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Meaningful stakeholder engagement as a tool for accountability in the mineral industry

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ABSTRACT

Meaningful Stakeholder Engagement (MSE) has become a central pillar of accountability in the mineral industry amid growing scrutiny of corporate responsibility, environmental harms and human rights. This paper examines how engagement with host communities, state institutions, civil society organizations and investors shapes accountability outcomes in Ghana's mining sector. Drawing on qualitative fieldwork and informed by global governance frameworks—including the UN Guiding Principles on Business and Human Rights and the European Union's Corporate Sustainability Due Diligence Directive—the study finds that although engagement is now formally embedded in mining governance, its practice remains largely procedural, uneven and often ritualistic. Such approaches limit communities' ability to exercise voice, demand answerability and secure equitable developmental benefits from mineral extraction. At the same time, empirical evidence from community participants highlights that when engagement is grounded in the principles of MSE—particularly inclusiveness, transparency and responsiveness—it can enhance local capacity to contest decisions and influence resource governance. The paper argues that advancing accountability requires moving beyond tokenistic consultations towards engagement processes that explicitly address power asymmetries and meaningfully incorporate community actors into decision-making. It concludes that substantive stakeholder engagement, reinforced by robust regulatory frameworks and genuine participatory commitments, is critical to achieving accountable and sustainable mineral governance in Ghana.

1. Introduction

The mineral industry—spanning large- and small-scale extraction—remains a focal point of global debate due to its intertwined economic, social and environmental consequences. While mining contributes significantly to economic growth and employment, it is also associated with environmental degradation, community displacement and human rights violations, often linked to irresponsible extraction practices (Goodland, 2012; Gyan, 2019; Mutti et al., 2012; Owusu, 2021). These enduring challenges have intensified calls for stronger mechanisms of corporate accountability within extractive governance (Dashwood, 2012; Mutti et al., 2012).

Within this context, Meaningful Stakeholder Engagement (MSE) has emerged as a central governance concept for advancing accountability and responsible business conduct in the extractive sector. Early scholarship highlights the role of dialogue and multi-stakeholder engagement

in enhancing corporate accountability within corporate social responsibility (CSR) frameworks (Bendell, 2005; Fransen, 2012; Payne, 2004). Yet, despite extensive work on stakeholder engagement, limited empirical attention has been paid to how MSE operates in practice as an accountability mechanism in mining, particularly in developing-country contexts characterized by power asymmetries and weak regulatory enforcement.

Contemporary interest in MSE is increasingly shaped by its incorporation into Risk-Based Due Diligence (RBDD) frameworks, most notably the 2011 UN Guiding Principles on Business and Human Rights (UNGPs) and emerging mandatory due diligence regimes such as the 2024 EU Corporate Sustainability Due Diligence Directive (CSDDD). Within these frameworks, stakeholder engagement is normatively positioned as a procedural expectation through which companies identify and address adverse social and environmental impacts (Buhmann et al., 2024; Camilleri, 2015). This has elevated MSE from a voluntary

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governance tool to a central element of accountability-oriented business conduct, underpinning its prominence in current scholarly debates.

While the concept of MSE is widely invoked, it remains analytically contested. Guided by this ambiguity, the study conceptualizes MSE as a process through which organizations engage affected and relevant stakeholders to negotiate social and environmental impacts and to generate expectations of accountability and responsiveness (Andriof and Waddock, 2017; Jeffery, 2009; Kujala et al., 2022). Recent contributions, including *The Routledge Handbook on Meaningful Stakeholder Engagement* (Buhmann et al., 2024), conceptualize MSE as both a normative principle and a management practice, integrating insights from stakeholder theory, business and human rights, and impact assessment.

For the purposes of this study, MSE is understood as the routine and substantive interaction with stakeholders—those who affect or are affected by business decisions—where organizations demonstrate openness to adapt practices based on stakeholder feedback (Kujala et al., 2022). In other words, MSE is an approach to engagement in which processes are deliberately designed and implemented to avoid tokenism, ensuring that participants possess the practical capacity and institutional space to contribute meaningfully and, where appropriate, shape decisions and governance outcomes (Mercer-Mapstone et al., 2019). Arnstein's (2019) classic articulation reinforces this point, stressing the critical distinction between symbolic rituals of participation and processes where community members wield genuine power to shape outcomes. Against this backdrop, MSE involves interactive routine processes with relevant stakeholders, characterized by two-way communication and grounded in the good faith of all participants, forming a core component of responsible business conduct and effective due diligence (Buhmann et al., 2024; Häberlein and Hövel, 2023). In this sense, MSE is not only a tool for securing social license to operate, but also a framework for embedding accountability in resource governance.

This paper, therefore, examines MSE as a tool for accountability in Ghana's mining sector, where questions of equity, participation and responsibility remain particularly acute. Drawing on qualitative fieldwork and the perspectives of affected communities and institutional actors, the study assesses how engagement is experienced in practice and the extent to which it facilitates or undermines answerability, responsiveness and enforceability in mineral resource governance.

The remainder of the paper is structured as follows. The next section reviews the theoretical foundations of MSE and its intersections with institutional accountability in the extractive sector. This is followed by an outline of the research design and methods employed in the fieldwork conducted in Ghana. The subsequent sections present and analyze the findings, connecting empirical insights with the theoretical and conceptual debates. The paper concludes with a summary of key findings and recommendations for strengthening accountability through meaningful engagement in extractive governance.

2. Conceptual framework and literature review

2.1. Meaningful stakeholder engagement (MSE): state of the literature

Meaningful Stakeholder Engagement has become increasingly central to debates on governance, accountability and sustainability in resource-dependent economies. In contrast to tokenistic or procedural approaches—which often reproduce power asymmetries under the guise of consultation (Andriof and Waddock, 2017; Jeffery, 2009; Kujala et al., 2022)—MSE emphasizes engagement practices grounded in reciprocity, deliberation and the substantive incorporation of stakeholder voices into decision-making (Buhmann et al., 2024). It is both normative, advancing principles of justice, equity and participation, and instrumental, offering practical mechanisms for conflict management, organizational legitimacy and governance effectiveness (Reed et al., 2018). Conceptually, MSE reframes participation not as a compliance exercise, but as constitutive of sustainable development and accountable

governance.

Against this backdrop, MSE is best understood as a deliberate, dialogic and relational governance process, rather than a routinized form of consultation. Meaningfulness is not generated by the frequency of engagement or assumptions of good faith on the part of affected stakeholders, but through the design of inclusive engagement processes that build on trust over time, enable two-way deliberation and allow stakeholders to influence both how participation is structured and how decisions are justified (Buhmann et al., 2024; Mercer-Mapstone et al., 2019). From this perspective, MSE is not a “guidance” instrument, but a core procedural element of risk-based due diligence for responsible business conduct, insofar as it enables the identification, prevention and management of adverse social and environmental impacts through sustained interaction with affected stakeholders. This process-oriented understanding moves MSE beyond formal compliance, foregrounding its role in generating answerability, responsiveness and ultimately accountability in extractive governance.

In this study, the “meaningful” dimension of MSE is treated as a processual property, rather than a discrete event or procedural requirement. Meaningfulness is sustained when stakeholders are involved not only at moments of consultation but throughout the engagement trajectory, including the design of engagement processes, decision-making, implementation and follow-up (Deverka et al., 2012). From this standpoint, MSE is meaningful only insofar as it enables continuity, influence and feedback across the full lifecycle of extractive projects, rather than participation at isolated stages.

Recent scholarly interest in MSE has been significantly shaped by its incorporation into risk-based due diligence frameworks, particularly the UN Guiding Principles on Business and Human Rights (UNGPs) and the EU Corporate Sustainability Due Diligence Directive (CSDDD) (Buhmann et al., 2024; Ruggie, 2011). Within these frameworks, MSE is positioned as a procedural expectation through which companies identify, prevent and mitigate adverse social and environmental impacts. However, a growing body of critical scholarship cautions that formal alignment with due diligence requirements does not necessarily translate into meaningful accountability outcomes, especially in contexts characterized by entrenched power asymmetries and weak enforcement (Häberlein and Hövel, 2023).

At a basic level, stakeholder engagement refers to processes through which organizations involve actors who affect or are affected by their operations (Freeman 1984; Reed et al., 2018). Empirical studies in extractive contexts, however, consistently show that engagement is frequently ritualistic, dominated by information dissemination or narrowly framed consultations that exert minimal influence over decisions (Aakhus and Bzdak, 2015; Adams et al., 2023). For instance, Atkinson and Alibašić (2023) demonstrate that participant selection in climate governance often serves regulatory compliance rather than reflecting community interests. Similarly, some research shows that extractive governance decisions in developing societies replicates colonial logics of control and exclusion, which alienate vulnerable local voices (Faanu, 2026; Murrey and Mollett, 2023). Furthermore, Mercer-Mapstone et al. (2019) show that mining companies typically retain control over who participates, a dynamic that reinforces corporate power and privilege. These patterns underscore the analytical importance of MSE as a corrective measure to extractive governance dominated by proceduralism rather than substantive accountability.

Recent debates further emphasize that the “meaningful” component of MSE requires closer conceptual attention (see various chapters in Buhmann et al., 2024). Beyond shaping outcomes, meaningfulness increasingly refers to stakeholder involvement in shaping the engagement process itself, including agenda-setting, timing, modes of participation and rules of interaction. Under this interpretation, engagement is meaningful not only when stakeholder input affects decisions, but when stakeholders exercise genuine influence over how participation is designed and conducted. This distinction is critical as engagement processes that are procedurally formalized yet externally designed may

satisfy due diligence requirements while remaining substantively exclusionary in practice.

The literature thus reflects two overlapping but distinct conceptions of MSE. One conception—closely associated with risk-based due diligence frameworks under the UN Guiding Principles on Business and Human Rights and the EU Corporate Sustainability Due Diligence Directive—understands MSE primarily as a procedural mechanism for identifying and mitigating risk. A second, broader conception—rooted in stakeholder theory, participatory governance, deliberative democracy and political ecology—conceptualizes MSE as a relational and process-oriented practice that foregrounds power, inclusion and co-production, often independent of formal due diligence regimes. While these strands increasingly intersect, they rest on different assumptions about participation, authority and accountability. This study draws on the latter perspective to assess whether engagement processes in Ghana's mining sector enable stakeholders to shape both engagement processes and accountability outcomes.

Stakeholder theory provides a foundational lens for understanding these dynamics. Freeman's (1984) typology distinguishes between primary stakeholders—such as shareholders, employees and governments—and secondary stakeholders, including communities and civil society actors. While influential, this framework has been widely critiqued in resource governance contexts. In Ghana, for example, land tenure systems vest land ownership in families and communities, while the state holds custodial rights over subsoil resources (Kasanga and Kotey, 2001). This institutional configuration renders rigid distinctions between “primary” and “secondary” stakeholders analytically unstable. Communities cannot be treated as peripheral actors when they exercise direct claims over land and mineral rights (Gyan, 2025). As Ofori and Arthur-Holmes (2025) argue, those most affected by mining—farmers, landowners, small-scale miners and residents—must be recognized as primary stakeholders, even in the absence of formal authority. This re-theorization highlights the limitations of universal stakeholder models and underscores the need for context-sensitive categorizations attentive to local political economies.

Building on these insights, MSE can be conceptualized as a political practice that mediates power relations among corporations, states and communities. Five interrelated dimensions characterize MSE in extractive governance. First, stakeholder identification and categorization are critical. Effective MSE requires recognizing differentiated interests, power and vulnerabilities (ESCAP, 2018; Jeffery, 2009), rather than privileging corporate convenience. Corporate-centric selection processes often reproduce inequality by favouring elites (Mercer-Mapstone et al., 2019), with hierarchical engagement structures sidelining women, youth and smallholder farmers (Spiller et al., 2025).

Second, relationship-building and trust formation are indispensable. Extractive projects are often embedded in contexts shaped by colonial legacies, dispossession and unmet promises (Butler, 2015; Faanu, 2026). Trust deficits cannot be addressed through technical fixes alone, but require sustained transparency, reciprocity and accountability (Jiang and Men, 2017). Accountability here is inherently relational as companies' willingness to justify decisions, respond to concerns and accept responsibility directly shapes whether trust is built or eroded (Braun and Busuioac, 2020; Muslim and Mais, 2023).

Third, MSE requires dialogic rather than unidirectional communication. Conventional corporate social responsibility approaches emphasize information dissemination, casting local stakeholders as passive recipients (Andrews, 2021; Osei-Kojo and Andrews, 2020). In contrast, dialogic engagement foregrounds reciprocal communication and co-produced decision-making (Phillips, 2011), enabling adaptive responsiveness and learning (Eke et al., 2024). Accountability is enacted through such deliberation, where companies must justify decisions and transparently explain constraints when stakeholder demands cannot be met (Prno, 2024).

Fourth, inclusivity and accessibility are central. Elite-dominated engagement marginalizes women, youth and other vulnerable groups

(Newell et al., 2024). Intersectional analyses show how gendered and social inequalities systematically limit influence in decision-making (Hill et al., 2016). Engagement processes that fail to dismantle these structural barriers not only constrain accountability, but also reduce participation to minimal or reactive engagement, falling short of meaningful participation.

Finally, MSE must be context-sensitive, adaptive and institutionalized through evaluation. Extractive governance is shaped by historical, cultural and political conditions (Bebbington et al., 2018), which every engagement must recognize. Over the years, research shows that universalized governance models have failed in developing contexts and undermined monitoring and accountability (Brett, 2003; Sovacool et al., 2016). Adaptive MSE frameworks thus institutionalize learning and responsiveness, aligning accountability with ongoing negotiation rather than one-off compliance (Newell and Bellour, 2002).

Taken together, the literature on MSE shows that engagement cannot be evaluated solely by its formal existence or stated intentions, but by its capacity to reconfigure power relations, shape decision-making processes and enable accountability in practice. While recent debates—particularly those informed by risk-based due diligence frameworks—emphasize MSE as a procedural requirement for identifying and managing impacts, broader strands of scholarship highlight its role as a relational and process-oriented governance practice. These perspectives converge on a critical insight that engagement becomes meaningful only when it is embedded within accountability structures that guarantee answerability, responsiveness and enforceability. Building on this insight, the next section conceptualizes accountability in the mining industry, situating it within political economy and governance debates and examining how MSE can function as a central mechanism through which accountability is enacted in extractive contexts.

2.2. Conceptualizing accountability in the mining industry

Accountability in the mining sector is a central organizing principle for equitable governance, responsible resource extraction and the protection of community rights and ecosystems (Baseda et al., 2015; Goodland, 2012). It operates as a critical counterweight to the profound power asymmetries that characterize extractive landscapes. At its core, accountability refers to the institutional, normative and political mechanisms through which state and non-state actors are expected to justify decisions, accept responsibility for harms and respond to those affected—particularly marginalized communities and fragile environments (Osei-Kufuor et al., 2024; Theisohn and Selim, 2006).

Rather than treating accountability as a singular or predominantly legalistic concept, this study engages with multiple understandings of accountability that coexist across political economy, governance, and business and human rights literatures. While some approaches emphasize ex post compliance, enforcement and sanctioning (Moldaliev, 2021; Park et al., 2024), others conceptualize accountability as a process-oriented and relational practice grounded in participation, transparency and responsiveness (Andriof and Waddock 2017; Patil et al., 2014). Building on this latter tradition, the paper advances an understanding of accountability that foregrounds MSE as a mechanism through which affected communities are involved not only in assessing impacts, but also in shaping the processes through which decisions are made and justified. This process-oriented understanding aligns with the logic of risk-based due diligence under the UN Guiding Principles of Business and Human Rights, where accountability is enacted through ongoing management processes aimed at preventing harm, identifying impacts and responding to affected stakeholders—rather than solely through post hoc enforcement or legal remedy.

From an institutionalist perspective, accountability mechanisms such as Environmental Impact Assessments (EIAs), parliamentary oversight and judicial review provide formal checks on power (Bovens, 2007; Sheate, 2012). In practice, however, particularly in developing contexts, these mechanisms frequently falter due to weak enforcement

capacity, politicized regulatory institutions and corporate influence. In Ghana and many other resource-rich countries, this has produced what has been described as a “hollowing out of governance,” where legal frameworks exist on paper, but accountability is routinely evaded in practice (Kahler and Lake, 2003, p. 437). It is within these institutional gaps that alternative and community-driven forms of accountability emerge, including civil society advocacy, grassroots monitoring and multi-stakeholder engagement platforms.

Accountability in such contexts is therefore not merely about regulatory compliance. It is equally about transparency, procedural justice and the redistribution of voice and power within systems that structurally marginalize local communities. Across the Global South, extractive governance has often been shaped by regulatory capture, elite bargaining and the prioritization of investment imperatives over social and environmental protection (Ghebremusse, 2020). Accountability thus becomes a site of political contestation, through which communities demand recognition, redress and restitution (Aboagye, 2024; Danso, 2017; Moldaliev, 2021). In this study, accountability is treated both instrumentally—as a set of governance mechanisms—and normatively—as a principle affirming the rights of affected populations to be heard and protected.

Building on Schedler et al.’s (1999) framework, we operationalize accountability through three interlinked dimensions: answerability, enforceability and responsiveness. Answerability requires that companies and state actors provide information and justification for their actions. Enforceability demands that violations trigger credible sanctions or corrective measures. Responsiveness extends beyond compliance by requiring institutions to adapt practices in response to community concerns, rather than reacting only to crises or reputational risks. Together, these dimensions shift accountability from a static, compliance-oriented notion to a dynamic governance process. As illustrated in Fig. 1, this triadic framework positions stakeholder engagement as the connective tissue through which accountability is enacted in practice.

Understanding accountability through a political economy lens further clarifies its limits and possibilities. Resource extraction is inherently political, as states often balance regulatory responsibilities against revenue dependence and investor pressures while transnational corporate structures obscure lines of responsibility across jurisdictions (Banerjee, 2018; Baseda et al., 2015). These dynamics enable the externalization of environmental and social costs onto host communities and complicate traditional accountability pathways.

In this context, we advance a broader accountability framework

anchored in three mutually reinforcing elements. First, participatory governance, where affected communities play an active role in shaping both the rules and outcomes of mining operations (Spiller et al., 2025). Second, social license to operate, which reframes legitimacy not as a legal entitlement but as a conditional and revocable form of community trust (Demuijnck and Festerling, 2016). Third, procedural justice, which ensures that decision-making processes are transparent, inclusive and attentive to context-specific power relations (Lemke et al., 2024). This framework does not reject legal accountability but situates it alongside process-based and relational forms of accountability that are essential in extractive contexts marked by inequality and institutional fragility.

Collectively, this framework positions MSE as the central mechanism through which accountability is enacted in practice. Rather than treating accountability as an abstract governance outcome, the analysis conceptualizes answerability, responsiveness and enforceability as relational processes that are produced or undermined through engagement practices. The empirical analysis in Section 4 therefore examines how different forms of stakeholder engagement shape the quality of accountability in Ghana’s mining sector, and how failures of engagement translate into accountability deficits.

Finally, we situate accountability within Freeman’s (1984) stakeholder theory, arguing that accountability and stakeholder engagement are mutually constitutive. Without credible accountability mechanisms, engagement risks becoming symbolic or tokenistic. Conversely, engagement strengthens accountability when it creates feedback loops that translate community input into corporate and policy action (Andriof and Waddock, 2017). Mechanisms such as public hearings, community scorecards and participatory audits transform accountability from a reactive posture into a proactive governance strategy, enhancing legitimacy, reducing conflict and supporting long-term stability in the mining sector (Reed et al., 2009).

3. Research design, case selection and methodology

The data for this paper is drawn from a broader research project examining extractive governance and accountability in Ghana. The study adopts a qualitative comparative case study design to explore stakeholder engagement as a tool for accountability in Ghana’s mining industry. The selected cases include Golden Star Resources Ltd (GSR Wassa), Cardinal Namdini Mine (CNM), Perseus Mining (PM) and Newmont Ahafo Mine (NAM), and the catchment communities. These mines are in the Western, Upper East, Central and Ahafo regions, respectively. By exploring these cases, the study seeks to understand

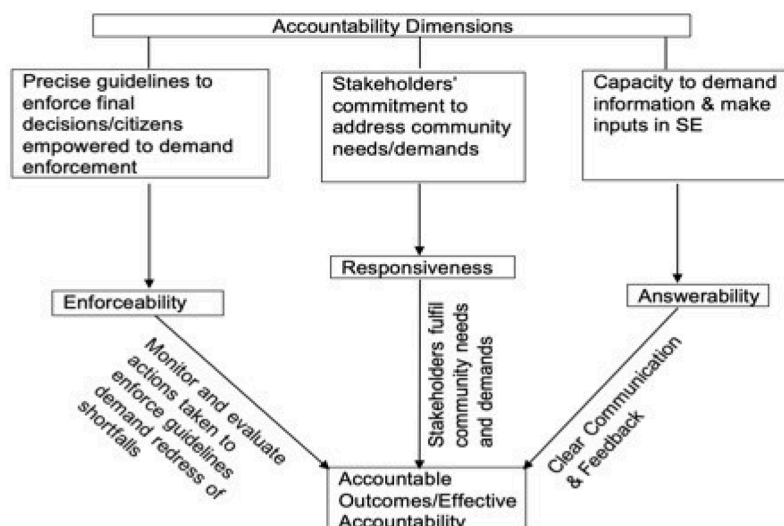


Fig. 1. Accountability from stakeholder engagement.
Source: Authors (2025)

how stakeholder engagement processes serve as a platform for answerability to local communities' questions or concerns, responsiveness to their needs and enforceability of mining regimes and laws that govern the industry.

3.1. Case selection

The selection of Golden Star Resources Wassa, Newmont Ahafo Mine, Cardinal Namdini Mine and Perseus Mining as comparative cases is purposeful and strategic. All cases represent major players in Ghana's gold mining sector but differ in scale, governance approaches and community engagement histories. While Newmont Ahafo Mine operates as a large-scale transnational corporation with a long-standing corporate social responsibility (CSR) framework, Golden Star Resources Wassa Mine represents a mid-tier operator with evolving governance mechanisms. On the other hand, Cardinal Namdini Mine, a relatively new entrant backed by foreign investment, is in the early stages of operationalizing its social and environmental commitments, navigating regulatory frameworks while shaping its local legitimacy. In contrast, Perseus Mining represents a West African regional operator with prior experience in Côte d'Ivoire, bringing a more standardized but externally driven model of engagement that is currently being adapted to Ghana's socio-political context.

Specifically, all cases are purposively selected based on the following criteria: their high-profile roles in Ghana's gold mining sector and visibility of stakeholder engagement practices, contrasting corporate structures and business culture (e.g. whereas Newmont Ahafo Mine and Perseus Mining are democratic and liberal in their mining operations and community engagement, GSR Wassa and Cardinal Namdini Mine are more "closed" and illiberal in their operations and community engagement). The case selection also reflects regional and geographical balance and different governance and cultural settings. While Cardinal Namdini Mine is in the northern part of Ghana, Newmont Ahafo Mine is in the middle belt, and Perseus Mining and Golden Star Resources Wassa are located in the southern belt of Ghana. The contrast and similarity allow for an analytical comparison of institutional approaches and socio-political effects on stakeholder engagement and its efficacy in achieving accountability. These most-different and most-similar systems design enhance the analytical leverage (Gerring and Cojocaru, 2016) for drawing lessons about how varying actors affect stakeholder engagement as a tool of accountability.

3.2. Data collection

The study draws on a cumulative 12 months of fieldwork, conducted in two phases (January–April 2023 and May–December 2024). Data collection employed a qualitative multi-method approach, combining semi-structured interviews, focus group discussions (FGDs), participant observation and grey documents review, enabling triangulation across methods and stakeholder perspectives. Interview and FGD design were explicitly informed by the study's conceptualization of MSE and accountability.

Semi-structured interviews were conducted to explore the forms and format of stakeholder engagement, focusing on the principles of answerability, responsiveness and enforceability. These interviews involved diverse group of key informants, including chiefs, queen mothers, community leaders, officials from the Ghana Minerals Commission, Environmental Protection Agency and Lands Commission, as well as representatives from civil society and community-based organizations, local government officials, assembly members and representatives from the selected mining companies.

Participants were purposively sampled based on their institutional roles and involvement in mining-related governance and local-level stakeholder engagement. Across all cases, the broader project conducted 104 interviews alongside eight FGDs (see Table 1), providing in-depth insights into stakeholders' experiences and perceptions of

Table 1

Distribution of interview participants.

No.	Stakeholder Group	Number of Interviewees
1	Government and elected officers	16
2	Mining company officials	10
3	Traditional Authorities	12
4	Youth and Community/Opinion Leaders	53
5	Civil Society Organizations/advocacy groups	13
Total		104
Number of segregated Focus Groups		Number of Participants
4 Men		7 for each group
4 Women		8 for each group

accountability in the mineral sector.

The relatively higher representation of youth and community leaders in the sample reflects both the governance structure of mining-affected communities and the study's purposive sampling strategy. Youth groups and community leaders frequently act as primary intermediaries and advocates between mining companies and local residents but are often disproportionately involved in consultation processes, grievance negotiations and community-company engagements. Hence, the sampling composition reflects stakeholder salience within local mining governance, rather than an unintended sampling imbalance.

The eight FGDs were held in four mining communities, comprising four women's groups and four men's groups. Gender-segregated FGDs were used to create safe and inclusive spaces for open discussion, particularly on sensitive issues related to gender equality, representation and power relations. Also, this approach was used primarily to surface gender-specific experiences of stakeholder engagement and accountability rather than to generate a formal comparative analysis. However, where relevant, gendered differences are emphasized in the analysis. Existing research demonstrates that mixed-gender focus groups can inhibit participation due to intimidation or dominance by male participants (Nyumba et al., 2018; Gupta et al., 2024). Each FGD lasted approximately 60 min and included seven to eight participants.

In addition, participant observation was undertaken through attendance and systematic notetaking at community consultative committee meetings and other engagement forums during the fieldwork period. All interviews and FGDs adhered to approved ethical protocols. Informed consent was obtained prior to audio-recording to ensure participants understood the purpose of the research and agreed to recording of their contributions, thereby enhancing the accuracy, completeness and reliability of the data for subsequent analysis and comparison.

All interviews and FGDs were audio-recorded, transcribed verbatim and analyzed using NVivo through a hybrid deductive–inductive thematic approach. Prior to analysis, transcripts were read iteratively to identify patterns and points of convergence and divergence. Core thematic areas—including forms and formats of stakeholder engagement, accountability mechanisms i.e. answerability, responsiveness and enforceability, and community perceptions of mining governance—were explicitly embedded in the semi-structured interview and focus group guides, informed by the accountability literature and the study's analytical framework. By embedding MSE directly into interview and FGD design, and data collection, the analysis does not impose MSE ex post onto the findings but rather examines how accountability outcomes emerge from engagement practices as articulated by different stakeholders. Participants were directly asked about consultation processes, grievance mechanisms and experiences of inclusion or exclusion.

Additional themes emerged inductively during coding, particularly around perceived gaps between formal accountability mechanisms and their everyday operation. The analysis was structured around three accountability dimensions: answerability (information provision and justification of corporate actions), responsiveness (adjustment to local demands) and enforceability (availability and effectiveness of redress and sanction mechanisms).

Efforts to interview officials from Cardinal Namdini Mine and Golden

Star Resources Wassa were unsuccessful, with non-participation attributed to internal confidentiality constraints. While this limited direct corporate perspectives, it also reflects broader challenges of access and transparency documented in the literature on extractive governance (see [Dashwood et al., 2022](#); [Sovacool et al., 2016](#)). To address this gap, the analysis draws on grey literature and peer-reviewed sources to contextualize corporate governance practices at these sites.

4. Results and discussion

This section presents the key findings of the study, drawing on field data, and supported by grey and academic literature to examine how meaningful stakeholder engagement (MSE) shapes accountability outcomes in Ghana's mineral industry. Rather than replacing existing accountability frameworks, the analysis extends them by foregrounding accountability as a process produced through engagement practices. While conventional approaches—rooted in political science, law and institutional governance—privilege compliance, oversight and enforcement, this study advances a process-oriented understanding of accountability anchored in MSE. Its central contribution lies in conceptualizing answerability, responsiveness and enforceability as relational outcomes of engagement design and practice, rather than as attributes of institutions alone. Accordingly, MSE is treated not as a background condition but as the primary analytical lens through which accountability is assessed.

Across all cases, mining companies routinely portray their engagement frameworks as participatory and inclusive. The findings, however, reveal a persistent gap between these claims and engagement as experienced on the ground. In practice, engagement processes are frequently procedural rather than substantive, serving corporate risk management and legitimacy objectives more than community empowerment. Consistent with [Jenkins \(2014\)](#), affected persons—particularly women and other marginalized groups—report limited opportunities to influence decisions that directly affect their livelihoods.

This dynamic is evident in Ahafo North, where Newmont Ahafo Mines operates; consultations on compensation and land ownership exposed deeply gendered exclusions (see also [Gyan, 2025](#)). One woman explained, although she cultivates the land and relies on it for household sustenance, legal ownership is vested in her husband, leaving her with little influence over negotiations with the mining company. She emphasized that losing access to the land would mean being 'left at home with nothing' (Interview, February 2023).

This arrangement has repeatedly compelled her husband to assume primary control over engagement with the company, effectively marginalizing her from decision-making processes. These experiences illustrate how stakeholder engagement forums that are formally inclusive can nonetheless undermine answerability, by systematically excluding those most affected from meaningful access to information, justification and voice ([Mercer-Mapstone et al., 2019](#)).

The findings further reinforce [Faanu's \(2026\)](#) argument regarding the persistent disjuncture between policy rhetoric and engagement practice, a gap that continues to constrain accountability and transparency in Ghana's mineral governance. Although the mineral governance framework emphasizes consultation and inclusion, company-level engagement is frequently marked by tokenism, elite capture and top-down modes of communication. As one participant noted, while mining laws require some form of stakeholder engagement, many affected communities remain unaware of their rights to demand inclusive and accountable governance (interview with a Centre for Social Impact Studies [CeSIS] research officer, July 2024).

In practice, companies often prioritize engagement with traditional authorities - a strategy a participant from the Africa Center for Energy Policy (ACEP) described as "very susceptible to corruption, especially given how easily these opinion leaders are convinced" (Interview, August 2024). Such engagement patterns systematically weaken responsiveness, as concerns articulated by community members rarely

translate into substantive changes in corporate behavior or operational practices. Local elites, traditional authorities and male community leaders often dominate engagement platforms, sidelining the voices of women, youth and other vulnerable groups. According to a participant from WACAM,¹ mining companies employ a divide-and-rule tactic engaging the traditional leaders or the traditional authorities and then a few community leaders, creating a wedge between community leaders and the members. In which case, community members are unable to demand accountability (interview, August 2024).

These patterns reflect not only entrenched socio-cultural hierarchies but also institutional weaknesses in the monitoring and enforcement of participatory standards. Consequently, engagement processes rarely function as mechanisms of accountability; instead, they often serve to legitimize decisions that have already been taken ([Andrews, 2021](#)). The absence of credible follow-up, sanctions or accessible redress mechanisms further undermines enforceability, limiting the capacity of engagement to correct harm or compel institutional change.

In aggregate terms, these findings demonstrate that stakeholder engagement in Ghana's mining sector frequently falls short of meaningful stakeholder engagement capable of generating substantive accountability outcomes. Rather than enabling answerability, responsiveness and enforceability, prevailing practices often reproduce exclusionary governance arrangements that stand in stark contrast to the participatory commitments articulated in UN Guiding Principles on Business and Human Rights and the EU Corporate Sustainability Due Diligence Directives. This empirical pattern speaks directly to the participatory governance dimension of the paper's expanded accountability framework, underscoring how deficiencies in MSE translate into broader accountability deficits within extractive governance.

4.1. Current practices in stakeholder engagement in the mineral industry

Stakeholder engagement has become a key arena in which accountability is shaped and negotiated within Ghana's mineral sector. While mining companies generally acknowledge the importance of engaging host communities, our findings show that the quality, inclusivity and responsiveness of these engagements vary significantly. These variations directly affect the capacity of local actors to voice concerns, influence decision-making and hold companies to account. As one civil society respondent observed, engagement and decision-making at the community level should follow the Free, Prior, and Informed Consent (FPIC) principle... a universal standard guiding responsible interaction before any resource extraction intervention (CeSIS Interview, August 2024).

However, Ghanaian mining legislation does not provide for FPIC, a gap that has significant implications for how participation is structured in practice. As a result, "chiefs mostly act as a gateway to the community for mining stakeholder engagement and governance" (CeSIS Interview, August 2024).

Consistent with [Spiegel \(2012\)](#), we find that this institutional arrangement centralizes authority within traditional leadership structures, thereby shaping whose voices are recognized as legitimate in decision-making and constraining opportunities for meaningful participation by women, youth and other marginalized groups. As a result, engagement processes frequently weaken answerability, as companies are not required to justify decisions to affected groups directly, and undermine responsiveness, since community concerns raised outside elite channels rarely translate into change in corporate practice.

Our observations further reveal that the depth and quality of engagement vary not only across companies but also across host communities. This variation is closely linked to corporate

¹ WACAM is an acronym for Wassa Association of Communities Affected by Mining. It is a community-based human rights and environmental advocacy non-governmental organization

governance—specifically whether companies adopt more open or closed approaches to engagement—as well as the country of origin of the company, which often influences openness to global norms and best practices in stakeholder engagement. For instance, in Akyempim and Biung, community members reported that Golden Star Resources and Cardinal Namdini Mines (both Chinese-owned) respectively, conducted initial consultations exclusively with chiefs and elders, with little broader participation. A female participant explained, ...CNM met only with the chiefs. By the time they came to explain the project to the rest of us, decisions were already made. Our concerns were ignored, and we felt powerless to influence what they were doing (Biung Female FGD, December 2024).

Similarly, participant from the male focus group discussion in Kobekro observed, ...they [GSR] met the chiefs and agreed to the terms before informing the community. They do not listen to our concerns... this company deals only with the chiefs and is very secretive in its operations (Male FGD, September 2024).

These accounts illustrate how exclusionary engagement practices constrain local stakeholders' capacity to demand explanations and justifications (answerability) and ensure compliance with agreed standards (enforceability) (Schedler et al., 1999). In the absence of inclusive engagement, communities are unable to effectively monitor company actions or secure corrective measures, thereby undermining transparency and social accountability.

In contrast, Newmont Ahafo Mines and Perseus Mining headquartered in the US and Australia respectively—exhibit more structured and inclusive engagement practices that are more conducive to accountability. Leaders of the Newmont Ahafo Mines' Sustainable Development Committee (SDC) and Perseus Mining's Community Consultative Committee (CCC), highlighted existence of formal feedback mechanisms through which community inputs are systematically documented, reviewed and acted upon. The SDC chairman explained: ... some of the resettled areas have water drought after some time of resettlement. But I will say Newmont is attentive to the concerns. We have discussed this at stakeholder meeting and Newmont is putting plan in place through its corporate social responsibility programs to provide boreholes. I will say the company is attentive and willing to help (Interview, July 2024).

These practices exemplify MSE in operation. By structuring engagement as a continuous, inclusive and responsive process, Newmont Ahafo Mines and Perseus Mining enable communities to influence corporate practices (responsiveness), demand explanations for decisions (answerability), and ensure agreed standards are enforced (enforceability). In this way, MSE transforms engagement from a procedural obligation into a dynamic mechanism for operationalizing accountability, particularly in contexts where formal legal mandates remain weak. This finding is consistent with existing literature, which demonstrates that meaningful engagement enhances sustainable decision-making and accountability by recognizing and communicating the interests of diverse stakeholders while reducing conflict (Jeffery, 2009; Reed et al., 2009). Within this context, local stakeholders are able not only to demand explanations for corporate conduct but also to press for corrective measures and adaptive responses, rather than engagement being limited to crisis management or reputational risk mitigation (Schedler et al., 1999).

Beyond procedural design, these companies also demonstrate commitment to gender inclusivity. Both Newmont Ahafo Mines and Perseus Mining aim to ensure approximately 30 % female representation in consultative processes, strengthening oversight and enhancing women's capacity to hold both corporate and traditional authorities accountable for benefits distribution and development outcomes. This finding reaffirms earlier assessments, including the WACAM review of Newmont's operations, which highlights how the company's engagement strategies and flagship projects have contributed to empowering women to advocate for their well-being (Newmont Ghana Gold Limited, 2017). Collectively, these practices illustrate how MSE actively shape

the social license to operate, reframing legitimacy as conditional and contingent upon sustained, responsible engagement rather than as a fixed legal entitlement. By embedding inclusive and process-oriented practices, these companies operationalize MSE as a means of continually managing impacts in ways consistent with the 'do no harm' principle in responsible business due diligence (OECD, 2017).

At the same time, these engagement approaches are mutually reinforcing and contribute to trust-building—an essential element of both MSE and accountable governance. A community relation officer at Perseus Mining underscores this point, noting that the company's engagement practices are "more liberal and inclusive and adhere to national and international legal requirements in business conduct" (Interview, August 2024). Nonetheless, across all four cases, entrenched socio-cultural beliefs and norms, particularly, gendered perceptions held by traditional authorities, continue to constrain inclusive governance, transparency and accountability.

By contrast, Golden Star Resources Wassa and Cardinal Namdini Mines largely adhere to limited, status quo forms of stakeholder engagement, which undermine local stakeholders' capacity to demand accountability and enforce acceptable standards. As discussed earlier, participants consistently described the corporate governance culture of these companies as "secretive" with levels of openness and inclusiveness directly shaping transparency in benefit-sharing, royalty distribution and decisions affecting livelihoods. Consistent with Sharma (2008), interviews across the study sites, despite some variation, indicate that youth and other marginalized groups are frequently excluded from engagement processes. As a result, they are unable to effectively demand accountability, since these engagement practices lack the openness and transparency necessary to scrutinize corporate actions and omissions. In a focus group discussion, several youth alleged collusions between traditional authorities, mining companies and state actors to undermine their rights to hold authorities accountable for the use of mineral revenue (FGD, August 2024). Similarly, an officer for the Natural Resource Governance Institute (NRGI) observed that, environmental, social and governance issues are becoming a topical issue in the industry as consultations are not done properly, which is leading to some accountability and transparency concerns that again trickle down and affect community participation and development (Interview, August 2024).

These findings underscore the importance of enforceability as a core dimension of accountability within stakeholder engagement. Breaches of agreed commitments should not be treated as procedural failures but must trigger concrete sanctions or corrective actions. More broadly, this requires rethinking how accountability relates to the social license to operate. Rather than conceiving legitimacy in extractive governance as a permanent legal entitlement, we argue that it should be understood as a conditional and revocable form of trust—one that must be continuously earned from communities through transparent, inclusive and responsive practices. Notwithstanding the differences linked to company origin and governance culture, our comparative analysis identifies three dominant engagement approaches in Ghana's mining sector, each with distinct implications for accountability and inclusive governance. The diagram in Section 4.2 visualizes these engagement typologies and their respective accountability outcomes.

4.2. Typologies of engagement and implications for accountability in Ghana's mining sector

The pyramid below presents a theoretical typology of stakeholder engagement in Ghana's mining industry and its implications for accountability. At the apex (Level 1) is a closed consultative engagement, characterized by hierarchical, elite-captured decision-making. Engagement at this level is typically confined to state officials and mining companies, with local communities, largely excluded from deliberations. As Faanu and Andrews (2025) argue, consultation at this stage often involves investors/companies and government agencies negotiating project interests prior to prospecting and exploration. This

model departs fundamentally from the principles of MSE, as it reinforces top-down governance and systematically marginalizes those most affected by mining operations. As a result, accountability is severely weakened, with limited scope of answerability, responsiveness or enforceability.

Such closed engagement practices stand in direct contravention to the UNGPs and EU-CSDDD, which emphasize the state's duty to protect rights, businesses' responsibility to respect human rights and the provision of access to effective remedy. From the UNGPs perspective, accountability requires companies to identify, prevent, mitigate and account for human rights impacts across their operations through robust due diligence, transparent decision-making and effective grievance mechanisms (Koula, 2024; UN, 2011). Closed engagement models fail to meet these standards by foreclosing meaningful participations and limiting scrutiny (Fig. 2).

At the intermediate level (Level 2), the pyramid reflects semi-open consultative engagement, where additional actors such as civil society organizations, traditional authorities and land/property owners are incorporated into the dialogue processes. Although this broadens the range of participants, accountability remains partial, as community voices are often filtered through elite intermediaries. As Faanu and Andrews (2025) note, engagement at this level tends to be ritualistic, frequently excluding ordinary community members—particularly leaseholder farmers who are most affected. This configuration weakens the enforcement of inclusive governance provisions and prioritizes revenue generation over social and environmental considerations, often producing adverse outcomes for mineral-producing communities. As a result, semi-open engagement frequently generates “accountability traps” whereby the presence of voluntary initiatives masks ongoing human rights violations and entrenches uneven development (Park et al., 2024).

Finally, at the base of the pyramid (Level 3) is open-forum consultative engagement, the most inclusive and accountability-enhancing model. At this level, diverse community stakeholders—including women, youth, farmers and other vulnerable groups—participate

directly, continuously and substantively in engagement processes. Consistent with the UNGPs and the EU-CSDDD, this model reflects the core tenets of MSE: [early] involvement, accessibility, responsiveness and attention to power asymmetries. By enabling affected populations to shape decisions rather than merely react to them, open-forum engagement strengthens answerability, enhances responsiveness and improves enforceability, grounding governance in lived realities rather than elite authority (Independent Evaluation Group, 2018).

In practice, Ghana's mineral sector remains predominantly situated at Levels 1 and 2, where engagement is largely procedural, and accountability is limited. At these levels, companies often satisfy only minimal consultation requirements within hierarchical and elite-dominated structures. Achieving meaningful stakeholder engagement therefore requires a consistent shift towards Level 3, where participation becomes transformative and both state institutions and mining companies are rendered genuinely answerable to affected communities.

4.2.1. Hierarchical and elite-centered engagement

The most prevalent form of engagement observed in Ghana's mining industry corresponds to what we classify as hierarchical and elite-centered engagement. Companies like Golden Star Resources Wassa and Cardinal Namdini Mine commonly adopt this model, which aligns with the findings of Fraser (2021) and Spiller et al. (2025). This approach primarily involves consultations with traditional authorities—chiefs and elders—while systematically bypassing broader community participation. Although often justified as culturally appropriate, this approach reproduces entrenched socio-political hierarchies, marginalizes women and youth and constrains affected communities' capacity to demand accountability (Adom et al., 2025; Haman 2025).

From the perspective of the 2011 UNGPs on Business and Human Rights, such engagement practices fall short of the requirement for *meaningful consultation* with affected stakeholders as a core component of human rights due diligence (Principles 18–20). By privileging elite interlocutors, companies risk misidentifying adverse impacts and excluding those most exposed to land loss, livelihood disruption and

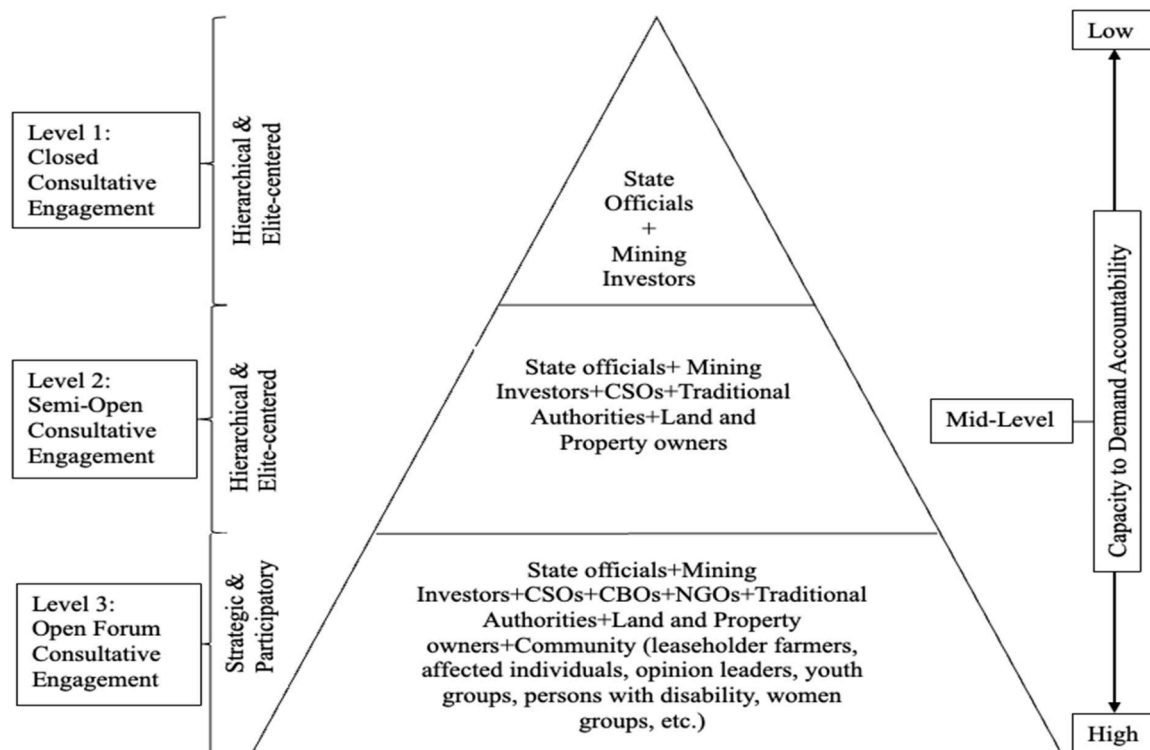


Fig. 2. Stakeholder engagement in Ghana mineral sector and accountability implications.
Source: Authors (2025)

social harm. As a youth leader in Kobekro explained: they (GSR Wassa) have engagements with the chief and two others here. So, that is a major challenge facing the community...it is for their personal gains or selfish interests but not the community's (Interview, September 2024).

These engagements typically occur during planning and permitting stages and are structured to satisfy formal legal or institutional requirements rather than to enable substantive influence or accountability (Owen and Kemp, 2014; Spiller et al., 2025). Interactions are largely confined to government officials, traditional authorities and investors, reinforcing what Kemp (2010) describes as elite-capture in extractive decision-making. Women, youth and leaseholder farmers are structurally excluded from shaping outcomes that directly affect their lives. A youth leader in Kenyasi recounted that "...when we meet them [chiefs and elders] and discuss our issues...they promise to give us feedback. Every day, we keep going back and forth with the same problem" (Interview, July 2024).

Under the EU Corporate Sustainability Due Diligence Directive, this form of engagement is increasingly untenable. The Directive requires inclusive, ongoing engagement with affected stakeholders throughout the due-diligence process, with particular attention to vulnerable and marginalized groups (EU-CSDDD, 2024). Elite-centered engagement that reinforces local power asymmetries undermines this obligation and exposes firms to heightened regulatory and liability risks (OECD, 2016). Even where companies frame these interactions as voluntary CSR initiatives, they tend to prioritize social license and reputational management over genuine power-sharing, rendering engagement largely symbolic rather than meaningful, and legitimizing top-down decision-making (Andriof and Waddock, 2017; Pratt, 2019). We therefore conclude that hierarchical engagement in Ghana's mining sector functions less as a mechanism of accountability than as a strategy for stabilizing elite control.

4.2.2. Strategic and participatory engagement

In contrast, strategic and participatory engagement—though relatively underutilized in Ghana's mining sector—offers a more empowering model of extractive governance. This approach is exemplified by companies such as NAM and PM, which institutionalize stakeholder participation through formal mechanisms including Sustainable Development Committees (SDCs), Community Consultative Committees (CCCs) and Women's Consultative Committees (WCCs). These structures facilitate regular dialogue, gender inclusion and feedback loops, enhancing transparency and responsiveness.

Such arrangements more closely align with the UNGPs of Business and Human Rights' emphasis on continuous stakeholder engagement as part of effective due diligence and with the EU-CSDDD's requirement that companies demonstrate how stakeholder input informs risk identification and mitigation. Our interviews with civil society organizations reveal growing insistence on meaningful consultation, particularly during environmental and social impact assessments. In some cases, consistent with Fraser (2021) and Kemp (2010), we discover that collaboration between communities and advocacy groups has translated into tangible gains in community agency. For example, the Federation of People with Disabilities reported successful engagement with mining companies to advance more inclusive consultation practices. As the president of the Africa Disabilities Institute noted: discussions of issues concerning mining and related issues in Ghana are not inclusive, even though recently we are working with some CSOs and mining companies to accommodate persons with disabilities in their engagement processes (Interview, September 2024).

While these initiatives demonstrate the potential of participatory engagement to deepen accountability, they remain sporadic and fragile. As several CSO actors observed, such models are treated as optional best practices rather than essential governance obligations. This limits their capacity to redistribute power or institutionalize bottom-up accountability. Nevertheless, when genuinely implemented, participatory engagement can function as a vehicle for continuous, rights-based

accountability by enabling marginalized groups to co-create and exercise ownership over engagement processes (Sharma, 2008).

4.2.3. Minimal or reactive engagement

The third and most problematic mode of engagement observed is minimal or reactive engagement, characterized by ad hoc, defensive responses triggered by conflict, reputational threats or regulatory pressure. All four cases examined exhibit elements of this model, albeit to varying degrees. Corroborating Fraser (2019) and Spiller et al. (2025), engagement is frequently initiated only after protests, grievances or external advocacy interventions, rather than being embedded proactively in project design and implementation.

A representative from WACAM explained: sometimes when we, as an advocacy group, demand engagement with Newmont, Ashanti Goldfields Perseus mining because of some concerns from the communities, they are willing to oblige and meet. However, based on my experience and awareness, Golden Star Wassa in Akyempim does not (Interview, August 2024).

This reactive posture reduces accountability to a retrospective and performative exercise. Under both the UNGPs of Business and Human Rights and the EU-CSDDD, such after-the-fact engagement fails to meet due-diligence expectations, which emphasize prevention, early risk identification and meaningful participation. The ritualistic nature of reactive engagement is starkly illustrated in Cardinal Namdini Mines' relocation of residents from the old Biung community, which proceeded without inclusive consultation. A female participant recounted that "only I attended these meetings together with the chiefs. It is not everyone that came.... They always say our [women] voices are not needed" (Interview, October 2024).

These accounts reveal how gendered and structural exclusion intensifies under reactive engagement, where accountability is reframed as crisis management rather than democratic participation. When engagement is confined to post-impact CSR initiatives or grievance mechanisms, community members—particularly women and youth—are denied the opportunity to shape outcomes proactively (Spiller et al., 2025). In practice, this reduces accountability to narrow corporate responses that prioritize damage control over community well-being, reinforcing grievances and mistrust (Faanu et al., 2025). Until stakeholder engagement in Ghana's mining sector becomes proactive, inclusive and justice-oriented, accountability will remain fragile and unevenly distributed.

4.3. Barriers to stakeholder engagement as an accountability tool

Accountability in the extractive sector cannot be reduced to compliance with routine procedures or formal rights. Rather, it is produced through sustained, relational and meaningful engagement that enables communities to influence decision-making and project implementation (Brett, 2003). Our findings reveal significant barriers in how stakeholder engagement is enacted in practice. In particular, mining companies frequently deploy their legal and financial leverage to dominate highly technical processes—such as land and property valuation—in ways that curtail meaningful community influence (Gyan, 2025).

This pattern reflects a broader disjuncture between conventional, compliance-oriented models of accountability and process-based, relational approach embedded in MSE. Whereas compliance-based accountability prioritizes procedural adherence, MSE emphasized trust-building, responsiveness and iterative inclusion across all stages of project development (Buhmann et al., 2024; Jeffery, 2009; Kujala et al., 2022). When technical processes are centralized within corporate or statutory actors, opportunities for dialogue, contestation and shared decision-making are significantly diminished.

During one of our FGDs, community members recounted how NAM unilaterally announced its decision to appoint an external evaluator—drawn from a statutory institution that participants identified as the

Environmental Protection Agency—to conduct property and land assessments for compensation purposes. Although the company framed this decision as routine and legally compliant, several residents questioned the fairness of having an “outsider” lead the valuation exercise. One of the male interlocutors explained: we told them, you cannot just bring your own person to decide what our land is worth, even if you have documents showing the ranges for crops depending on their stage of growth. We have people right here in the community who can do that job even better. They know which land belongs to who, and they know the real value of our crops. So why does the company insist on bringing its own evaluator? This is something some of us never supported (Male FGD, Yamfo, March 2023).

In response, several residents proposed instead that the community nominate a local land evaluator—someone familiar with the area’s land history, social boundaries and farming practices. Although this proposal diverged from the valuation processes outlined in the IFC’s *Good Practice Handbook: Land Acquisition and Involuntary Resettlement* (2023), it illustrates how meaningful engagement often requires epistemic and adaptive practices that extend beyond formal compliance. For community members, the concern was not simply technical accuracy, but trust and accountability. A locally selected evaluator would be seen as having an obligation to protect the community interests rather than serving corporate imperatives.

This moment represented a missed opportunity for the company to demonstrate meaningful accountability. By privileging technical compliance over relational engagement, the company undermined core mechanisms central to MSE, namely, answerability, responsiveness and trust-building. The failure to recognize and integrate local expertise in land valuation significantly weakened the accountability function of stakeholder engagement.

Within an MSE framework, accountability is enacted through ongoing relational practices rather than the mere existence of formal rights or procedures. In principle, allowing communities to nominate their own technical experts should serve as a safeguard against the dominance of more powerful actors (Owen and Kemp, 2014). In practice, however, when communities are unaware of such entitlements or lack the capacity to exercise them, companies retain control over decisions that directly affect livelihoods. This dynamic exposes the limitations of conventional transparency and governance frameworks. While governance and transparency frameworks like the Extractive Industries Transparency Initiative (EITI) emphasizes disclosure and procedural compliance, it does not necessarily ensure that communities can meaningfully influence decisions or protect their interests.

By contrast, MSE foregrounds trust-building, iterative inclusion and adaptive engagement as essential mechanisms for achieving substantive accountability (Freeman and Menghwar, 2024). Through two-way communication, recognition of local knowledge and deliberation embedded across the project lifecycle, MSE helps prevent decision-making from being dominated solely by corporate priorities and instead anchors governance in the perspectives and interests of affected stakeholders (Buhmann et al., 2024). In this way, MSE transforms stakeholder engagement from a procedural formality into a substantive accountability mechanism.

More broadly, this situation reflects what accountability scholarship identifies as a persistent disconnect between formal rights and effective voice (Besada et al., 2015; Newell et al., 2024). Rights may exist on paper, but where less powerful actors lack information, resources or confidence to assert them, those rights remain dormant (Jeffery, 2009). As Ayee et al. (2011) demonstrates, Ghana’s extractive sector is marked by weak institutional capacity, which companies can exploit by framing decisions as routine or legally mandated, thereby reinforcing dependency and passivity among affected communities. A relational, process-oriented MSE approach directly confronts these gaps by deliberately structuring engagements to enable stakeholders to exercise influence across all stages of the project.

Fragmentation within mining-affected communities emerged as

another significant barrier to meaningful engagement. Rather than a unified collective voice, multiple groups with divergent interests and agendas occupied the engagement space. This disintegration weakened collective bargaining capacity and created opportunities for companies to engage selectively, privileging actors whose positions aligned with corporate priorities (Andrews, 2021). Such selective engagement further undermines accountability by amplifying certain voices while marginalizing others.

From a process-oriented MSE perspective, fragmentation should not be treated as a justification for limited consultation, but as a governance challenge that engagement mechanisms must actively address. MSE requires the deliberate design of inclusive and iterative engagement processes that integrate diverse and sometimes competing perspectives into decision-making, thereby limiting the ability of more powerful actors to exploit internal divisions for strategic advantage (Andriof and Waddock, 2017; Jeffery, 2009).

The case of NAM in Ahafo North illustrates these dynamics. Initial consultations in 2017 were directed primarily at traditional authorities, whose endorsement facilitated corporate entry into the area. Farmers whose livelihoods depended on ancestral lands opposed the project and subsequently formed the Concerned Farmers Association to resist dispossession. Despite their opposition, the mining concession was ultimately granted, reflecting hierarchical decision-making and elite capture. In this context, alignment between corporate actors and traditional leadership marginalized dissenting voices and constrained inclusive participation, reinforcing existing power asymmetries (Spiller et al., 2025). One concerned farmer explained: as we have already informed you, we have given our mandate to Centre for Public Interest Law (CEPIL) and WACAM and they advise us a lot. We know what mining will do to our farmlands. So, when we, or CEPIL and WACAM, meet them, we have informed them to speak for us (Interview, March 2023).

The mining company was then compelled to hold engagement sessions with the Concerned Farmers Association, which had delegated negotiation authority to CEPIL and WACAM. This arrangement produced parallel lines of communication; one channel involving traditional leadership and sections of the broader community, and another involving the Concerned Farmers Association, each articulating markedly different positions on mining in the area. This fragmented engagement landscape reflects Spiller et al.’s (2025) observation that stakeholder engagement in mining contexts is often shaped by complex social relationships, as well as Mutti et al.’s (2012) argument that extractive projects generate competing and uneven interests. From an MSE standpoint, accountability emerges not simply from occurrence of engagement, but from the extent to which these interactions are structured to sustain dialogue, incorporate feedback iteratively and enable all groups to meaningfully influence decisions.

These dynamics were further complicated by internal community divisions over the anticipated benefits of mining. Some community members who supported the mining company’s arrival actively encouraged others to accept the project, framing it as a pathway to employment and local development. In an interview, a chief noted that “there are no formal jobs here that guarantee a monthly salary. This company can bring development, so why should we not accept their operations” (Interview, March 2023). Such perspectives stood in sharp contrast to those of the Concerned Farmers, who emphasized the long-term risks of land dispossession, environmental degradation and the exclusion of older farmers from employment opportunities should their lands be relinquished for mining operations. These contestations echo broader scholarship on extractive industries, which documents how rural livelihoods and intergenerational access to land are frequently undermined by mining expansion (Bebbington et al., 2008).

Rather than mediating these competing claims through inclusive and deliberative engagement, the company’s selective engagement practices exacerbated internal divisions and weakened community cohesion. By privileging actors more receptive to mining, corporate strategies reinforced existing social hierarchies and advanced elite interests—a pattern

widely documented in extractive contexts across Africa and Latin America (Mutti et al., 2012). Across our study areas, these fractures were further intensified by perceptions of personal gain and political patronage. Several participants alleged that chiefs who initially opposed the project later shifted their opposition after being promised contracts and procurement opportunities linked to mining operations, reinforcing critiques of elite capture in resource governance (Buur and Monjane, 2016; Standing and Hilson, 2013). A farmer who opposed this shift remarked: for me, we have let them know our stand, but because our chiefs have already accepted for them to mine in the area, things look too late. That is why some of us have promised we will not allow them to evaluate our land for compensation (Interview, February 2023).

Such competing interests weaken accountability in two major ways. First, they disrupt the answerability function, as company no longer required to respond to a coherent set of collective demands. Second, they erode responsiveness, as feedback fails to translate into corrective action when companies can exploit divisions by offering selective concessions to more compliant groups while sidelining dissenting voices. Viewed through an MSE lens, accountability therefore depends on embedding inclusive participation across the entire project cycle, rather than relying on sporadic consultations, static rights or elite intermediaries. Without a unified and inclusive engagement platform, procedural justice is compromised, and the “social license to operate” becomes negotiated through elite bargains rather than broad-based consent.

This dynamic also underscores the limitations of transparency-focused framework such as EITI. While in practice EITI promotes disclosure and procedural alignment, it does not necessarily address the relational and power-laden dynamics that shape participation and accountability on the ground. In fragmented context, stakeholder engagement risks becoming a patchwork of selective interactions that privilege powerful actors while marginalizing the most vulnerable thereby transforming what should be a mechanism to collective oversight into a tool that reproduces inequality and exclusion.

5. Conclusion

This article has shown that although stakeholder engagement is formally embedded within Ghana’s mineral governance architecture, its practice remains uneven and deeply shaped by corporate governance cultures, power asymmetries, and socio-cultural institutions. Across the four cases, engagement frequently departs from the principles of MSE and instead operates as a procedural and symbolic exercise. For women, youth, and other marginalized groups, engagement is experienced less as a mechanism of shared decision-making and more as a means of legitimizing pre-determined outcomes. This gap between policy rhetoric and practice reveals a persistent accountability deficit and deviation from international standards such as FPIC in Ghana’s mining sector.

By advancing a typology of hierarchical and elite-centered, strategic and participatory and minimal or reactive engagement, the article makes a conceptual contribution to debates on accountability and MSE by disaggregating how engagement practices enable or foreclose answerability and responsiveness. Hierarchical and reactive forms of engagement as identified in Golden Star Resources Wassa and Cardinal Namdini Mines constrain answerability by narrowing who is recognized as a legitimate stakeholder and limit responsiveness by insulating decision-making from those most affected. In contrast, the more participatory practices observed in Newmont Ahafo Mines and Perseus Mining demonstrate that when engagement is structured, inclusive and iterative, it can function as a mechanism through which communities pose questions, receive explanations and shape outcomes—core elements of accountability and MSE.

These findings resonate strongly with the expectations articulated in the UN Guiding Principles on Business and Human Rights, which frame stakeholder engagement as central to human rights due diligence and the EU Corporate Sustainability Due Diligence Directive, which

increasingly codifies MSE as a legal obligation rather than a voluntary CSR practice. Under both frameworks, engagement must be continuous, inclusive and attentive to power asymmetries. The Ghanaian cases show that where engagement remains elite-mediated or reactive, accountability is reduced to retrospective damage control rather than proactive risk prevention and rights protection.

Crucially, structural barriers—including limited rights awareness, fragmented community representation, and selective consultation practices—undermine the capacity of stakeholder engagement to deliver meaningful accountability. In doing so, they contribute to rendering the sector effectively ungovernable, as diverse actors pursue competing strategies and practices to protect and advance their interests (Gyan and Behrends, 2024). In such contexts, social legitimacy is constructed through elite accommodation, bypassing meaningful consent from affected community approval, hollowing out both answerability and responsiveness. MSE therefore cannot be treated as an add-on to governance processes; it is the institutional mechanism through which accountability is enacted in practice.

Transforming stakeholder engagement into a genuine accountability mechanism requires aligning national mineral governance with emerging transnational standards. This entails enforcing FPIC within domestic law, establishing independent oversight of engagement processes, strengthening community capacity and unified representation, and mandating transparency around decisions, benefits and remedies. More fundamentally, it requires reimagining stakeholder engagement not as a managerial tool but as a rights-based, power-sensitive process central to democratic resource governance.

Ultimately, meaningful stakeholder engagement must be understood not only as a technical exercise in CSR but as a fundamental question of justice, power, accountability and democratic participation in resource governance. If reforms succeed in bridging the gap between rhetoric and practice, Ghana’s mineral industry could move towards a governance model that balances economic growth with social equity and transformation, and environmental sustainability. Without such reforms, however, stakeholder engagement risks remaining hollow and serving corporate legitimacy rather than enhancing community empowerment and agency to demand accountable mineral extraction and governance.

CRedit authorship contribution statement

Phil Faanu: Writing – original draft, Methodology, Formal analysis. **Augustine Gyan:** Writing – review & editing, Writing – original draft, Methodology, Formal analysis, Conceptualization. **Nathan Andrews:** Writing – review & editing, Conceptualization.

Declaration of competing interest

There is no conflict of interest

References

- Aakhus, M., Bzdak, M., 2015. Stakeholder engagement as communication design practice. *J. Public Aff.* 15 (2), 188–200.
- Aboagye, E.M., 2024. Assessing inclusiveness for indigenous communities in mineral rights allocation in Ghana. *Heliyon*. (8), 10.
- Adams, A.M.N., Chamberlain, D., Thorup, C.B., Grønkjær, M., Conroy, T., 2023. Ethical and feasible stakeholder engagement in guideline development. *Collegian*. 30 (1), 101–109.
- Adom, R.K., Afuye, G.A., Kalumba, A.M., Simatele, M.D., 2025. Integrating the perspectives of youth, women, and marginalised communities in addressing global environmental management challenges. *Env. Manage* 75 (12), 3261–3282.
- Andrews, N., 2021. Manifestations of corporate social responsibility as sensemaking and sense giving in a hydrocarbon industry. *Bus. Soc. Rev.* 126 (2), 211–234.
- Andriof, J., Waddock, S., 2017. Unfolding stakeholder engagement. In: Andriof, J., Waddock, S., Husted, B., Rahman, S.S. (Eds.), *Unfolding Stakeholder Thinking*. Routledge, pp. 19–42.
- Arnstein, S.R., 2019. A ladder of citizen participation. *J. Am. Plan. Assoc.* 85 (1), 24–34.
- Atkinson, C.L., Alibasić, H., 2023. Prospects for governance and climate change resilience in peatland management in Indonesia. *Sustainability*. 15 (3), 1839.

- Ayee, J., Søreide, T., Shukla, G., Le, T.M., 2011. Political Economy of the Mining Sector in Ghana. The World Bank.
- Banerjee, S.B., 2018. Transnational power and translocal governance: the politics of corporate responsibility. *Hum. Relat.* 71 (6), 796–821.
- Bebbington, A., Abdulai, A.-G., Humphreys Bebbington, D., Hinfelaar, M., Sanborn, C., 2018. Governing Extractive industries: Politics, histories, Ideas. Oxford University Press.
- Bebbington, A., Hinojosa, L., Bebbington, D.H., Burneo, M.L., Warnaars, X., 2008. Contention and ambiguity: mining and the possibilities of development. *Dev. Change* 39 (6), 887–914.
- Bendell, J., 2005. In whose name? The accountability of corporate social responsibility. *Dev. Pr.* 15 (3–4), 362–374.
- Besada, H., Lisk, F., Martin, P., 2015. Regulating extraction in Africa: towards a framework for accountability in the global south. *Gov. Afr.* 2 (1), 1–12.
- Bovens, M., 2007. New forms of accountability and EU-governance. *Comp. Eur. Polit.* 5, 104–120.
- Braun, C., Busuioc, M., 2020. Stakeholder engagement as a conduit for regulatory legitimacy? *J. Eur. Public Policy* 27 (11), 1599–1611.
- Brett, E.A., 2003. Participation and accountability in development management. *J. Dev. Stud.* 40 (2), 1–29.
- Buhmann, K., Fonseca, A., Andrews, N., Amatulli, G., 2024. Meaningful stakeholder engagement: the concept, practice and governance. In: Buhmann, K., Fonseca, A., Andrews, N., Amatulli, G. (Eds.), *The Routledge Handbook on Meaningful Stakeholder Engagement*. Routledge, pp. 3–39.
- Butler, P., 2015. Colonial Extractions: Race and Canadian Mining in Contemporary Africa. University of Toronto Press.
- Buur, L., Monjane, C.M., 2016. Elite capture and the development of natural resource linkages in Mozambique. In: Pichler, M., Staritz, C., Küblböck, K., Plank, C., Raza, W., Peyré, F.R. (Eds.), *Fairness and Justice in Natural Resource Politics*. Routledge, pp. 212–229.
- Camilleri, M.A., 2015. Valuing stakeholder engagement and sustainability reporting. *Corp. Reput. Rev.* 18 (3), 210–222.
- Danso, F., 2017. Transparency and accountability in Ghana's mining sector: is it real or fiction? *Int. J. Dev. Sustain.* 6 (11), 1587–1609.
- Dashwood, H.S., 2012. The Rise of Global Corporate Social responsibility: Mining and the Spread of Global Norms. Cambridge University Press.
- Dashwood, H.S., Idemudia, U., Pupilamp, B.B., Webb, K., 2022. The Extractive Industries Transparency Initiative (EITI) and local institutions in Ghana's mining communities: challenges in understanding barriers to accountability. *Dev. Policy Rev.* 40 (5), e12606.
- Demuijnck, G., Fasterling, B., 2016. The social license to operate. *J. Bus. Ethics* 136 (4), 675–685.
- Deverka, P.A., Lavalley, D.C., Desai, P.J., Esmail, L.C., Ramsey, S.D., Veenstra, D.L., Tunis, S.R., 2012. Stakeholder participation in comparative effectiveness research: defining a framework for effective engagement. *J. Comp. Eff. Res.* 1 (2), 181–194.
- Eke, S., Grant, J.A., Mayanja, E.N., Ogunnubi, O., 2024. An agential constructivist analysis of meaningful stakeholder engagement in Africa's critical minerals sector: insights from the Democratic Republic of Congo. In: Buhmann, K., Fonseca, A., Andrews, N., Amatulli, G. (Eds.), *The Routledge Handbook on Meaningful Stakeholder Engagement*. Routledge, pp. 225–243.
- ESCAP, 2018. Training Reference Material: Effective stakeholder Engagement for the 2030 Agenda. United Nations ESCAP.
- EU-CSDDD, 2024. Directive (EU) 2024/1760 of the European Parliament and of the Council of 13 June 2024 on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L:202401760>.
- Faanu, P., 2026. Extractive disjuncture: livelihood disruptions and resettlement in the Talensi District's mining communities in Ghana. *Afr. Geogr. Rev.* 1–22. <https://doi.org/10.1080/19376812.2026.2630639>.
- Faanu, P., Andrews, N., 2025. Stakeholder engagement and company-community relations in Ghana: consultation practices, legal pluralism, and discontents. In: Haslam, P.A., Andrews, N., Buhmann, K., Odumoso-Ayasu, I.T., Stoddart, M. (Eds.), *Contested Consultations in the Extractive Industries*. Routledge, pp. 173–187.
- Faanu, P., Andrews, N., Gyan, A., Saaka, S.A., 2025. Security movements in extractive spaces: dispossession, community-level grievance and resource conflicts in Ghana. *Resour. Policy* 107, 105669. <https://doi.org/10.1016/j.resourpol.2025.105669>.
- Fransen, L., 2012. Multi-stakeholder governance and voluntary programme interactions: legitimization politics in the institutional design of corporate social responsibility. *Socioecon. Rev.* 10 (1), 163–192.
- Fraser, N., 2019. In: Sunkara, B. (Ed.), *The Old is Dying and the New Cannot be Born: From Progressive Neoliberalism to Trump and Beyond*. Verso Books.
- Fraser, J., 2021. Mining companies and communities: collaborative approaches to reduce social risk and advance sustainable development. *Resour. Policy* 74, 101144.
- Freeman, R.E., 1984. Strategic Management: A Stockholder Approach. Pitman.
- Freeman, R.E., Menghwar, P.S., 2024. Stakeholder theory and communities: navigating processes of meaningful engagement with marginalized communities. In: Buhmann, K., Fonseca, A., Andrews, N., Amatulli, G. (Eds.), *The Routledge Handbook on Meaningful Stakeholder Engagement*. Routledge, pp. 43–55.
- Gerring, J., Cojocar, L., 2016. Selecting cases for intensive analysis: a diversity of goals and methods. *Sociol. Methods Res.* 45 (3), 392–423.
- Ghebremusse, S., 2020. Re-Visiting the 'Resource Curse': Law and Mining Governance in Southern African Developmental States. Doctoral Dissertation, York University, Canada.
- Goodland, R., 2012. Responsible mining: the key to profitable resource development. *Sustainability*. 4 (9), 2099–2126.
- Gupta, M., Ashtt, R., Monga, A., 2024. Creating Inclusive and Safe Urban Spaces for Women A Case Study of Gender-Sensitive Urban Planning in Delhi, pp. 789–807.
- Gyan, A., 2025. Persistent shadows of legal pluralism: digital land governance and cyclical land administration setbacks in Ghana. *Afr. Spectr.*, 00020397251361944
- Gyan, A., 2019. Small-scale mining and its impact on rural livelihoods and health in Prestea, Ghana. Master's thesis. The University of Bergen.
- Gyan, A., Behrends, A., 2024. Governing the ungovernable? Conceptualising embeddedness in Ghana's gold mining sector. *Extr. Ind. Soc.* 19, 101484.
- Häberlein, L., Hövel, P., 2023. Importance and necessity of stakeholder engagement. In: Gonzalez-Esteban, E., Feenstra, R.A., Camarinha-Matos, L.M. (Eds.), *Ethics and Responsible Research and Innovation in Practice: The ETHNA System Project*. Springer Nature Switzerland, Cham, pp. 38–53.
- Haman, O.B., 2025. Women and intersectional barriers in social exclusion. In: *Women's Studies International Forum*, 112, p. 2.
- Hill, C., Madden, C., Ezpeleta, M., 2016. Gender and the Extractive Industries: Putting Gender on the Corporate Agenda. Oxfam International. https://www.oxfam.org.au/wp-content/uploads/2016/05/2016-PA-004-Mining-and-Gender-report_FA_web.pdf. Accessed on 18/08/2025.
- Independent Evaluation Group, 2018. Engaging Citizens for Better Development Results. World Bank Publications-Books, Washington, DC.
- Jeffery, N., 2009. Stakeholder engagement: a road map to meaningful engagement. *Doughty Cent. Cranfield Sch. Manag.* 2, 19–48.
- Jenkins, K., 2014. Women, mining and development: an emerging research agenda. *Extr. Ind. Soc.* 1 (2), 329–339.
- Jiang, H., Men, R.L., 2017. Creating an engaged workforce: the impact of authentic leadership, transparent organizational communication, and work-life enrichment. *Commun. Res.* 44 (2), 225–243.
- Kahler, M., Lake, D.A., 2003. Globalization and changing patterns of political authority. In: Kahler, M., Lake, D. (Eds.), *Governance in a Global Economy: Political Authority in Transition*. Princeton University Press, pp. 412–438.
- Kasanga, R.K., Kotey, N.A., 2001. Land Management in Ghana: Building on Tradition and Modernity. International Institute for Environment and Development (IIED), London.
- Kemp, D., 2010. Mining and community development: problems and possibilities of local-level practice. *Community Dev. J.* 45 (2), 198–218.
- Koula, A.C., 2024. Corporate responsibility to respect human rights defenders under the UNGPs and steps towards mandatory due diligence. *Liverp. Law Rev.* 45 (2), 335–358.
- Kujala, J., Sachs, S., Leinonen, H., Heikkinen, A., Laude, D., 2022. Stakeholder engagement: past, present, and future. *Bus. Soc.* 61 (5), 1136–1196. <https://doi.org/10.1177/00076503211066595>.
- Lemke, L.K.G., Beier, J., Hanger-Kopp, S., 2024. Exploring procedural justice in stakeholder identification using a systematic mapping approach. *Env. Sci. Policy* 162, 103900.
- Mercer-Mapstone, L., Rifkin, W., Louis, W., Moffat, K., 2019. Power, participation, and exclusion through dialogue in the extractive industries: who gets a seat at the table? *Resour. Policy* 61, 190–199.
- Moldaliev, J., 2021. Localizing transparency and accountability in extractives. *Extr. Ind. Soc.* 8 (4), 100991.
- Murrey, A., Mollett, S., 2023. Extraction is not a metaphor: decolonial and Black geographies against the gendered and embodied violence of extractive logics. *Trans. Inst. Br. Geogr.* 48 (4), 761–780.
- Muslim, M., Mais, R.G., 2023. The interplay between transparency, accountability, and corruption: a contemporary discourse. *Adv.: J. Ekon. Bisnis* 1 (6), 332–343. <https://doi.org/10.60079/ajeb.v1i6.268>.
- Mutti, D., Yakovleva, N., Vazquez-Brust, D., Di Marco, M.H., 2012. Corporate social responsibility in the mining industry: perspectives from stakeholder groups in Argentina. *Resour. Policy* 37 (2), 212–222. <https://doi.org/10.1016/j.resourpol.2011.05.001>.
- Newell, P., Bellour, S., 2002. Mapping Accountability: Origins, Contexts and Implications for Development. IDS Working Paper 168.
- Newell, P., Price, R., Daley, F., 2024. Landscapes of (in) justice: reflecting on voices, spaces and alliances for just transitions. *Energy Res. Soc. Sci.* 116, 103701.
- Newmont Ghana Gold Limited, 2017. Review of the WACAM Report: assessing the social and economic effects of mining on women affected by NGGL. Final, Plot 40/41 Senchi Str. Airt. Resid. Area Accra Ghana. https://s24.q4cdn.com/382246808/f/iles/doc_downloads/operations_projects/africa/documents/Review-of-the-WACAM-Report-Assessing-the-Social-and-Economic-Effects-of-Mining-on-Women-Affecte-d-by-NGGL.pdf.
- Nyumba, T.O., Wilson, K., Derrick, C.J., Mukherjee, N., 2018. The use of focus group discussion methodology: insights from two decades of application in conservation. *Methods Ecol. Evol.* 9 (1), 20–32.
- Ofose, G., Arthur-Holmes, F., 2025. Transforming Ghana's ASM industry: the intersection of 'mining schemes and stakeholder collaboration. *Resour. Policy* 105, 105610.
- OECD, 2016. Corruption in the Extractive Value Chain: Typology of Risks, Mitigation Measures and Incentives. OECD Development Policy Tools, OECD Publishing, Paris. <https://doi.org/10.1787/9789264256569-en>.
- OECD, 2017. Responsible Business Conduct for Institutional investors: Key considerations for Due Diligence Under the OECD Guidelines for Multinational Enterprises. OECD Publishing, Paris. <https://doi.org/10.1787/8b9e240a-en>.
- Osei-Kojo, A., Andrews, N., 2020. A developmental paradox? The "dark forces" against corporate social responsibility in Ghana's extractive industry. *Environ. Dev. Sustain.* 22 (2), 1051–1071.

- Osei-Kufuor, P., Tenkorang, E.Y., Koomson, F., Ntiri, R.O., 2024. Assessing the effectiveness of social accountability interventions in selected district assemblies in Ghana. *Cogent Soc. Sci.* 10 (1), 2371673.
- Owen, J.R., Kemp, D., 2014. Free prior and informed consent', social complexity and the mining industry: establishing a knowledge base. *Resour. Policy* 41, 91–100.
- Owusu, E.S., 2021. Environmental degradation and Human rights violation: a cursory overview of the potential of the existing frameworks to hold multinational corporations accountable. *Gron. J. Int. Law* 9 (1), 143–173.
- Park, S., Kramarz, T., Johnson, C., 2024. Governance gaps and accountability traps in renewables extractivism. *Environ. Policy Gov.* 34 (6), 754–767.
- Patil, S.V., Vieider, F., Tetlock, P.E., 2014. Process versus outcome accountability. *The Oxford Handbook of Public Accountability*, pp. 69–89.
- Payne, S.L., Calton, J.M., 2004. Exploring research potentials and applications for multi-stakeholder learning dialogues. *J. Bus. Ethics* 55 (1), 71–78.
- Phillips, L., 2011. The Promise of Dialogue. In: Weigard, E. (Ed.), *Promise of Dialogue*. John Benjamins Publishing Company.
- Pratt, B., 2019. Inclusion of marginalized groups and communities in global health research priority-setting. *J. Empir. Res. Hum. Res. Ethics* 14 (2), 169–181.
- Prno, J., 2024. Creating meaningful community engagement outcomes: a practitioner's perspective. In: Buhmann, K., Fonseca, A., Andrews, N., Amatulli, G. (Eds.), *The Routledge Handbook on Meaningful Stakeholder Engagement*. Routledge, pp. 273–279.
- Reed, M.S., Graves, A., Dandy, N., Posthumus, H., Hubacek, K., Morris, J., Prell, C., Quinn, C.H., Stringer, L.C., 2009. Who's in and why? A typology of stakeholder analysis methods for natural resource management. *J. Env., Manage* 90 (5), 1933–1949.
- Reed, M.S., Vella, S., Challies, E., De Vente, J., Frewer, L., Hohenwallner-Ries, D., Huber, T., Neumann, R.K., Oughton, E.A., Sidoli del Ceno, J., 2018. A theory of participation: what makes stakeholder and public engagement in environmental management work? *Restor. Ecol.* 26, S7–S17.
- Ruggie, J., 2011. Report of the special representative of the secretary-general on the issue of human rights and transnational corporations and other business enterprises: guiding principles on business and human rights: implementing the United Nations 'protect, respect and remedy' framework. *Neth. Q. Hum. Rights* 29 (2), 224–253.
- Sharma, B., 2008. Voice, accountability and civic engagement: a conceptual overview. *Comm. Oslo Gov. Cent.* 1–33.
- Schedler, A., Diamond, L.J., Plattner, M.F., 1999. *The Self-Restraining State: Power and Accountability in New Democracies*. Lynne Rienner Publishers.
- Sheate, W.R., 2012. Purposes, paradigms and pressure groups: accountability and sustainability in EU environmental assessment, 1985–2010. *Env. Impact Assess Rev* 33 (1), 91–102.
- Sovacool, B.K., Walter, G., Van de Graaf, T., Andrews, N., 2016. Energy governance, transnational rules, and the resource curse: exploring the effectiveness of the Extractive Industries Transparency Initiative (EITI). *World Dev.* 83, 179–192.
- Spiegel, S.J., 2012. Governance institutions, resource rights regimes, and the informal mining sector: regulatory complexities in Indonesia. *World Dev.* 40 (1), 189–205.
- Spiller, B., Htun, T., Shah, K., 2025. Community engagement and participatory inclusion in mining: challenges, barriers, and opportunities. *Resour. Future. Working Paper* 25-08.
- Standing, A., Hilson, G., 2013. Distributing mining wealth to communities in Ghana: addressing problems of elite capture and political corruption. *U4 Issue*.
- Theisohn, T., Selim, R., 2006. *Mutual Accountability Mechanisms: Accountability, Voice, and Responsiveness*. Capacity Development Group/BDP, UNDP. <https://www.undp.org/sites/g/files/zskgke326/files/publications/Mutual-Accountability-cp6.pdf>. Accessed July 2, 2025.
- UN, 2011. *United Nations Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework*. HR/PUB/11/04, UN Office of the High Commissioner for Human Rights, New York and Geneva.