.

Corruption red flags:

- A company with little-to-no experience wins an award
- Involvement of PEPs
- Award process does not follow existing rules or guidelines
- Favoritism in SOE licensing and contracting.



Namibia

Mining is a cornerstone of Namibia's economy, with the country's lithium ambitions currently focused on the Uis tin mine site, amid other potential projects. In February 2026, the European Investment Bank entered into a cooperation agreement with Uis Tin Mining Company to support expansion into lithium production. However, the country has faced criticism over the governance of its mining sector, and is one of the few countries in the region that has not yet joined the Extractive Industries Transparency Initiative.

Corruption risk case: In Namibia, reporting by investigative journalists and NGOs has alleged that Xinfeng Investments used bribery and fraud to acquire rights to mine for lithium near the town of Uis. The case revolves around Xinfeng's

2022 purchase of Namibian firm Orange River Mining, which held a lithium license at the time. According to allegations reported by Global Witness, a minority owner in Orange River who had family ties to a senior official in the Ministry of Mines and Energy filed false paperwork removing the company's majority shareholder, to pave the way for the sale to Xinfeng. The company reportedly paid NAD50 million (USD2.6 million) for control of Orange River, plus a separate NAD18 million (USD300,000) to the family member. The Ministry granted Xinfeng a fresh license soon after it acquired Orange River.

While all actors involved deny any wrongdoing, Xinfeng has gone on to face further allegations of poor business practices. For instance, in 2023, the Ministry of Mines and Energy temporarily revoked the company's license, claiming Xinfeng committed fraud by submitting false and misleading technical paperwork. The High Court agreed. The company has also reportedly avoided paying government fees and conducting an environmental impact assessment by operating under the wrong type of permit. Conditions for workers at the mine are allegedly poor. A delegation of Namibian parliamentarians who visited the mine in May 2022 claimed that workers were subject to "apartheid-era" living conditions and inadequate sanitation facilities. Xinfeng has stated that it is committed to prioritizing the well-being and safety of its employees.



Corruption red flags:

- Involvement of PEPs
- Award process does not follow existing rules or guidelines
- An official intervenes in the award process to benefit a particular company.



Portugal

Portugal has some existing small-scale lithium production associated with the ceramics industry, but holds the largest lithium reserves in the European Union, according to the latest data from the U.S. Geological Survey.

This has led to efforts to develop a large-scale open pit mine in the Barroso region, in the north of Portugal, led by a UK-based company, Savannah Resources. However, the project has been mired in controversy, with numerous complaints surrounding transparency and access to information, and an NGO lawsuit challenging the European Commission's decision to designate it a "strategic project" under the Critical Raw Materials Act.

Corruption risk case: In November 2023, Portugal's then-Prime Minister Antonio Costa resigned amid a high-level corruption probe, named Operation Influencer, comprising separate enquiries into a data center construction project, a hydrogen power plant and two lithium exploration concessions (both in the Barroso region). The Public Prosecutor's Office was reported as noting that several individuals allegedly took steps to influence decision-makers at different stages in the process. In total, there are eight defendants in the Operation Influencer probe, many connected to the former Costa government. These include his Chief of Staff, the Minister of Infrastructure, the President of the Portuguese Environment Agency, and a lawyer and business consultant who is a friend of Costa. Public information about details of the allegations against these defendants is limited, but they center on charges of malfeasance, corruption of elected officials and influence peddling. As of February 2026, these investigations are ongoing, with issues raised about access to evidence. Concerns have also been raised about conduct of the investigations, including wiretaps made without court approval and mistakes made in wiretap transcripts.

Former Prime Minister Costa has not been charged as part of this probe, although it was reported that the Attorney General released a statement on the day of Costa's resignation declaring that he would be investigated independently by the Supreme Court of Justice over suspicions that he "unblocked" procedures regarding the lithium mine and hydrogen plant deals. As of February 2026, no charges have been brought against him, although the investigation remains open.

Since 1 December 2024, Costa has served as President of the European Council.

Corruption red flags:

- Involvement of PEPs
- An award process does not follow existing rules or guidelines
- An official intervenes in the award process to benefit a particular company.



Zimbabwe

With the largest lithium reserves in Africa, Zimbabwe has become one of the continent's most important producers. Lithium projects have attracted significant foreign investment, particularly from Chinese companies. Yet a Transparency International assessment identified key governance risks associated with the growing sector, including a lack of clear timelines in granting awards, the risk of political interference, compromised community participation, undisclosed environmental impact assessments, and rent-seeking. In addition, a 2022 government ban on the export of raw lithium ore has been undermined by smuggling and illicit trade.

Corruption risk case: A Global Witness investigation from 2023 highlighted that, despite an official ban on unprocessed lithium exports, the politically connected Sandawana mine appears to have been exempted, trucking thousands of tonnes of ore out of the country during 2023. Sandawana was a well-known emerald mine before lithium was discovered. It was reported in November 2022 that the Zimbabwe Miners Foundation (ZMF), a body established to work with artisanal miners, received a lease over Sandawana. Yet the President of the ZMF, who is the niece of Zimbabwean President Emmerson Mnangagwa, has been implicated in corruption and money laundering in the country's gold sector.

Global Witness identified documents that indicate that large amounts of lithium ore were being trucked from the Sandawana mine into South Africa. They stated that in September 2023, Kuwimba Mining House trucked 30 tonnes of lithium ore with a grade of 2 percent to a Johannesburg minerals trader called Related to Earth (Pty) Ltd, via the Minerals Marketing Corporation of Zimbabwe (MMCZ)—a body under sanction by the U.S. Treasury from 2008 until March 2024. MMCZ has also facilitated at least 14,000 tonnes in lithium ore exports from Sandawana to Mozambique, with documents seen by Global Witness indicating that all the ore was ultimately destined for China. More recent reporting indicates that lithium smuggling remains a problem for the country; an April 2025 undercover Oxpeckers investigation into the topic revealed widespread bribery and use of middlemen at the border with Mozambique.

Corruption red flags:

- Involvement of PEPs
- Involvement of an individual with a history of criminality or controversy
- Smuggling and money laundering.

These international cases demonstrate that lithium projects elsewhere have faced many well-known corruption risks. Elite interests may distort the development of projects, as laws designed to protect the country's interests are breached and ill-suited companies enter the sector. For prospective lithium producers, the identified risks center on the licensing process. Yet the cases of Chile and Zimbabwe underscore that corruption can also take place when production is underway. For Ghana, there are important lessons to take from these examples, such as ensuring that decision-making is not undermined by undue political influence or the presence of politically connected actors in the awards process, and supporting well-resourced, independent enforcement of anticorruption laws.

What corruption red flags have arisen in the rest of Ghana's mining sector?

With Ghana's lithium sector yet to enter production, there is limited direct evidence on what corruption—if any—has taken place in the sector. Yet cases from elsewhere in Ghana's mining sector may provide pertinent warnings about the kinds of licensing and revenue corruption risks that anticorruption actors should be vigilant for.

1) In 2016, Exton Cubic Group, a company controlled by the brother of outgoing President John Mahama, received rights to the country's largest bauxite concession a week before the government changed hands. Many critics pointed to the timing of the licenses as inappropriate, raising concerns that the connection to the president's brother means that favoritism or nepotism were at play in decision-making. In 2019, the Supreme Court ultimately ruled that the three licenses held by Exton Group Limited were invalid. With the political and legal battles that have followed this case keeping three quarters of reserves in limbo, such controversies may be undermining Ghana's bauxite potential.

Corruption red flags:

- Favouritism in licensing processes and decisions
- Involvement of PEPs
- Award process does not follow existing rules or guidelines
- Questionable timing of the award of licenses—immediately before or after a general election.

2) In April 2025, the Office of the Special Prosecutor brought corruption charges against a former secretary of the now-defunct Inter-Ministerial Committee on Illegal Mining, which was tasked with vetting and verifying artisanal and small-scale mining companies, but was disbanded in 2021 due to corruption allegations. According to charges filed by the Office of the Special Prosecutor, the official allegedly accepted bribes during 2019 to expedite the license renewal process for the company ORR Resources Limited, without required documentation. Corruption charges were also brought against a businessman for facilitating the payments. In May 2025, both initially pleaded not guilty to the charges. However the businessman was later convicted after entering a plea deal. The case against the official is ongoing.

Corruption red flags:

- Bribery, payments or favors to influence decisions
- An official intervenes in the award process to benefit a particular company
- An intermediary is used to gain advantage in the award process.

3) In December 2016, Cassius Mining Limited was granted a gold prospecting license in the Talensi District of Ghana's Upper East Region. Yet researchers from the CSO Northern Patriots in Research and Advocacy identified that the Australian beneficial owners of the company had been convicted for several crimes in their home country, including fraud, market manipulation, unprofessional conduct and breach of duty. The Minister for Lands and Natural Resources instructed the Minerals Commission not to renew the license in January 2020, citing a failure to disclose these convictions. In December 2024, Cassius Mining filed a case against the Ghanian government in the London Court for International Arbitration, for alleged breach of contract. The final hearing is scheduled for June 2026.

   While this case showed the utility of beneficial ownership disclosures in identifying where high-risk individuals are involved in projects, and the crucial role that CSOs can play as accountability actors, it also raises questions about the extent of due diligence carried out on the company before the license was granted.

Corruption red flags:

- A company with a history of criminality or controversy wins an award.

4) In 2025, Akonta Mining Company Ltd had its licenses revoked for allegedly operating unlawfully in forest reserves, despite lacking the necessary permits. An investigation by the Minerals Commission alleged that Akonta Mining had been subleasing concessions to individuals operating under false pretenses, in return for the payment of weekly royalties in gold to the company. Payments in gold could enable companies to evade tax obligations and launder profits from illegal mining. The company is owned by a political party official from the previous government, who is facing six criminal charges.

   Illegal mining causes significant damage to Ghana's natural environment. The Ghana Coalition Against Galamsey ("galamsey" being the local term for illegal small-scale gold mining) has called for accountability in the case, citing pollution of major water bodies like the Tano River and damage to the Tano Nmiri Forest Reserve.

Corruption red flags:

- Collusion or manipulation to influence awards processes
- Smuggling and money laundering
- Manipulation of factors that determine revenue obligations.

5) Ghana's Minerals Income Investment Fund (MIIF) was established through a 2018 Law with the objective of managing mineral royalties and other equity holdings from Ghana's mining sector. However, the MIIF has not been free from criticism. In November 2025, the Office of the Special Prosecutor announced that a major corruption probe into the MIIF had reached advanced stages, and that it had already frozen accounts, seized assets and placed restrictions on the movement of some individuals as part of the ongoing investigation. The probe centers on a gold-trading arrangement and allegations that the state may have advanced USD94 million for gold purchases that were not fully delivered.

Corruption red flags:

- Embezzlement or misappropriation of funds.

Taken together, these cases highlight how vulnerabilities across Ghana's mining sector—from politically connected licensing and bribery, to weak due diligence, unlawful operations and alleged misappropriation of public funds—underscore the urgent need for stronger oversight, greater transparency and more consistent enforcement of the rules. They show how corruption risks can distort decision-making, undermine responsible investment, fuel environmental harm, and ultimately deprive citizens of the full benefits of the country's mineral wealth. As Ghana prepares for new opportunities in critical minerals like lithium, these lessons offer a clear reminder that safeguarding integrity in the sector is not optional, but is essential for securing public trust and ensuring that future resource development truly serves the national interest.



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Where are the highest risks of corruption in Ghana's lithium sector?

Mineral production involves a number of complex interactions between the public and private sectors, each of which generates specific opportunities for corruption. Given the current state of developments in Ghana's lithium plans, and lessons from other producers and elsewhere in the country's mining sector, we see licensing and revenue collection and management as key potential risk areas for anticorruption stakeholders to be aware of.

Licensing: With high stakes at play, NRGI's research has shown that licensing is one of the riskiest stages of the decision-making chain in terms of corruption. This may take place through bribery, favoritism or collusion during awards processes; the manipulation of environmental and social impact assessments and community consultations; or undue private influence over the laws and regulations that govern awards processes. The consequences can be severe: citizens and communities denied a fair share of the benefits of mining; companies empowered to neglect or harm vulnerable populations and ecosystems with impunity; and significant delays to production.

Ghana has awarded only one lithium license, and the process has not been without controversy. In 2023, a Texas-based short seller[2] made an accusation that Atlantic Lithium's partner gained the lithium licence in 2021 by acquiring a company owned by the son of the Chairman of Ghana's Parliamentary Mines and Energy Committee. The short seller, which stood to benefit financially from a declining Atlantic Lithium share price, alleged that Atlantic Lithium paid the owners of the company USD730,000 in stock and promised a 2.5 percent production royalty potentially worth tens of millions of dollars, and that the company acquired held the rights to a lithium concession. However, there has been no evidence of criminal investigations, and Atlantic Lithium has denied any wrongdoing. Nonetheless, the existence of such allegations suggest that Ghana's lithium potential is a topic of interest for investors from around the world, and they raise questions about the scope for conflicts of interest in the sector.

Revenue collection and management: The ways in which the government collects and manages revenues in the mining sector are a crucial point of interest for anticorruption activists. Corrupt actors may resort to bribery or other forms of undue influence to secure favorable fiscal terms or treatment, or may manipulate sovereign wealth funds or other savings and investment vehicles for corrupt ends. When corruption takes place at these decision points, much-needed revenues are lost. This can have a major impact on the provision of public services, like education and health care, and essential infrastructure, for both present and future generations.

Although Ghana's lithium sector is in its infancy, the royalty rate and the factors influencing it have been a topic of public discussion. Atlantic Lithium's first agreement had a royalty rate of 10 percent awaiting parliamentary ratification before the change of government in January 2025. The new agreement, renegotiated at the request of Atlantic Lithium, had royalties reduced to 5 percent, citing the downward trend of lithium prices and impacts on production costs. Civil society advocacy efforts resulted in the government agreeing to a sliding scale royalty model, which has subsequently been codified into law, that adjusts rates to price changes. There is no evidence of wrongdoing on the part of the company, but the absence of legal backing for the country's royalty regime before negotiation of the agreement created room for influence in the negotiations.

2 Short selling is a trading strategy where investors speculate on a stock's decline, betting on (and thus profiting from) a drop in the security's price.

What risk factors could make corruption more likely to occur in Ghana's lithium sector?

A lack of transparency: Corruption thrives when there is scope for it to remain hidden, and a lack of publicly available information makes it harder for anticorruption actors to identify when wrongdoing has occurred. CSOs have raised concerns about significant transparency deficits in the process for issuing mining licenses in Ghana. For example, the Minerals Commission's online repository of mining licenses fails to provide clear maps, approval dates and company details of license holders. In the first week of 2025, the Commission issued 318 mining-related licenses without adequate disclosures, although the new government reviewed and revoked the majority of licenses a few months later.

Weak oversight and enforcement: Laws may be in place to ensure good practice, but they are only effective if actively enforced. Too often, enforcement agencies are hampered in these efforts through a lack of funds, independence or necessary powers to tackle allegations of corruption or other forms of harm in the sector. In Ghana, anticorruption actors have also argued that political interference has limited the ability of the Minerals Commission and other oversight actors to sanction mining companies that are affiliated to incumbent governments. For example, in the Akonta Mining case outlined above, the Ghana Coalition Against Galamsey raised concerns that delays to prosecution suggested political interference. This should prompt the country to consider prohibitions against politically exposed persons from active engagement and affiliation with mining companies, given the evidence for their incapacitation of state efforts in fighting corruption.

Insufficient public participation: Local communities and civil society actors play a crucial role in identifying potential problems in any mining project; they know the land, the ecosystem that depends on it, and how their own needs may be impacted. Yet too often they are unable to fully participate in licensing decision-making, either due to insufficient legal protections, or to intentional efforts to exclude them or encumber them with bureaucratic or inaccessible processes. In Ghana, the public has raised concerns that there is insufficient oversight and engagement during environmental impact assessments and community consultation processes prior to license issuance.

Conflicts of interest: Fair competition is crucial to counteract favoritism and an uneven playing field that benefit narrow interests. In Ghana's mining sector, political and business elites have been shown to influence license issuance and enforcement. During the 2017–2024 "war on galamsey," senior officials and politicians were implicated in protecting illegal mining operators, creating an uneven landscape in which well-connected entities thrived, while others were penalized. In February 2026, the government's spokesperson indicated that perpetrators will be dealt with in response to widely publicized reports that current local government officials were participating in and enabling illegal mining activities. The coming months will reveal whether these indications lead to full investigations.

Involvement of foreign actors: Foreign enablers can often help corruption schemes to function and may facilitate the flow of stolen money outside the country. As access to minerals becomes a greater topic of geopolitical competition, the involvement of foreign actors can add an extra layer of complexity that may impede accountability for wrongdoing. This has been an important topic of conversation for Ghana—for example, around the role of Chinese nationals financing and operating illegal mining sites.

Actors may also appeal to foreign connections to gain favor, as in the controversy that has surrounded Ghana's Bogoso Prestea gold mine. When the existing operator lost its license in 2024, an influential factor in the selection of the preferred bidder was reportedly that it was a subsidiary of Yilmaden, the mining arm of Turkey's Yildirim Group, with access to significant capital. However, questions have since been raised about whether this is true, with the company reportedly not listed among Yildirim's subsidiaries. The company that lost the license subsequently mounted a legal challenge, which was struck down by the Supreme Court in November 2025.



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Conclusion

Ghana is no stranger to the challenges that corruption in mining can create. From facilitating illegal gold mining in forest reserves, to machinations over bauxite licenses at the highest levels of power, there are ample cautionary tales about how corruption can undermine the country's ambitions to use its mineral resources for sustainable development. Yet there are also clear examples of Ghanaians working hard to ensure that wrongdoers are held to account, whether through digging into beneficial ownership data or pushing for robust, independent enforcement of anticorruption laws.

NRGI has prepared this briefing to inform stakeholder discussions on priority reforms to ensure that Ghana's lithium sector is not hampered by corruption. It builds on work we have carried out in recent years to support anticorruption actors to challenge weaknesses in governance in the transition mineral space. The potential reform areas below draw on suggestions taken from questionnaires completed during two transition mineral anticorruption workshops held in the Ghanaian cities of Accra and Kumasi in November 2024, weeks before the country's most recent election.

Potential reform areas:

- **Increase transparency and strengthen processes in licensing decisions:** Reform the licensing regime to ensure transparent, merit-based decision-making on awards, full public disclosure of mining contracts, integration of beneficial ownership information into decision-making, parliamentary approval of leases, and meaningful involvement of communities in licensing decisions.
- **Increase digitisation:** Establish an independent, digitized mining cadastre with public access and audit trails to track license issuance, renewals, transfers and termination; land allocation; mineral production and revenue flows, and integrate digital systems across regulatory and revenue agencies.
- **Strengthen enforcement:** Address politicized decision-making in enforcement and regulatory bodies through measures to strengthen independence, improve resourcing for regulators, increase prosecution rates for illegal and non-compliant operators, and improve on-site monitoring and compliance checks.

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